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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

THE CLEVELAND ELECTRIC
ILLUMINATING CO, et al

(Perry Nuclear Power Plant
Units One and Two)

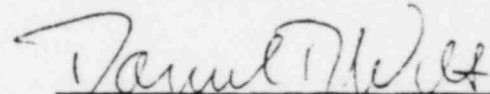
Docket Nos. 50-440-OL
50-441-OL

MOTION OF SUNFLOWER ALLIANCE INC.,
ET AL, FOR AN EXTENSION OF TIME
TO FILE BRIEF IN OPPOSITION TO
MOTION FOR SUMMARY DISPOSITION ON
QUALITY ASSURANCE

Now comes, Sunflower Alliance Inc., et al, and moves the Atomic Safety
and Licensing Board for its order granting it a two week extension to file
a Brief in Opposition to Motion for Summary Disposition on Quality
Assurance.

A Brief is attached in support of this Motion.

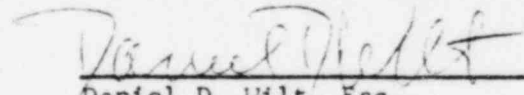
Respectfully submitted,



Daniel D. Wilt, Esq.
Attorney for Sunflower Alliance, Inc.
P.O. Box 08159
Cleveland, Ohio 44108
(216) 249-8777

SERVICE

The undersigned certifies that a copy of this Motion has been sent to
all persons on the Service List on this 22nd day of November, 1982.



Daniel D. Wilt, Esq.
Attorney for Sunflower Alliance, Inc.

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BRIEF

1. The NRC Staff has filed a Motion for Summary Disposition on the Quality Assurance Contention. The response to this Motion is due on November 23, 1982.

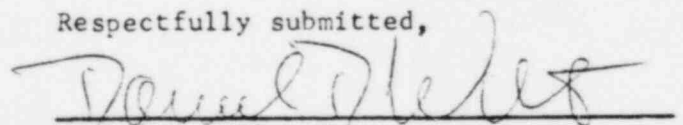
2. At a recent conference call, the undersigned did state that he would make every effort to file Sunflower's response within the 20 day period provided by the Commission's Rules. However, the undersigned cannot.

3. The reason for this request for additional time is the fact that due to the press of other business the undersigned has not had the opportunity to research the Commission's cases, Rules and Regulatory Guides on the issue of Quality Assurance. The local law library does have the CCH service on NRC cases but some of these cases are missing. The University of Akron Law Library does have the recent issuances issued by the Commission but it is located in Akron, Ohio. Since the November 10th conference call, the undersigned has been involved with a housing discrimination charge filed by HUD; has been involved with a matter with the U.S. Bankruptcy Court and has been out of town for two days.

4. The issue of Quality Assurance is critical to the public safety and welfare. Sunflower has not been unreasonable with requests for additional time in the past. Sunflower desires to effectively participate in these proceedings and asks this Board to grant it the needed time to so effectively participate. It is not the desire of Sunflower to cause delay merely to obstruct these proceedings. Sunflower does desire to be effective.

Wherefore, Sunflower prays that it be granted until December 7, 1982 to respond to Staff's Motion for Summary Disposition on Quality Assurance.

Respectfully submitted,



Daniel D. Wilt, Esq.
Attorney for Sunflower Alliance Inc.