

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PUGET SOUND POWER & LIGHT CO.) Docket Nos. STN-50-522
et. al.) STN-50-523
)
(Skagit/Hanford Nuclear Projects,)
Units 1 and 2))

MOTION FOR EXTENSION OF TIME

Fursuant to 10 CFR 2.711(a) the Coalition for Safe Power requests an extension of time for the filing of additional contentions in the above-captioned proceeding. The Coalition asserts that good cause exists and even the more stringent requirements of 10 CFR 2.714(a)(1) are met. Thus this motion should receive a favorable ruling.

Good Cause

The Coalition, by letter dated December 2, 1981 (Attachment 1) requested a copy of the Skagit Preliminary Safety Analysis Report (PSAR) from the NRC Staff. NRC Staff attorney Richard Black informed Nina Bell of the Coalition on January 8, 1982 in a telephone conversation that the proper course to follow in this matter was to make the request of Puget Power, the Applicant.

Amendment 23 to the PSAR was received by the Coalition on January 10, 1982. Also received on that day was the Amendment 4 to the Skagit/Hanford Application for Site Certification/Environmental Report (ASC/ER) as amended. Upon review of the received PSAR we noticed that sections that were not amended were not included. So, on February 19, 1982, Ms. Bell contacted Puget Power by telephone request

1982, Ms. Bell contacted Puget Power by telephone requesting a complete copy of the PSAR. Puget Power responded on February 24, 1982 that they would not supply the requested material.

On March 6, 1982 the Coalition filed an amended petition to intervene in response to the Commission's notice. The Atomic Safety and Licensing Board issued an Order on April 2, 1982, which was served on parties April 5, 1982 and received by the Coalition on April 8, 1982, granting the Coalition's petition for leave to intervene and ordering a pre-hearing conference approximately 12 days before contentions were due.

Following the Board's Order of April 2, 1982 Applicant's attorney sent a letter dated April 13, 1982 confirming matters covered in a telephone call with Ms. Bell on April 8, 1982. In its letter, Applicant agreed to supply the remainder of the PSAR. Applicant also informed the Coalition that it was filing an Amendment 5 to the ASC/ER. This material arrived at the Coalition office on April 16, 1982, (Attachment 2) four days before contentions were due.

Given this late arrival date it was impossible to review these documents and formulate any meaningful contentions.

To date the only documents filed by the NRC Staff is a Safety Evaluation Report Supplement 2 which addresses only issues related to NUREC 0718, Rev. 1. The Coalition has reviewed this document and filed contentions based on that review. However, the Coalition cannot be expected to file

file contentions on NRC documents when these documents have yet to be produced.

The Availability of Other Means Whereby the Petitioner's Interest Will be Protected

Clearly there is not other means available to petitioner outside this hearings process.

The Extent to Which Petitioner's Participation May Reasonably be Expected to Assist in Developing a Sound Record

Petitioner has already filed a number of contentions which raise substantive issues. Petitioner, in the past, has participated in previous hearings on this application and other matters before the NRC. Petitioner was in part responsible for a combined hearing on the need for power issue in the early Skagit and Pebble Springs proceedings.

Petitioner was responsible for the setting of a license condition in the Trojan Control Building case, Docket 50-344. Petitioner also presented numerous witnesses in the Trojan Spent Fuel Pool proceedings in the same docket.

The Extent to Which the Petitioner's Interest Will be Represented by Existing Parties

To date there are no other existing parties other than the Applicant and the NRC Staff. Clearly neither of these parties can represent petitioner's interest.

The Extent to Which the Petitioner's Participation Will Broaden the Issues or Delay the Proceedings

Since Petitioner is already a party to these proceedings this test does not apply. Even so, if the aforementioned

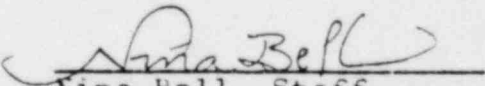
documents had been made available the issues would exist anyway. Furthermore Petitioners have already raised a number of issues and the possibility exists that no new issues will arise.

Conclusion

Given the above facts and the showing that the requirements of 10 CFR 2.711(a) and 2.714(a)(1) have been met, Petitioner Coalition for Safe Power prays that the Board in the above-captioned proceeding grant this motion for an extension of time.

Respectfully submitted,

Dated this day, the
20th of April, 1982


Nina Bell, Staff
Coalition for Safe Power