

May 27, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of:

SOUTH CAROLINA ELECTRIC &  
GAS COMPANY, et al.

(Virgil C. Summer Nuclear  
Station, Unit 1)

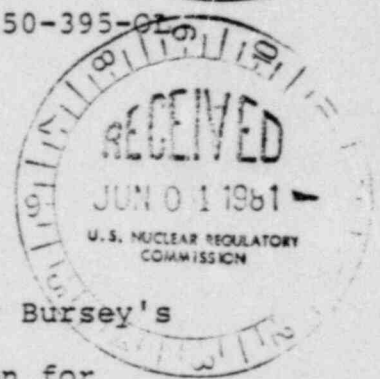
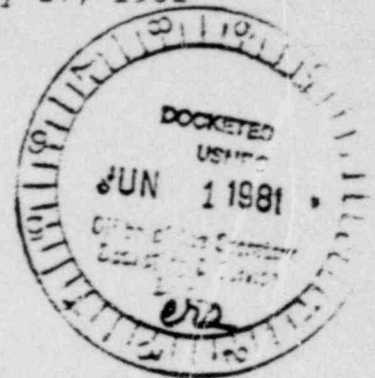
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) Docket No. 50-395-02  
)  
)

APPLICANTS' RESPONSE TO INTERVENOR  
BURSEY'S REQUEST FOR EXTENSION OF TIME

On May 26, 1981 Applicants received Intervenor Bursey's request for an extension of time (styled as a Motion for Continuance) until June 5, 1981 for the filing of his answers to Applicants' and Staff's Motions for Summary Disposition of certain contentions.

Applicants' Response is in the alternative. First, we oppose the Motion on the ground that no good cause for an extension of time has been shown. Mr. Bursey has alluded to prospective difficulties, several weeks into the response period, in securing responsive affidavits. He has not shown that he has been diligently attempting to secure affidavits during the weeks since May 8, 1981. Moreover, he has not shown any cause at all for extension of the Response itself as opposed to the affidavits to accompany the Response. Once again, he apparently expects to be excused from the obligations of a party.

In the alternative, if the request is to be granted, then such relief should be afforded only upon the following conditions:

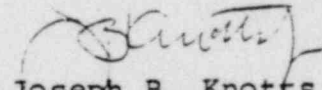


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- (a) No further extension of time for any part of the Response to Applicants' and Staff's Motions for Summary Disposition should be entertained, and a late filing should be stricken.
- (b) Mr. Bursey should be required to arrange hand delivery in Washington, D. C. on Applicant and Staff Counsel not later than 5:00 p.m. on June 5, 1981.
- (c) No further extension of time of any kind for any purpose should be accorded to Mr. Bursey absent the most extraordinary good cause; in particular, any direct testimony or exhibits which can be presented must be filed on schedule on May 28, 1981 or such will be stricken and such testimony or exhibits will not be permitted to be introduced at hearing.

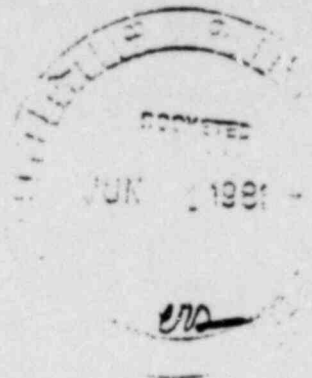
Respectfully submitted,



Joseph B. Knotts, Jr.  
Counsel for Applicants

Date: May 27, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

SOUTH CAROLINA ELECTRIC & GAS COMPANY and	)	Docket No. 50-395 OL
	)	
SOUTH CAROLINA PUBLIC SERVICE	)	
AUTHORITY	)	
	)	
(Virgil C. Summer Nuclear	)	
Station)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response To Intervenor Bursey's Request for Extension of Time" were served upon the following persons by deposit in the United States mail, first class postage prepaid, this 27th day of May, 1981:

Herbert Grossman, Esq.  
Chairman, Atomic Safety and  
Licensing Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D. C. 20555

Chairman, Atomic Safety and  
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Licensing Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
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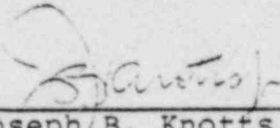
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