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September 11, 1979

Samuel J. Chilk
Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of the Application of)
Public Service Company of Oklahoma,)
Associated Electric Cooperative, Inc.) Docket Nos. STN 50-556
and) STN 50-557
Western Farmers Electric Cooperative)
)
(Black Fox Station, Units 1 and 2))

Dear Mr. Chilk:

On September 5, 1979, the Applicants in the above-captioned proceeding filed a motion with the Commissioners styled as a "Motion For Commission Action." In the Motion, Applicants urge the Commissioners to accept jurisdiction, and to enter an Order which (i) rejects the demand of the President's Commission on the Accident at Three Mile Island to continue the nuclear licensing moratorium, (ii) adopts the NRC Staff's recommendation to resume licensing, and (iii) directs the Licensing Board to grant Applicants' motion to reopen the Black Fox hearing record and commence evidentiary hearings on TMI issues.

The Commission's regulations in 10 C.F.R. § 2.730 provides that answers to motions may be filed by the other parties to the proceeding within ten days except that the NRC Staff has fifteen days. An additional five days is allowed for the delay attendant to mailing. Applicants' Motion requests the Commissioners' to accept interlocutory

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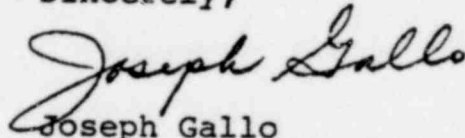
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review of a matter pending with the Licensing Board and to provide direction to that Board. In this circumstance, the Motion is procedurally unique and it is not clear that the Motion is automatically covered by 10 C.F.R. § 2.730. Therefore, Applicants request pursuant to 10 C.F.R. § 2.772(a) that you issue an Order establishing a schedule whereby the answers of the other parties and the NRC Staff would be filed within 15-days (September 20) and 20-days (September 25) respectively.

Although my letter of September 5 to the Commissioners requested that oral argument be held, the request was inadvertently omitted from the Motion itself. Hence, I reiterate our request for oral argument. Applicants believe that oral argument would facilitate decisionmaking by enabling the Commissioners through the questioning process to discern better the pedantic arguments and to reject them in favor of those which best support a course in the public interest.

Sincerely,



Joseph Gallo
One of the Attorneys
for the Applicants

cc: Black Fox Service List

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

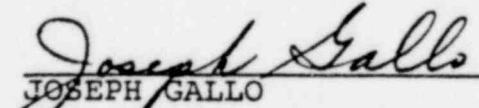
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CERTIFICATE OF SERVICE

I hereby certify that the following:

Letter to Secretary Samuel J. Chilk from
Joseph Gallo, dated September 5, 1979

in the above-captioned proceeding was served upon the
persons shown on the attached list by personal hand delivery
or by depositing copies thereof in the United States mail,
first class postage prepaid, this 11th day of September, 1979.



JOSEPH GALLO
One of the Attorneys
for the Applicants

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