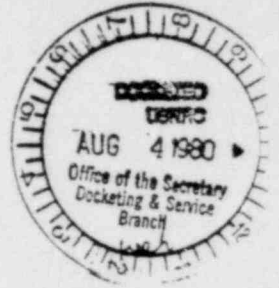


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of \$
APPLICATION OF WESTINGHOUSE \$
ELECTRIC CORPORATION FOR A \$
SPECIAL NUCLEAR MATERIAL \$ DOCKET NO. 70-2909
LICENSE FOR THE ALABAMA \$
NUCLEAR FUEL FABRICATION \$
PLANT (ANFFP) TO BE LOCATED \$
NEAR PRATTVILLE, ALABAMA \$

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE VALID CONTENTIONS

Comes now the intervenor Safe Energy Alliance of Central Alabama, Inc. (hereinafter "SEACA") and by and through its attorney Julian McPhillips moves the Atomic Safety & Licensing Board for a 60 day extension of time in which to file valid contentions in connection with SEACA's petition to intervene. As grounds therefore, SEACA shows unto this Court the following:

1. On July 10, 1980 SEACA served Interrogatories on Westinghouse Electric Corporation (hereinafter "Westinghouse"). In a conference call of July 17, 1980, attorney Bart Crum acknowledged receipt of the Interrogatories and said he would serve Answers on SEACA. As of this July 31, 1980, SEACA has yet to receive any Answers from Westinghouse. SEACA believes the Answers to said Interrogatories would furnish information that would become the basis of additional valid contentions.

2. SEACA presently is receiving the assistance of several scientists, including Dr. Edward Passerini, Dr. Louis Williams, Dr. Carl Morgan, Dr. John Hamilton, Mr. Greg Minor and others. SEACA has yet to receive valuable information, analyses, and reports from these scientists which would be essential in framing valid contentions.

3. SEACA has yet to receive the all-important Environmental Impact Statement and therefore is severely limited in critically analyzing the proposed Alabama Nuclear Fuel Fabrication plant, in that its only source of information as to the specifications of a plant using this process is Westinghouse's own, self-serving

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document, euphemistically called "The Environmental Report."

WHEREFORE, premises considered, SEACA moves the Atomic Safety & Licensing Board for a 60 day extension of time in which to file valid contentions in connection with SEACA's petition to intervene.

Respectfully submitted,

SEACA

By Julian McPhillips
Julian McPhillips
P.O. Box 64
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the following named parties by mailing the same to them on this the 30th day of July, 1980.

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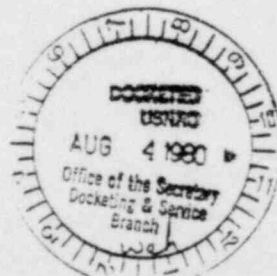
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Atomic Safety and Licensing Board
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Julian McPhillips
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