

October 21, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

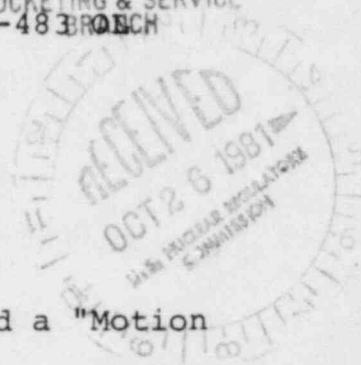
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
)
UNION ELECTRIC COMPANY)
)
(Callaway Plant, Unit 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. STN 50-483 BENCH

APPLICANT'S ANSWER TO JOINT INTERVENORS'
MOTION TO EXTEND TIME



On October 20, 1981 Joint Intervenors filed a "Motion to Extend Time," which requests a change in the current schedule for: (a) the filing of Joint Intervenors' answers to motions for summary disposition; (b) a deferral of the prehearing conference now scheduled for October 26; and (c) the commencement of the hearing on Joint Intervenors' construction defects contentions.

The schedule adjustments requested by the motion track the proposal Joint Intervenors advanced informally in a letter to me of October 13, 1981. I replied to that proposal in a letter dated October 20, 1981 to counsel for Joint Intervenors. My letter, a copy of which was served upon the Board and all parties, fully responds to the instant motion and is hereby incorporated and adopted as a part of this answer.

Applicant assumes that it will not be possible for the Board to defer the prehearing conference now scheduled

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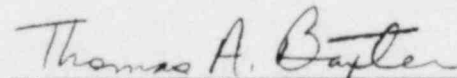
to take place in St. Louis on Monday, October 26. We further assume that the Board would desire to hear further argument on Joint Intervenors' motion at that conference. If the Board should decide, however, to postpone the prehearing conference, Applicant may be notified on Friday, October 23, via the office of Joseph E. Birk, Assistant to the General Counsel, Union Electric Company, at 314-621-3222.

I would repeat here, for clarity, only two of the many points made in my letter of October 20, 1981. First, it should be understood that none of the information sought in Joint Intervenors' motion to compel or in their letter of October 13, 1981 relate to the issues of concrete cracks or concrete cover requirements, which are the subjects of motions for summary disposition. Second, Applicant fully responded to Joint Intervenors' document request of September 28, 1981 by letter of October 14, 1981 which provided a copy of the materials requested. I do not understand why Joint Intervenors' motion represents that this request remains outstanding.

For all of the foregoing reasons, Applicant opposes Joint Intervenors' Motion to Extend Time.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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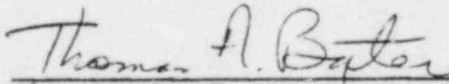
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
UNION ELECTRIC COMPANY) Docket No. STN 50-487 OL
)
(Callaway Plant, Unit 1))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Answer to Joint Intervenors' Motion to Extend Time" were served this 21st day of October, 1981 by express mail upon Kenneth M. Chackes, by hand delivery upon the parties identified by an asterisk and by deposit in the U.S. mail, first class, postage prepaid, to the other parties on the attached Service List.



Thomas A. Baxter

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
UNION ELECTRIC COMPANY) Docket No. STN 50-483 OL
)
(Callaway Plant, Unit 1))

SERVICE LIST

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