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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 94 JAN 31 P4:09

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In the Matter of) Docket No. 70-3070-ML)

LOUISIAN ENERGY SERVICES, L.P.) ASLBP No. 91-641-02-ML

Claiborne Enrichment Center) (Special Nuclear Materials License)

MOTION BY CITIZENS AGAINST NUCLEAR TRASH ("CANT") FOR EXTENSION OF TIME TO RESPOND TO DISCOVERY

Intervenor, Citizen's Against Nuclear Trash ("CANT"), hereby requests an extension of eighteen days, until February 11, 1994 to file supplemental responses to nine of applicant's interrogatories. Applicant has offered CANT seven additional days to respond (until January 31, 1994), but that is not sufficient, since all of CANT's time is currently being devoted to finishing comments on the Draft Environmental Impact Statement ("DEIS") in this matter -- which are due on January 28, 1994.

Pursuant to a discovery schedule worked out between CANT and the applicant, and as reflected in a February 19, 1993 order of the Atomic Safety and Licensing Board, on January 24, 1994 CANT was to supplement its responses to twelve interrogatories propounded by applicant on August 11, 1992. However, CANT did not anticipate that this deadline would fall directly in the middle of CANT's preparation of DEIS comments. CANT requested an additional ninety days to prepare its comments on the DEIS but was denied this

The twelve interrogatories are: B. 1-2; B. 1-2.1; B. 1-2.2; B. 4-2; B. 4-3; B. 4-4; B. 4-6; I. 1-b; I. 11-b; J. 3-2; J. 4-1: and J.4-2.

extension. Now CANT is virtually working around the clock to finish these comments. Accordingly, CANT requests a short extension of time to prepare these supplemental discovery responses.

Respectfully submitted,

SIERRA CLUB LEGAL DEFENSE FUND, INC. 400 Magazine Street, Suite 401 New Orleans, Louisiana 70130 Telephone: (504) 522-1394

y: Voltal

Nathalie M. Walker

Attorneys for intervenor, Citizens Against Nuclear Trash

January 24, 1994.

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 94 JAN 31 P4:11

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In the Matter of) Docket No. 70-3070-ML)

LOUISIANA ENERGY SERVICES, L.P.) ASLBP No. 91-641-02-ML)

Claiborne Enrichment Center) (Special Nuclear Materials License)

CERTIFICATE OF SERVICE

I hereby certify that copies of undersigned counsel's "Motion by Citizens Against Nuclear Trash ("CANT") For Extension of Time to Respond to Discovery has been served on this 24th day of January, 1994, as follows:

Administrative Judge
Morton B. Margulies, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Richard F. Cole
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge Frederick J. Shon Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Chief, Docketing and
Service Section

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory

By fax

By fax

By fax

By first class mail original plus 2 copies

By first class mail 1 copy

Commission
Washington, D.C. 20555

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Adjudicatory File Atomic Safety and Licensing Board Panel By first class mail 1 copy

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Respectfully submitted,

SIERRA CLUB LEGAL DEFENSE FUND, INC. 400 Magazine Street, Suite 401 New Orleans, Louisiana 70130 Telephone: (504) 522-1394

By: Nottalie M. Walker

Attorneys for intervenor, Citizens Against Nuclear Trash

January 24, 1994.