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U. S. NUCLEAR REGULATORY COMMISSION

In the matter of
C.P. Co. Midland Plant
Units 1&2

Docket Nos. 50-329 OM OL
50-330 OM OL

BEFORE THE ATOMIC SAFETY & LICENSING BOARD
1/22/81



MOTION TO EXTEND TIME FOR RELEVANT DISCOVERY

I would like to request an extension of discovery time, limited to questions which may arise related to documents in this proceeding to which I have not had access. .

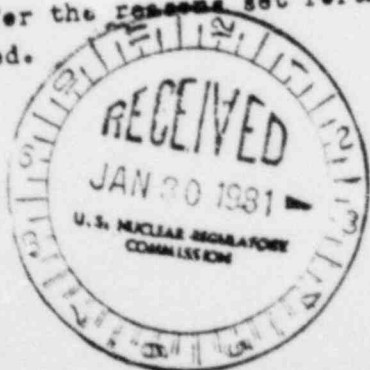
Since the ruling prohibiting provision of transcripts to intervenors, none of these documents have been available at the Midland Public Documents Room.

C.P.Co. and NRC responses to my 12/4/80 and 12/18/80 requests have been late and incomplete making follow up questions impossible by the close of discovery Jan. 23rd.

I have informally agreed with C.P.Co. attorney Alan Farnell (Dec. 31 1980 phone conversation) not to object to these delays as long as I be permitted similar flexibility in submitting further questions (12/14/81 requests) and follow up questions.

I would extend the same request to the NRC regarding questions related to document requests.

I would ask that the board allow me to ask questions on the testimony I have not seen. I would also like to discuss at the prehearing conference whether I might be permitted to check out these transcripts from the Public Documents Room for the reasons set forth in my 12/22/80 request, if that request cannot be granted.



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Respectfully Submitted
Barbara Stamiris

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