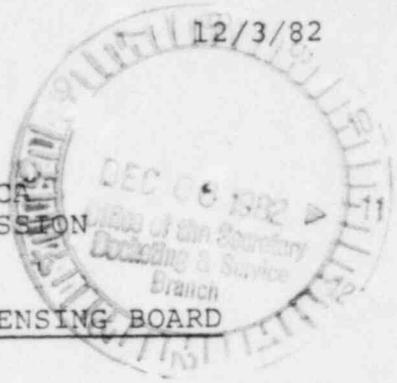


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
CONSUMERS POWER COMPANY) Docket No. 50-155-OLA
(Big Rock Point Nuclear Power Plant)) (Spent Fuel Pool
) Modification)

MOTION FOR EXTENSION OF TIME

Consumers Power Company ("Licensee") hereby moves this Atomic Safety and Licensing Board ("Licensing Board") to enter an order extending the deadline established by the Licensing Board Order of October 21, 1982. By that Order, Licensee was granted until December 3, 1982, to demonstrate that deficiencies discussed by the Licensing Board in its Initial Decision of September 14, 1982 have been remedied, are not serious, or are being remedied through adequate interim compensating actions. A partial response to the evidentiary deficiencies noted in the Licensing Board's September 14 Initial Decision is being submitted this date. This response is complete with respect to the evidentiary deficiencies associated with Christa-Maria Contention 9(2). A substantial but incomplete response is being submitted with respect to Christa-Maria Contentions 9(5), and 9(4) as this latter contention concerns the evacuation of invalids. Licensee, at this time, is unable to complete its evidentiary presentation

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on (i) Christa-Maria Contention 9(4) insofar as that contention raises the need for evacuation assistance of schoolchildren and others who may lack vehicles, and (ii) Christa-Maria Contention 9(5) insofar as that contention raises the transportation needs of individuals who may be temporarily incapacitated. Accordingly, Licensee requests a time extension to December 20 to submit evidentiary presentations on Contention 9(5) and the evacuation of schoolchildren under Contention 9(4), and to December 31, 1982 for the completion of the remainder of Contention 9(4), i.e., others who may lack vehicles. In support of the Motion, Licensee states:

1. Licensee has identified Mr. Vincent R. Olach, Business Manager for the Charlevoix Public Schools, as the only witness who can presently address the issue of evacuation of the schoolchildren of the Charlevoix Public Schools. Mr. Olach is responsible for managing the transportation services of the school district. He is also responsible for developing the plan and procedures for an emergency evacuation during a radiological incident. Thus, Mr. Olach was requested to furnish an affidavit concerning the evacuation needs of the Charlevoix Public Schools within the context of Christa-Maria Contention 9(4). Attorneys for Licensee met with Mr. Olach on November 5, 1982, for a preliminary fact-gathering session. At that time, Mr. Olach was expecting to enter the hospital within the next week for back surgery and Licensee's attorney and Mr. Olach planned to resume discussions after the surgery

on Monday, November 22 for the purpose of finalizing Mr. Olach's affidavit. On Friday November 19, Licensee's attorney called Mr. Olach to confirm the scheduled meeting. At that time, Mr. Olach informed Licensee's attorney that he had not yet gone in for surgery but that he would be available for the scheduled meeting. However, on the day of the scheduled meeting, Licensee's attorney was informed that Mr. Olach went in for surgery that day, apparently because of the limited availability of his surgeon. Licensee's attorney has since been in contact with Mr. Olach who is recovering well. Another meeting has been scheduled for a date in early December and Licensee expects to finalize Mr. Olach's affidavit in time for a December 20 submission to the Licensing Board.

2. Consistent with the Licensing Board's suggestion in its September 14 Initial Decision (slip op. p. 8), Licensee has retained Stone & Webster Engineering Corporation to gather information with respect to identifying the need for any transportation assistance for all people without vehicles in the 5 mile EPZ. Licensee has provided comments with respect to a first draft of the report. A second draft is being prepared for Licensee's further review. Licensee expects that this report can be completed by December 31, 1982.

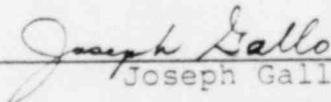
3. Licensee's evidentiary submission on the issues involving the identification and evacuation of invalids is

substantial. However, time did not permit the completion of two aspects of these issues, i.e., the identification of individuals temporarily incapacitated who may need transportation assistance and a cross-check with other organizations to assure beyond reasonable doubt that the Sheriff's list is complete and current. This effort is ongoing and Licensee expects to complete this matter in time for a December 20 submission to the Licensing Board.

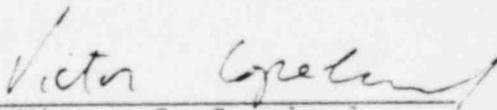
4. As recognized by the Licensing Board in its Memorandum and Order dated October 21, 1982, no other parties' interests will be adversely affected by the grant of a time extension concerning the Licensing Board's September 14, 1982 Initial Decision. Indeed, as further recognized by the Licensing Board, any adverse effects of the grant of any time extension will be felt by Licensee. (Memorandum and Order, p. 2).

For good cause shown, Licensee's Motion should be granted.

Respectfully submitted,



Joseph Gallo



Victor G. Copeland

Isham, Lincoln & Beale
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 833-9730

Isham, Lincoln & Beale
Three First National Plaza
Chicago, Illinois 60602
(312) 558-7500

Dated: December 3, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
) Docket No. 50-155-OLA
CONSUMERS POWER COMPANY) (Spent Fuel Pool
) Modification)
(Big Rock Point Nuclear Power Plant))

CERTIFICATE OF SERVICE

I hereby certify that copies of CONSUMERS POWER COMPANY'S PARTIAL RESPONSE TO ATOMIC SAFETY AND LICENSING BOARD ORDER and Consumers Power Company's MOTION FOR EXTENSION OF TIME were served on all persons listed below by deposit in the United States mail, first-class postage prepaid, this 3rd day of December, 1982.

Peter B. Bloch, Esquire
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Richard J. Goddard, Esquire
Counsel for NRC Staff
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Richard G. Bachmann, Esquire
Counsel for NRC Staff
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Herbert Semmel, Esquire
Urban Law Institute
Antioch School of Law
2633 16th Street, N.W.
Washington, D.C. 20555

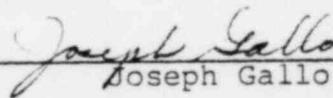
Mr. John O'Neill, II
Route 2, Box 44
Maple City, Michigan 49664

Judd Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Ms. Christa-Maria
Route 2, Box 108C
Charlevoix, Michigan 49720

Mr. James Mills
Route 2, Box 108
Charlevoix, Michigan 49720

Ms. JoAnne Bier
204 Clinton
Charlevoix, Michigan 49720



Joseph Gallo