

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of :
: METROPOLITAN EDISON COMPANY : Docket No. 59-289
: (Restart)
(Three Mile Island Nuclear :
Station, Unit No. 1) :

MOTION FOR EXTENSION OF TIME
TO TAKE DEPOSITIONS



TO: Ivan W. Smith, Esquire
Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Three Mile Island Alert, Inc. (TMIA) by its attorneys,
Widoff Reager Selkowitz & Adler, P.C., hereby moves to extend
the time for taking depositions of Licensee's employees as
follows:

- (a) For depositions noticed on January 28, 1980,
until March 24, 1980.
- (b) For depositions noticed on February 22, 1980,
until March 31, 1980.

In support of this motion, TMIA avers:

- (1) that the additional time is necessary in order
to fully complete the depositions;

(2) that TMIA has pursued the taking of these depositions to the full extent possible despite serious financial problems;

(3) that the remaining depositions are essential to a proper presentation of TMIA's contentions.

I have been authorized to represent that counsel for Licensee does not oppose the extension requested on each of the outstanding depositions of Licensee's employees based upon the fact that TMIA's counsel was unavailable for one week due to personal reasons.

WHEREFORE, TMIA moves for an extension of time until March 24, 1980 and March 31, 1980, respectively.

Respectfully submitted,

WIDOFF REAGER SELKOWITZ & ADLER, P.C.

By: 

Theodore A. Adler

PO Box 1547
Harrisburg, Pa. 17105
(717) 763-1383

Dated: March 11, 1980

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing document, Motion for Extension of Time to Take Depositions, to be placed in the United States mail, first-class, postage prepaid, addressed to the persons listed below:

Ivan W. Smith, Esquire
U.S. Nuclear Regulatory Commission
Atomic Safety & Licensing Board Panel
Washington, D.C. 20555

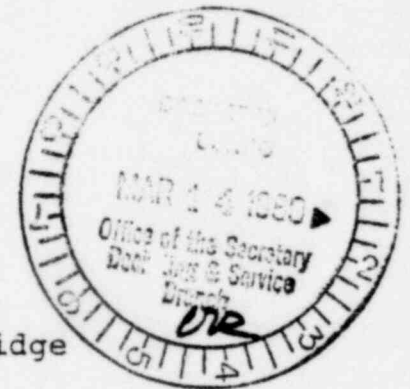
Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, TN 37830

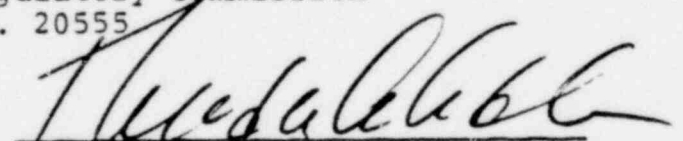
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Docketing and Service Section
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555




Theodore A. Adler

Dated: March 11, 1980