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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '81 NOV -9 P12:12

ATOMIC SAFETY AND LICENSING BOARD
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges
Sheldon J. Wolfe, Chairman
Dr. Paul W. Purdom
Frederick J. Shon



In the Matter of)
)
PUBLIC SERVICE COMPANY OF)
OKLAHOMA, ASSOCIATED)
ELECTRIC COOPERATIVE, INC.)
and)
WESTERN FARMERS ELECTRIC)
COOPERATIVE,)
)
(Black Fox Station,)
Units 1 and 2))

Docket Nos. STN 50-556CP
STN 50-557CP

INTERVENORS' MOTION FOR ADDITIONAL TIME
TO IDENTIFY HYDROGEN CONTROL CONTENTIONS

Intervenors respectfully request that the Hearing Schedule (as adopted pursuant to the Board's Order of October 14, 1981) be modified to extend until November 21, 1981, the time within which to identify and propose contentions related to hydrogen control measures. In support of their application, Intervenors would show the Board that Applicant's Amendment No. 18 to the BFS PSAR was not delivered to the parties until October 22, 1981, thereby preventing all parties from having sufficient time to review this Amendment. Indeed, Applicant's attorneys have acknowledged the belated delivery and indicated their acquiescence

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to additional time if needed by the parties. (See Joseph Gallo letter of October 21, 1981, attached.) Intervenors have since confirmed the Applicant's lack of objection to this request and Staff counsel was of the opinion that such additional time was implicit in the scheduling order because of the acknowledged belated delivery of the Hydrogen Control Amendment to the PSAR. Intervenors therefore respectfully request that the hearing schedule be modified accordingly.

FELDMAN, HALL, FRANDEN & WOODARD

By Joseph R. Farris
Joseph R. Farris

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October 21, 1981

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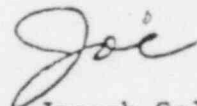
Dear Joe:

I am enclosing two copies of Amendment No. 18 to the Black Fox PSAR. This Amendment is being delivered to the NRC Staff on October 22, and it covers the hydrogen control issues of the Near-Term Construction Permit/Manufacturing License regulations.

As previously discussed with you and Mike Bardrick, I acknowledge the fact that you require 30-days for your review and the development of contentions on Amendment No. 18. This material is being delivered by Federal Express, and they guarantee delivery by the 22nd. I calculate, based on the receipt of the material tomorrow, November 21 to be the due date.

Please call if you have any questions.

Sincerely,



Joseph Gallo

JG/pm
Enclosure

cc: Michael Bardrick, Esquire

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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD ^{SECRETARY}
_{REGULATORY & SERVICE}
BRANCH

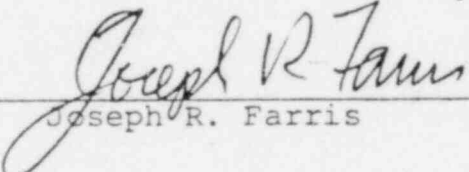
In the Matter of the Application of)
Public Service Company of Oklahoma,)
Associated Electric Cooperative, Inc.)
and)
Western Farmers Electric Cooperative) Docket Nos.
(Black Fox Units 1 and 2)) STN 50-556CP
STN 50-557CP

CERTIFICATE OF SERVICE

I, Joseph R. Farris, one of the attorneys for Citizens Action for Safe Energy (C.A.S.E.), certify that copies of the following:

1. Intervenors' Proposed Contentions for the Continued Radiological and Safety Hearings;
2. Intervenors' Motion for Additional Time to Identify Hydrogen Control Contentions; and
3. Intervenors' Motion to Re-Open the Radiological and Safety Hearings.

have been served on the persons shown on the attached list by United States Mail, postage prepaid, this 5th day of November, 1981.



Joseph R. Farris

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United States Nuclear
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Washington, D.C. 20555

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Washington, D. C. 20555
(20 copies)

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Atomic Safety and Licensing
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