UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES GENERATING COMPANY, <u>ET AL</u>. FOR AN OPERATING LICENSE FOR COMANCHE HEAK STEAM ELECTRIC STATION UNITS #1 AND #2 (CPSES) Docket Nos. 50-445 and 50-446

8/20/80 21

OCKETED

2 5 1980

CASE'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO APPLICANTS' FIRST SET OF INTERROGATORIES TO CASE AND REQUESTS TO PRODUCE

Pursuant to 10 CFR 2.711, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby moves for an extension of time of 14 days, until September 3, 1980, in which to file its Answer to Applicants' First Set of Interrogatories to CASE and Requests to Produce which were filed by Applicants on August 1, 1980 and received by CASE on August 7, 1980.

This extension is necessary because these interrogatories are so voluminous that it requires additional time to prepare this Intervenor's responses. However, we are working on our responses and will file such responses as soon as possible.

Since there has been no time designated yet for the hearings themselves to begin, this extension will not prejudice the rights of any party in these proceedings.

8008280215

WHEREFORE, PREMISES CONSIDERED, CASE hereby moves for an extension of time of 14 days, until September 3, 1980, in which to file its Answer to Applicants' First Set of Interrogatories to CASE and Requests to Produce.

4 . 0 .

1

Respectfully submitted,

Manita Ellis

(Mrs.) Juanita Ellis, President CASE (Citizens Association for Sound Energy) 1426 S. Polk Dallas, Texas 75224 214/946-9446

8/20/80



## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES GENERATING COMPANY, ET AL. FOR AN OPERATING LICENSE FOR COMANCHE PEAK STEAM ELECTRIC STATION UNITS #1 AND #2 (CPSES)

Docket Nos. 50-445 and 50-446

## CERTIFICATE OF SERVICE

I hereby certify that copies of "CASE'S MOTION FOR EXTENSION OF TIME IN WHICH TO RESPOND TO APPLICANTS' FIRST SET OF INTERROGATORIES TO CASE AND REQUESTS TO PRODUCE" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first claus, this 20th day of August, 1980:

Valentine B. Deale, Esq., Chairman Atomic Safety and Licensing Board 1001 Connecticut Avenue, N. W. Washington, D. C. 20036

Dr. Forrest J. Remick, Member Atomic Safety and Licensing Board 305 E. Hamilton Avenue State College, PA 16801

Dr. Richard Cole, Member Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Nicholas S. Reynolds, Esq. Debevoise & Liberman 1200 - 17th St., N. W. Washington, D. C. 20036

Marjorie Rothschild Counsel for NRC Staff U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Mr. Geoffrey M. Gay West Texas Legal Services 100 Main Street (Lawyers Bldg.) Fort Worth, TX 76102

Jeffery L. Hart, Esq. 4021 Prescott Avenue Dallas, TX 75219 David J. Preister, Esq. Assistant Attorney General Environmental Protection Division P. O. Box 12548, Capitol Station Austin, Texas 78711

Mr. Richard Fouke 1668-B Carter Drive Arlington, TX 76010

Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Atomic Safety and Licensing Appeal Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Docketing and Service Section Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Arch C. McColl, III, Esq. 701 Commerce Street, Suite 302 Dallas, TX 75202

Juanita Ellis, President CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)