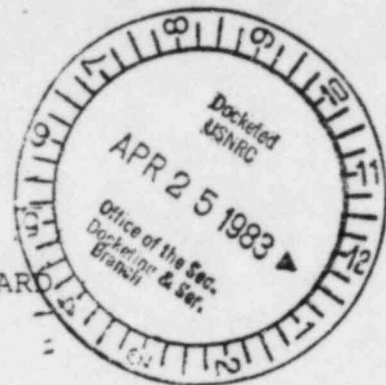


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of ( )  
HOUSTON LIGHTING & POWER ( Docket Nos. 50-498 OL )  
COMPANY, ET AL. ( 50-499 OL )  
( )  
(South Texas Project, )  
Units 1 and 2) ( )

CCANP MOTION FOR DEFERRAL OF RULINGS AND  
EXTENSION OF DEADLINES

In June 1982, Citizens Concerned About Nuclear Power (CCANP) became the only intervenor in this proceeding. Citizens for Equitable Utilities, the other intervenor at that time, withdrew from the proceeding. The State of Texas, as an "interested state," has played no active role to date in this proceeding.

For the past four years, Lanny Sinkin had the responsibility of representing CCANP. Since September 1980, Mr. Sinkin has been a student in the University of Texas School of Law. While pursuing his studies, Mr. Sinkin made every effort to provide a credible representation for CCANP in this proceeding.

Mr. Sinkin now finds himself entering the examination period for what was to be his final semester in law school. (The demands of the proceeding forced Mr. Sinkin to drop courses during the past two and a half years and, therefore, completion of his law education will not come until the summer of 1983. During this same summer, Mr. Sinkin will be preparing for the Bar Exam to be given the last week of July 1983.) Having spent many hours working on the South Texas Nuclear Project, Mr. Sinkin finds himself ill prepared for his finals.

As a result, Mr. Sinkin has left Austin and gone to a remote area with no telephone in an effort to complete papers and prepare for finals in the hopes of passing his courses this semester.

There are various rulings pending before the Board and various deadlines approaching.

First there is the CCANP motion for a new contention, defective in lacking an affidavit. Mr. Sinkin fully intended to amend the motion with an affidavit but ran out of time to do so. If the motion is denied based on the lack of an affidavit, CCANP will expend unnecessary time and resources refileing the motion with the necessary affidavit. CCANP

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therefore moves the Board to defer ruling on the motion at this time.

Second, the Applicants filed a set of interrogatories regarding the hurricane design contention. Unfamiliar with the technical details of this contention and with inadequate time available to prepare a response to the interrogatories, Mr. Sinkin has not yet filed a response. CCANP therefore moves the Board to defer any rulings on motions to compel and to extend the time for answering said interrogatories.

Third, Mr. Sinkin filed answers to Applicants interrogatories on the Quadrex issues but did not respond directly to the questions Applicants asked. Mr. Sinkin did object to answering the questions as burdensome, but the Applicants may file (or have filed) a motion to compel. CCANP further moves the Board to defer ruling on any such motion to compel and to extend the time for responding to any such motion.

Fourth, the Applicants may file a motion for summary disposition of certain aspects of the contentions to be heard in Phase II. CCANP moves the Board to defer ruling on any such motion and to extend the time for responding to any such motion.

Mr. Sinkin will complete his finals on May 12, 1983. CCANP moves that all deferrals and extensions of deadlines be granted until June 17, 1983 in order to provide Mr. Sinkin sufficient time to prepare all necessary filings.

The deferrals and extensions sought in this motion will not harm any parties to this proceeding. In Phase I, the Board completed hearings on all issues which the Board and the Commission initially decided needed to be heard on an expedited basis. Phase II contains issues which arose after the decision to hold expedited hearings (Quadrex) and an issue the Board decided should be expedited after initially excluding said issue from expeditious treatment (hurricane design). The Board, therefore, is under no mandate to move quickly to hear these issues.

Furthermore, the operational dates for the units under consideration are at least four years away. No delay in operation will result from a few months delay in this proceeding.

Finally, a denial decision in Phase I may well make the holding of further hearings either moot or premature. CCANP would certainly argue that a denial based on the Phase I record should preclude CCANP (and the Applicants) from having to spend

resources for Phase II until the appeals process is exhausted (should the Applicants appeal rather than dropping the application.)

For the above and foregoing reasons, CCANP moves the Board to defer ruling on all such motions as set forth herein and to extend the deadlines for CCANP as requested herein.

Respectfully submitted,

*Lanny Sinkin*

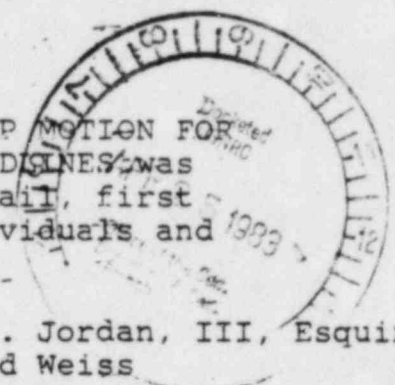
Lanny Sinkin  
Counsel for Intervenor,  
Citizens Concerned About  
Nuclear Power, Inc.  
Port Aransas, Texas

April 20, 1983

Docket Nos. 50-498 OL  
50-499 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of CCANP MOTION FOR DEFERRAL OF RULINGS AND EXTENSION OF DEADLINES was served by deposit in the United States Mail, first class postage paid to the following individuals and entities on the 20 day of April 1983.



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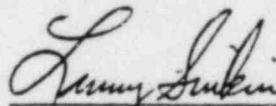
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