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NRC PUBLIC DOCUMENT

Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

In the Matter of Offshore Power Systems
(Floating Nuclear Power Plants)
STN 50-437



Dear Mr. Chilk:

Pursuant to your authority under 10 C.F.R. §2.772(b), we request an extension of time within which to file a brief as amicus curiae in the captioned matter. As you know, the Commission, by order dated December 8, 1978, accepted review of the question certified to it in ALAB-500 and encouraged amicus participation on the pending question of whether "Class 9 accidents are a proper subject for consideration in the staff's environmental statement on the floating nuclear power plant application."

The record in this case is, of course, extremely voluminous. The briefs of the parties and the decisions of the boards below comprise several hundred pages. We have reviewed the record to determine whether the material already on file adequately states the position our clients may wish to take in order to avoid the filing of redundant arguments as to the impact of extending the review of hypothetical Class 9 accidents to existing and planned land based facilities. This examination and analysis of the record has itself consumed considerable time. We are now in the process of obtaining our clients' views to determine whether an amicus brief should be submitted.

The Commission's Order allowed only 21 days for submission of briefs without regard to mailing time. In view of the complicated nature of the issue presented and the additional time necessary to analyze our position in light of the arguments already on record, the 21 day period provided is simply inadequate.

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Samuel J. Chalk
October 12, 1973
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Accordingly, we request an extension of two weeks within which to file an amicus brief.

Thank you for your attention to this request.

Sincerely,



Troy B. Conner, Jr.

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