

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD 182 SEP -1 P12:56

In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket No. 50-289

TMIA MOTION FOR EXTENSION OF TIME
ON FILING BRIEF ON EXCEPTIONS
AND FOR WAIVER OF PAGE LIMITATION

TMIA requests an extension of time until October 15, 1982, for filing its brief in support of exceptions, and a waiver of the 70-page limit on such brief with a request that the page limit be extended to 140 pages. TMIA makes this request in light of the truly exceptional circumstances of this case.

The Appeal Board has ordered that briefs in support of exceptions on management issues presented in the first partial initial decision of August 27, 1981, and the third partial initial decision of July 27, 1982, be consolidated into one document. TMIA submitted 83 exceptions, 10 pages long, and 159 exceptions, 20 pages long, on the first and third PID's respectively. While TMIA is making every attempt to consolidate these exceptions into major topic areas, the task of properly developing all the complex issues considered by both decision into one 70 page document, within a

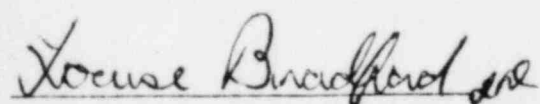
30 day time limit, is proving to be overwhelmingly difficult.

The record in this case is massive. The two PID's together total over 500 pages. In addition, this case also involves consideration of a Special Master's Report, dated April 28, 1982. These decisions all require in-depth explanation and analysis.

Further, no party will be harmed by the granting of these extensions. The Commissioners, not the Appeal Board, are making the decision on immediate effectiveness of the Licensing Board's decision, and in any event, by Licensee's own estimates, TMI-1 will not even be ready to operate until 1983, pending resolution of the psychological stress decision.

Thus TMIA requests that the parties be granted until October 15, 1982 to complete briefing exceptions on the first and third PID's, including the table of contents and table of cases required by the rules, that the 70 page limit be waived, and that TMIA be permitted a 140 page limit.

Respectfully submitted,



Louise Bradford

Dated: September 1, 1982