



U.S. NUCLEAR REGULATORY

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
CONSUMERS POWER COMPANY
(Big Rock Point Nuclear Plant)

Docket No. 50-155-OLA)(Spent Fuel Pool)Expansion)

INTER/ENORS MOTION FOR NINE DAYS EXTENSION TO FILE RESPONSE TO MOTIONS REGARDING INTERVENORS ADDITIONAL CONTENTIONS

Intervenors request a nine day extension, until October 9, 1981 to file response to motions concerning additional contentions filed by Intervenors on September 4, 1981. Extensive motions and objections have been filed by the Staff and Licensee attacking the right of Intervenors to file the contentions, which must be answered after considerable legal research as well as a search of the record in this proceeding. In addition, Intervenors are consulting with experts to set out the basis for the contentions and the threat to health and safety of the public involved.

Because Intervenors lacks funds to pay experts, we must rely upon volunteer expert assistance which does not always respond as quickly as the highly paid experts employed by Licensee.

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CERTIFCATE OF SERVICE

I certify that copies of Intervenors Motion for Nine Day Extension was served on those on the attached list by first class mail, postage prepaid, the 30th day of September, 1981.

Herbert Semmel

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