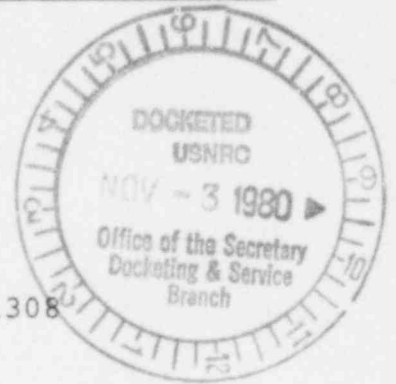


Dated: October 30, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF GENERAL)
ELECTRIC COMPANY,)
)
)
)
)
Consideration of Renewal of)
Materials License No. SNM-1265)
Issued to G.E. Morris Operation)
Fuel Storage Installation.)

Docket No. 70-1308

ANSWER OF GENERAL ELECTRIC
TO MOTION TO STAY PROCEEDINGS OF
THE STATE OF ILLINOIS

General Electric Company ("General Electric") submits this memorandum, pursuant to 10 C.F.R. §2.730(c), as its answer to the Motion to Stay Proceedings of the State of Illinois ("Illinois"), which was filed on October 15, 1980. General Electric opposes Illinois' motion and states as follows:

1. In the first place, Illinois has pointed to no reason to delay this Board's consideration of General Electric's motions for sanctions filed on October 9 and 13 against Intervenors Rorem, et al. and Illinois. Those motions do not address the substance of the license renewal application and are unaffected by promulgation of 10 C.F.R., Part 72, which Illinois puts forth as the major reason to stay this entire proceeding. Those motions are based upon the improper conduct of both intervenors in failing to comport themselves in good faith as parties to the proceeding. Their conduct is already a matter of record. No reason exists for the Board to delay imposition of sanctions on the intervenors for their unjustified disregard of the discovery orders and schedule imposed by the Board.

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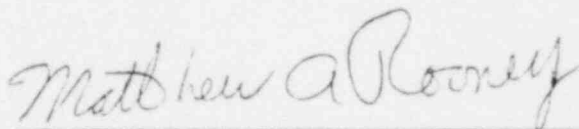
2. Yesterday, General Electric received from the NRC Staff an advance copy of what purports to be the newly promulgated Part 72. This is the first opportunity General Electric has had to study the regulations under which its license renewal application will now be reviewed. In order to proceed in this matter in an orderly and expeditious manner General Electric proposes that it submit to this Board, within 2 weeks from the date of this filing, on November 13, 1980, a revised schedule for proceeding in this matter under Part 72. The schedule, as it is envisioned, will permit General Electric, to make what changes or additions, if any, are required under Part 72 to documents, including the Consolidated Safety Analysis Report submitted as part of General Electric's application for renewal of SNM-1265. The schedule will also permit a period of time for the Intervenors and the NRC Staff to review the additional or changed documents prior to resumption of the proceeding.

For both these reasons Illinois' Motion To Stay Proceedings should be denied and General Electric should be granted permission to suggest a revised schedule to this Board by November 13, 1980.

Respectfully submitted,

GENERAL ELECTRIC CO.

By:



Ronald W. Szwajkowski
Matthew A. Rooney
Its Attorneys

OF COUNSEL:
MAYER, BROWN & PLATT
231 South LaSalle Street
Chicago, Illinois 60604
(312) 782-0600

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
GENERAL ELECTRIC COMPANY)
) Docket No. 70-1308
Consideration of Renewal of)
Materials License No. SNW-1265)
Issued to GE Morris Operation)
Fuel Storage Installation)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of ANSWER OF GENERAL ELECTRIC TO MOTION TO STAY PROCEEDINGS OF THE STATE OF ILLINOIS, in the above-captioned proceeding on the following persons by causing the said copies to be deposited in the United States mail at 231 South LaSalle Street, Chicago, Illinois, in plainly addressed and sealed envelopes with proper first class postage attached before 5:00 P.M. on October 30, 1980:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Dr. Linda W. Little
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, North Carolina 27612

Dr. Forrest J. Remick
Atomic Safety and Licensing Board
305 East Hamilton Avenue
State College, Pennsylvania 16801

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

Bridget L. Rorem
Essex, Illinois 60935

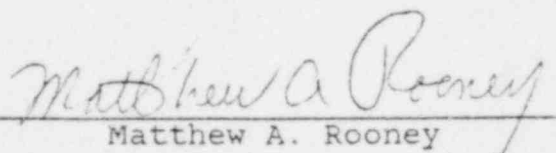
Everett J. Quigley
R.R. 1, Box 378
Kankakee, Illinois 60901

Susan N. Sekuler, Esq.
George William Wolff, Esq.
Office of the Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Marjorie Ulman Rothschild, Esq.
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board 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


Matthew A. Rooney