March 28, 1979

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## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )
HOUSTON LIGHTING & POWER COMPANY )
Docket No. 50-466
(Allens Creek Nuclear Generating )
Station, Unit 1)

## MOTION FOR LEAVE TO FILE RESPONSE TO AMICUS CURIAE BRIEF

On March 12, 1979, the Natural Resources Defense

Council (NRDC) and the Institute for Public Representation

(INSPIRE) filed, among other things, a joint motion for an extension of time to file a brief amicus curiae in this proceeding on behalf of the petition of the Houston Chapter of the National Lawyers Guild. On March 16, 1979, Applicant filed a pleading which, among other things, opposed the motion for an extension of time.

The Appeal Board has not yet acted on the motion.

Nevertheless, on March 19, 1979, NRDC and INSPIRE filed a request for leave to file the brief amicus curiae to which the brief was in fact attached.

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Applicant notes its continuing objection to the motion/request. In the circumstances, however, it deems it appropriate to lodge the attached response to the brief <a href="mailto:amicus">amicus</a> and moves for leave to file it in the event the Appeal Board should grant the pending motion/request.

Respectfully submitted,

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