

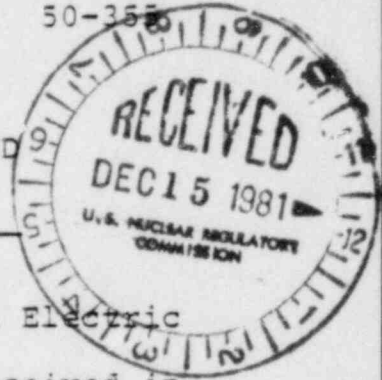
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD 10 P4:24

In the Matters of)	
)	
PHILADELPHIA ELECTRIC COMPANY <u>et al.</u>)	Docket Nos. 50-277
(Peach Bottom Atomic Power Station,)	50-278
Units 2 and 3))	
)	
)	
METROPOLITAN EDISON COMPANY <u>et al.</u>)	Docket No. 50-320
(Three Mile Island Nuclear Station,)	
Unit 2))	
)	
)	
PUBLIC SERVICE ELECTRIC AND GAS CO.)	Docket Nos. 50-354
(Hope Creek Generating Station,)	50-355
Units 1 and 2))	

OPPOSITION BY PHILADELPHIA ELECTRIC COMPANY AND
PUBLIC SERVICE GAS AND ELECTRIC COMPANY TO
FURTHER EXTENSION TO RESPOND TO ALAB-654



Today, December 7, 1981, Counsel for Philadelphia Electric Company and Public Service Electric and Gas Company received in the mail a copy of a request from intervenors, York Committee for a Safe Environment and Citizens for a Safe Environment, for an additional eight days to respond to ALAB-654. These two parties were not consulted on this request and oppose this additional extension.

The Board has already determined that the reasons previously stated in support of the earlier request were unpersuasive, and no further justification has been shown. Further delay in this lengthy proceeding is unwarranted and is all too typical of the delay by intervenors' representatives as criticized by other boards, e.g., Pennsylvania Power and Light Company (Susquehanna Steam Electric Station, Units 1 and 2), ALAB-613, 12 NRC 317, 338,

D503
50/11

340 (1980), (ECNP's filings "evidence a belief that a public interest litigant with limited finances may disregard key provisions of the Rules of Practice," which "stemmed in large measure from its erroneous ideas about an intervenor's role and obligations in NRC proceedings -- and the fact that its representatives took on far more cases than they could reasonably handle"); Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit 2), ALAB-474, 7 NRC 746, 748 (1978).

Intervenors have already had three months to provide the necessary information. Obviously, further extensions are entirely unjustified.^{1/}

Respectfully submitted,

CONNER & WETTERHAHN

Troy B Conner, Jr. / RMR

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^{1/} This opposition was served on the members of this Appeal Board panel and ECNP's representative by mailgram on December 7, 1981.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Opposition by Philadelphia Electric Company and Public Service Gas and Electric Company to Further Extension to Respond to ALAB-654," in the captioned matter, have been served upon the following by deposit in the United States mail this 8th day of December, 1981:

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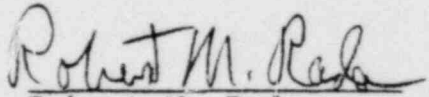
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