

8/10/79

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
PUBLIC SERVICE ELECTRIC AND GAS	)	Docket No. 50-272
COMPANY, et al.	)	(Proposed Issuance of
	)	Amendment to Facility
(Salem Nuclear Generating	)	Operating License
Station, Unit 1)	)	No. DPR-70)

APPLICANT'S REQUEST FOR AN EXTENSION OF TIME  
 TO RESPOND TO INTERVENORS' "MOTION TO REOPEN COLEMAN'S  
 CONTENTIONS TWO AND SIX FOR RECEIPT OF NEWLY DISCOVERED  
 EVIDENCE" AND "MOTION FOR RECONSIDERATION OF DISMISSAL OF  
 COLEMAN'S CONTENTION NUMBER THIRTEEN"

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Intervenors Alfred C. Coleman, Jr. and Eleanor G. Coleman ("Intervenors") have moved the Atomic Safety and Licensing Board ("Board") herein to reopen consideration of Contentions two and six, and to reconsider the Board's earlier dismissal of Contention thirteen. Public Service Electric and Gas Company ("Applicant") requests an extension of time until August 31, 1979, within which to respond to Intervenors' motion. The additional time is required because Mr. Wetterhahn, counsel for the Applicant, is presently in Cincinnati engaged in licensing proceedings before a different Atomic Safety and Licensing Board and will also be out of town next week. Mr. Wetterhahn is the only attorney in his law firm who has responsibility for the representation of the Applicant in the instant proceeding. Upon his return, it will be necessary for Mr. Wetterhahn to review Intervenors' motion, do legal research and possibly obtain an affidavit in opposition to the motion.

Further, Mr. Fryling, house counsel for the Applicant, has been ill for some time and has not yet returned to work. His assistance will also be required. The brief extension requested will not unduly delay this proceeding.<sup>\*/</sup> Mr. Smith of the NRC Staff and Mr. Onsdorff, representing the Coleman Intervenors, do not object to this request for an extension.

Respectfully submitted,

CONNER, MOORE & CORBER

*Robert M. Rader*

Robert M. Rader  
Counsel for the Applicant

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<sup>\*/</sup> It is noted that this Board, by Order dated August 2, 1979, recently granted a similar extension of time to the NRC Staff to respond to Board Question No. 4.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
PUBLIC SERVICE ELECTRIC AND GAS ) Docket No. 50-272  
COMPANY, et al. ) (Proposed Issuance of  
 ) Amendment to Facility  
(Salem Nuclear Generating ) Operating License  
Station, Unit 1) No. DPR-70)

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance on behalf of the Applicant in the captioned matter. In accordance with §2.713, 10 C.F.R. Part 2, the following information is provided:

Name - Robert M. Rader  
Address - Conner, Moore & Corber  
1747 Pennsylvania Avenue, N.W.  
Suite 1050  
Washington, D. C. 20006  
Telephone Number - Area Code 202/833-3500  
Admission - United States Court of Appeals  
District of Columbia Circuit  
Name of Party - Public Service Electric and Gas  
Company

  
\_\_\_\_\_  
Robert M. Rader

Dated at Washington, District of  
Columbia, this            day of August, 1979.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
)  
PUBLIC SERVICE ELECTRIC AND GAS ) Docket No. 50-272  
COMPANY, et al. ) (Proposed Issuance of  
) Amendment to Facility  
(Salem Nuclear Generating ) Operating License  
Station, Unit 1) No. DPR-70)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Request for an Extension of Time to Respond to Intervenor's 'Motion to Reopen Coleman's Contentions Two and Six for Receipt of Newly Discovered Evidence' and 'Motion for Reconsideration of Dismissal of Coleman's Contention Number Thirteen'" and "Notice of Appearance," both dated August 10, 1979, in the captioned matter, have been served upon the following by deposit in the United States mail, this 10th day of August, 1979:

Gary L. Milhollin, Esq.  
Chairman, Atomic Safety  
and Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin 53711

Chairman, Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Mr. Frederick J. Shon  
Member, Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Barry Smith, Esq.  
Office of the Executive  
Legal Director  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Dr. James C. Lamb, III  
Member, Atomic Safety and  
Licensing Board Panel  
313 Woodhaven Road  
Chapel Hill, N.C. 27514

Richard Hluchan, Esq.  
Deputy Attorney General  
Department of Law and  
Public Safety  
Environmental Protection  
Section

Chairman, Atomic Safety and  
Licensing Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

36 West State Street  
Trenton, N.J. 08625

Richard Fryling, Jr., Esq.  
Assistant General Solicitor  
Public Service Electric  
& Gas Company  
80 Park Place  
Newark, N. J. 07101

Keith Onsdorff, Esq.  
Assistant Deputy Public Advocate  
Department of the Public Advocate  
Division of Public Interest  
Advocacy  
Post Office Box 141  
Trenton, N. J. 08601


Sandra T. Ayres, Esq.  
Department of the Public Advocate  
520 East State Street  
Trenton, N. J. 08625

Mr. Alfred C. Coleman, Jr.  
Mrs. Eleanor G. Coleman  
35 "K" Drive  
Pennsville, New Jersey 08070

Carl Valore, Jr., Esq.  
Valore, McAllister, Aron  
& Westmoreland  
Mainland Professional Plaza  
P. O. Box 175  
Northfield, N. J. 08225

Office of the Secretary  
Docketing and Service Section  
U.S. Nuclear Regulatory  
Commission  
Washington, D. C. 20555

June D. MacArtor, Esq.  
Deputy Attorney General  
Tatnall Building, P. O. Box 1401  
Dover, Delaware 19901

  
Robert M. Rader