UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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| In the | e Matte | c of | | |) | | |
| CONSU | MERS PO | VER (| COMPANY | |) | Nos. | 50-329 50-330 |
| (Midla | and Plan | nt, I | Units 1 | and 2) | í | | 30-330 |

MOTION FOR EXTENSION OF TIME WITH RESPECT TO PENDING MOTIONS

Intervenors other than Dow Chemical Company hereby move the Hearing Board for additional time to respond to the following Motions:

- 1. Consumers' Motion served by mail June 7, 1977 with respect to the admission into evidence of documents which Consumers wishes to introduce. A response to this Motion is currently due June 16, 1977;
- 2. Consumers' Motion to admit into evidence certain interrogatories served by mail on June 3, 1977. A response to this Motion is currently due June 16, 1977;
- 3. Consumers' Motion objecting to documents which Intervenors wish to introduce. Consumers' Motion was served by mail on June 8, 1977, and a response is due June 18, 1977;
- 4. The Staff's Motion with respect to evidence, mailed June 2, 1977, a response to which is due on June 15, 1977;
- 5. Consumers' Motion with respect to reconsideration concerning portions of Dr. Timm's testimony. The Motion was served by mail on June A response is due on June 20, 1977.

All of these Motions are interrelated and we should like to file a joint response to be mailed on or before Friday, June 24, 1977. This additional period of a few days is necessary in order for us to communicate with Dr. Timm and to account for the fact that because of personal reasons, I have not been in the office full time during the past days.

WHEREFORE, Intervenors request that their responses or oppositions to the above Motions be timely filed if mailed on or before June 24, 1977.

Respectfully submitted

Dated: June 16, 1977

Attorney for All Intervenors except Dow Chemical Company

MYRON M. CHERRY One IBM Plaza Suite 4501 Chicago, Illinois 60611 (312) 565-1177

PROOF OF SERVICE

I hereby certify that a copy of the foregoing Motion was served upon members of the Licensing Board, the Docketing and Services Section of the Office of the Secretary of the Commission, and counsel for Consumers Power Company, Dow Chemical Company, and the NRC Staff, by postage prepaid, properly addressed mail on this 16th day of June, 1977.

on M. Cherry