

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
LONG ISLAND LIGHTING COMPANY	)	Docket No. 50-322
	)	
(Shoreham Nuclear Power Station	)	
Unit 1)	)	

County of Suffolk's  
Motion for Time Extension to  
Respond to Staff's Motion  
to Compel

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On May 15, 1978, Staff filed it's "First Set of Interrogatories to the County of Suffolk". The County provided response to these interrogatories by pleading entitled "County of Suffolk's Particularized Contentions". Staff now seeks to compel more responsive answers to various of its interrogatories.

As indicated in a previous submission (see, "Motion for Time Extension to Reply to Applicant's Request for Summary Disposition..."), the County is in the process of engaging a new technical consultant for the Shoreham proceedings, Energy Research Group, Inc.(ERG). Although a contract has been submitted to the County Legislature to provide for ERG's retention, the Legislature has not

yet formally approved the contract. Such approval is expected shortly. In addition to this contingency, ERG has only just recently received the Shoreham FSAR and is now in the process of gathering and reviewing other technical material relevant to the County's contentions. This "catching up" process is a lengthy and time consuming one.

Although the County maintains that its previous response to Staff's interrogatories in general provides a legally sufficient response, it believes input from its technical consultant is necessary in order to properly frame its response to Staff's motion.

For the foregoing reasons, the County requests an extension of time to February 7, 1979 to respond to Staff's motion to compel. Staff counsel was contacted this date and has no objection to this request for a time extension.

Respectfully submitted,

*Irving Like (cc)*  
 Irving Like  
 Special Counsel for the  
 County of Suffolk

Dated: January 31, 1979

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CERTIFICATE OF SERVICE

I hereby certify that on Jan. 31, 1979, a copy of County of Suffolk's Motion for Time Extension to Respond to Staff's Motion to Compel, were sent to the following by postage pre-paid, first-class mail:

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