

March 18, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATION COMMISSION

REGULATORY SERVICES
DIVISION & SERVICE
BRANCH

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)	
)	
LOUISIANA POWER & LIGHT COMPANY)	Docket No. 50-382
)	
(Waterford Steam Electric Station,)	
Unit 3))	

APPLICANT'S REQUEST FOR ENLARGEMENT
OF PAGE LIMITATION

Pursuant to section 2.762(e) of the Commission's Rules of Practice, 10 C.F.R. § 2.762(e), Applicant requests, for good cause shown, enlargement of the seventy-page limitation on its brief to be filed in opposition to the exceptions of Joint Intervenors now before the Appeal Board in this proceeding. Applicant's brief is due March 25, 1983.

On December 27, 1982, Joint Intervenors filed 86 exceptions to the Licensing Board's November 3, 1982 Partial Initial Decision. Joint Intervenors subsequently filed a brief in support of 61 of the exceptions. Applicant is unable to adequately address this large number of briefed exceptions within the seventy-page limitation set out in section 2.762(e). The hearing record in this proceeding is long, with testimony by 23 witnesses, and most of Joint Intervenors' exceptions are of the type which require extensive reference to and discussion of numerous portions of the record evidence. After allowing

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pages for introductory and background information, a seventy-page limitation for responding to 61 exceptions allows little more than one page per exception, which is inadequate to sufficiently inform the Appeal Board of the record evidence relating to the exceptions and to present argument on that evidence.

Applicant presently estimates that it will require an additional twenty pages to adequately respond to Joint Intervenors' exceptions, although we will attempt to minimize that figure to the extent feasible. Accordingly, for the foregoing reasons, Applicant requests that it be granted a waiver of the page limitations to allow its filing of a ninety-page brief in opposition to Joint Intervenors December 27, 1982 exceptions to the Partial Initial Decision.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By

Bruce W. Churchill

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Dated: March 18, 1983

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing
"Applicant's Request for Enlargement of Page Limitation"
were served by deposit in the U.S. Mail, first class, postage
prepaid, to all those on the attached Service List, except
that those marked with an asterisk were served by hand de-
livery this 18th day of March, 1983.

Bruce W. Churchill

Dated: March 18, 1983

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