

ENVIRONMENTAL COALITION ON NUCLEAR POWER

Co-Directors: Mr. George Boomsma—R.D. #1, Peach Bottom, Pa. 17563 717-548-2836

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
METROPOLITAN EDISON COMPANY, et al.
(Three Mile Island, Unit 1 Restart) } Docket No. 50-289

ECNP INTERVENORS' STATEMENT OF NEED AND REQUEST FOR ADDITIONAL RESPONSE TIME

For a variety of reasons, including unavailability of volunteer staff, unanticipated appointments, travel, other NRC filing deadlines, illness, and the loss of the full day at hearing, the ECNP representative has not been able to complete responses to interrogatories on emergency planning revised contentions as anticipated between October 6 and 16. The lack of some of the necessary documents has greatly exacerbated the problem.

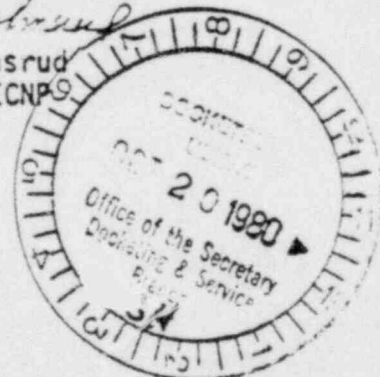
ECNP therefore asks the Board to extend the time period for response, including response to Suspended Licensee's motion for sanctions and Staff's opposition to ECNP's contentions on these issues until October 30, 1980. In view of the Licensee's and Staff's failures to meet filing deadlines -- and in view of the uncertainties of the hearing schedule over the next several weeks and various changes in deadlines which have caused substantial inconvenience to intervenors in scheduling their other work loads and obligations, -- ECNP believes that this is a reasonable request. It is clear from the Staff and Licensee comments at the first day of hearing that this delay would not significantly prejudice those parties, both of which appear to be already severely overloaded. The request resembles that granted to Mrs. AAmoet.

Had the ECNP representative realized how much still remained to be completed, this request would have been tendered to the Board at the hearing on October 15:

Respectfully submitted,

Judith H. Johnsrud
Judith H. Johnsrud
Co-Director, ECNP

Dated this 16th day
of October, 1980



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