

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 APR 20 P107

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of:

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al

(Seabrook Station, Units 1 and 2)

)  
) Docket Nos. 50-443 OL

)  
) 50-444 OL  
)  
)

MOTION FOR LATE ENTRY OF AMENDMENT TO PETITION TO INTERVENE

NOW COMES the Petitioner, SUN VALLEY ASSOCIATION, by and through its attorneys, SANDERS AND McDERMOTT PROFESSIONAL ASSOCIATION OF Hampton, County of Rockingham and State of New Hampshire, and for the reasons stated below, moves for late entry of its Amendment to the Petition to Intervene:

1. The SUN VALLEY ASSOCIATION filed its Petition to Intervene in the above referenced operating license proceedings on November 18, 1981.

2. In reliance upon 10 C.F.R. Section 2.714 (a) (3) the attorney for SUN VALLEY ASSOCIATION had intended to file an amendment to the Petition at least fifteen days prior to the holding of the Special Pre-hearing Conference.

3. Contemporaneous with notification by the Atomic Safety and Licensing Board of the Special Pre-hearing conference plaintiff's attorney suffered a death in her immediate family.

4. The personal misfortune of Petitioner's attorney constitutes the singular reason for Petitioner's failure to file its Amendment in accordance with the Revised Schedule set forth in the "Memorandum and Order setting Special Hearing Conference".

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5. Due to the unique interests of SUN VALLEY ASSOCIATES, as set forth more particularly in its Petition of November 18, 1981, the Petitioner's interest will necessarily go unheard in the event that this Motion is not granted.

6. Petitioner's participation in the above referenced operating license proceedings is a necessary element in the development of a sound record.

W H E R E F O R E: SUN VALLEY ASSOCIATES request that:

A. The Board allow this Petitioner to submit its Amendment by APRIL 21, 1982, and

B. The Board grant such other and further relief as may be deemed just.

Respectfully submitted:

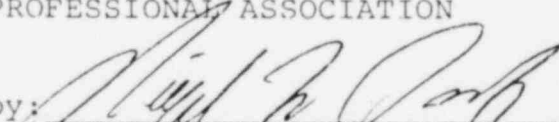
SUN VALLEY ASSOCIATES

by its attorneys

SANDERS AND McDERMOTT  
PROFESSIONAL ASSOCIATION

April 13, 1982

by:

  
Wilfred L. Sanders, Jr.

CERTIFICATE OF SERVICE

I, Wilfred L. Sanders, Jr., Esq., hereby certify that a copy of the foregoing Motion has been mailed this thirteenth day of April, 1982, by first class mail, postage prepaid, to:

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