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September 23, 1982

50-443

Helen F. Hoyt, Esq., Chairperson
Dr. Jerry Harbour, Administrative Judge
Dr. Emmeth A. Luebke, Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Hoyt and Members of the Board:

I am enclosing NECNP Objections to Prehearing Conference Memorandum and Order and Motion to Certify Objections to the Appeal Board.

You should be aware that the need to respond to the Board's Memorandum and Order has effectively prevented us from beginning discovery until today. As a result, we have lost more than one week of discovery from the three month period that you established, or approximately 8% of the time available.

We will begin discovery immediately. With the number of NECNP contentions that you have admitted, we expect that it will not be possible to complete discovery within the deadline that you have established, although we will make every effort to do so. Should you or the Appeal Board reinstate any of the improperly denied contentions, we will have lost so much discovery time that it will be impossible to complete discovery by December 15, 1982.

Sincerely,



William S. Jordan, III

WSJ, III:cla

Enclosure

cc: Service List

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