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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
U.S. NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

'89 NOV -8 P3:58

In the Matter of)

KERR-MCGEE CHEMICAL CORPORATION)
(West Chicago Rare Earths Facility)

) Docket No. 40-2061-ML
) ASLBP No. 83-495-01-ML
)

ILLINOIS' MOTION FOR AN EXTENSION OF TIME

Now comes the People of the State of Illinois and Illinois Department of Nuclear Safety and asks the Board to grant an additional ten days to file its Response to Kerr-McGee's Motion for an Order to Protect the Board's Jurisdiction. In support of this Motion the People state as follows:

1. Kerr-McGee filed its Motion for an Order to Protect the Board's Jurisdiction on October 27, 1989.
2. 10 C.F.R. 2.730 provides 10 days after service for a party to respond to a written motion.
3. The People were served on October 30, 1989. Pursuant to the Code of Federal Regulations that response would be due on November 9, 1989.
4. The People oppose the Motion which, if granted, would effectively preclude the State of Illinois from filing its application for an amendment of its Agreement with the NRC.
5. It is the position of the People that the Motion on its face does not support the relief requested by Kerr-McGee.

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6. The People request an additional ten (10) days to file a more definitive response to the Motion.

7. Kerr-McCee has stated it will not oppose an extension of time until November 17, 1989.

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State of Illinois

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CERTIFICATE OF SERVICE

'89 NOV -8 P3:59

I, DOUGLAS J. RATHE, an attorney in this case, do certify that on the 7th day of November, 1989, I caused to be served the foregoing Illinois' Motion For An Extension Of Time to be served upon the parties listed below by Express Mail:

- * Peter J. Nickles, Esq.
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and by first class mail, in envelopes bearing sufficient postage to the remaining parties listed on said Notice, by depositing same with the United States Postal Service located at 100 West Randolph Street, Chicago, Illinois, 60601

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