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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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COMM. DIV.
'90 FEB 14 P3:50

Before Administrative Judges
Peter B. Bloch, Chair
Dr. George C. Anderson
Elizabeth B. Johnson

In the Matter of)	Docket Nos. 50-250-OLA-5
)	50-251-OLA-5
FLORIDA POWER & LIGHT)	
COMPANY)	Technical Specifications
Turkey Point Plant)	Replacement
(Unit Nos. 3 and 4))	
)	ASLBP No. 90-602-01-OLA-5
Facility Operating)	
Licenses Nos. DPR-31, DPR-41)	February 8, 1990
)	

MOTION FOR EXTENSION OF TIME

Petitioners, Thomas J. Saporito, Jr. and the Nuclear Energy Accountability Project (NEAP), hereby file this Motion for Extension of Time to file their contentions and amended petition until and including Tuesday, March 20, 1990 and in support thereof would state:

1. Petitioner, Thomas J. Saporito, Jr., a pro se litigant who is representing NEAP's interests in this proceeding, practices a dual professional career both as a teacher with a private educational trade school and as a research analyst for NEAP. These shared responsibilities include writing daily lesson plans and tests for the teaching position and researching and preparing materials for a scheduled February 21, 1990 public hearing before the Florida Public Service Commission, a hearing which Mr. Saporito has obtained standing to participate.

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Mr. Saporito is the Executive Director of NEAP and therefore his responsibilities to NEAP's membership along with his personal responsibilities as a teacher, will adversely affect his ability to meet the February 20, 1990 filing deadline established in the Boards' February 5, 1990 MEMORANDUM AND ORDER which Petitioners' received on February 7, 1990.

2. There are no other means available to Petitioners whereby their interests will be protected from the licensing actions sought by the Licensee because there exists no other litigation on the contested issue.

3. Petitioners' participation in this proceeding, should they be admitted as Intervenors, will assist in developing a sound record.

4. Petitioners' interests will not be represented by the existing parties.

5. Granting this extension of time will not adversely affect the license amendment in question since the Commission, has in the past, granted license amendment requests without consideration of pending Intervention.

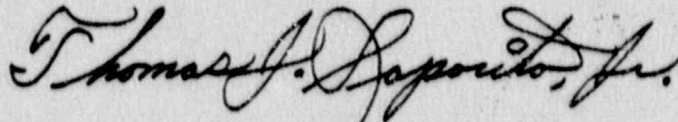
6. Petitioners find the Boards' comments regarding the spirit of respect, in the MEMORANDUM AND ORDER of February 3, 1990, to be refreshing and certainly encouraging. Therefore, Petitioners assert here that granting this Motion will provide Petitioners an opportunity to comply with the Boards' suggestion to meet with the Licensee and informally discuss Petitioners concerns related to these proceedings.

Petitioners concur with the Board that such actions will provide for the parties to develop a relationship that may permit them to avoid unnecessary procedural disputes and to settle all or part of their controversy voluntarily.

Pursuant to 10 C.F.R. 2.711(a), Petitioners submit that "good cause" has been demonstrated for a continuance.

WHEREFORE, Petitioners request an extension of time to file their contentions and amended petition until and including Tuesday, March 20, 1990.

Respectfully submitted,



Thomas J. Saporito, Jr.
Executive Director

Nuclear Energy Accountability
Project
1202 Sioux Street
Jupiter, Florida 33458
(407) 743-0770

cc: Service sheet

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OFFICE OF THE SECRETARY
DOCKETING AND COMPLIANCE
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COMPANY)	Technical Specifications
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Facility Operating)	
Licenses Nos. DPR-31, DPR-41)	February 8, 1990

CERTIFICATE OF SERVICE

I hereby certify that copies of Petitioners' "MOTION FOR EXTENSION OF TIME" in the above captioned proceeding, were served on the following by deposit in the United States mail, first class, properly stamped and addressed, on the date shown below.

Honorable Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dated this 8th day of February,
1990 at Jupiter, Florida.


Thomas J. Saporito, Jr.
Executive Director, NEAP