UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

# BEFORE THE ATOMIC SAFETY AND LICENSING BOA

In the Matter of CONSUMERS POWER COMPANY (Big Rock Point Nuclear Power Plant)

Docket No. 50-155-OLA (Spent Fuel Pool Modification) 2/29/82

## MOTION FOR EXTENSION OF TIME

Consumers Power Company ("Licensee") hereby moves this Atomic Safety and Licensing Board ("Licensing Board") to enter an order extending the deadline previously requested by Licensee in its Motion of December 3, 1982. In its December 3 Motion, Licensee requested that it be granted until December 31, 1982 to complete its evidentiary presentation on Christa-Maria Contention 9(4) which concerns emergency evacuation of persons without vehicles. This presentation is being made pursuant to the Initial Decision of September 14, 1982 in which the Licensing Board ordered Licensee to demonstrate that deficiencies concerning certain emergency planning issues have been remedied, are not serious, or are being remedied through adequate interim compensating actions. Licensee is unable to complete its evidentiary presentation by December 31 and, accordingly, requests a time extension until January 7, 1983, in which to submit the report of Stone & Webster Engineering Corporation and until January 21, 1983, to submit the affidavit of Mr. Roger Sinderman

8301040453 821229 PDR ADDCK 05000155 G PDR detailing Licensee's proposed response to the potential evacuation transportation problems which will be identified in the Stone & Webster report. In support of this Motion, Licensee states:

 As previously stated, Stone & Webster Engineering Corporation has been retained by Licensee to gather information with respect to identifying the need for any transportation assistance for all persons without vehicles in the 5-mile emergency planning zone. The final draft of the report was expected to be completed by December 31, 1982. However, Licensee has provided further comments to Stone & Webster which necessitate additional time to finalize the report. In addition, the traditional problem of coordinating work around the holidays has delayed finalization of the Stone & Webster report. The report should be available on January 7, 1982.

2. Licensee is aware of the contents of the report and is preparing to address the report's concerns when it is completed. This response will be made through an affidavit of Mr. Roger Sinderman. However, Licensee's response requires coordination with the appropriate state and local authorities. Licensee will require at least two weeks beyond the submittal of the Stone & Webster report (i.e. until January 21, 1983) to complete its consultation with state and local authorities and prepare Mr. Sinderman's

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affidavit.

3. As evidenced by its responses to date, Licensee has demonstrated good faith and due diligence in responding to the Licensing Board's Initial Decision of September 14, 1982. No party except Licensee will be prejudiced by the requested extension of time in which to complete its evidentiary presentation.

For good cause shown, Licensee's Motion should be granted.

Respectfully submitted,

Joseph Gallo Vgc

Victor G. Copeland

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#### CERTIFICATE OF SERVICE

I hereby certify that copies of CONSUMERS POWER COMPANY'S MOTION FOR AN EXTENSION OF TIME were served on Judges Bloch, Paris and Shon by Federal Express and on all other persons listed below by deposit in the United States mail, first-class postage prepaid, this 29th day of December, 1982.

Peter B. Bloch, Esquire Administrative Judge Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D. C. 20555

Dr. Oscar H. Paris Administrative Judge Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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

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