

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
WASHINGTON PUBLIC POWER SUPPLY SYSTEM)	Docket Nos. 50-460 OL
)	50-460 CPA
(WPPSS Nuclear Project No. 1))	50-397 CPA
(WPPSS Nuclear Project No. 2))	

MOTION FOR DELAY OF PREHEARING CONFERENCE
SCHEDULED FOR JANUARY 19 and 20, 1983

On November 30, 1982 and December 1, 1982, the Atomic Safety and Licensing Board (ASLB) in the above-captioned proceedings issued Orders setting January 19 and 20, 1983 for a pre-hearing conference.

In those same Orders the ASLB directed the Intervenor, Coalition for Safe Power (hereinafter referred to as "Coalition") to file contentions as set forth in 10 CFR 2.714(b), adding that the organization should assure delivery of these contentions to the NRC Staff by January 4, 1983. The Coalition requests a delay in this schedule because it is burdensome and, in light of current circumstances surrounding construction of the plants, unnecessary.

The schedule as it is presently conceived is burdensome to intervenors due to several factors. First, encompassed in the time period allocated to the production of contentions are two major holiday periods: Christmas and New Years. Each holiday falls on a Saturday, thus making the preceeding Friday also a holiday. A total of four days are lost to intervenors in which to prepare.

Complicating this loss of days is the fact that the Coalition must rely on certain experts in framing contentions. All mail to and from these experts will be slowed given the normal state of postal service during the holiday season. Additionally, because the Applicant has re-

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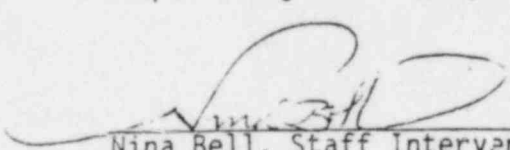
fused to provide the Coalition with a copy of the Environmental Report and the Final Safety Analysis Report, Intervenor must rely on access to the Local Public Document Room located in Richland, Washington. The Library, where the LPDR is housed, is normally closed on Fridays and will be closed on the additional two Saturday holiday days thus further limiting access to necessary documents. Intervenor further note that the U.S. Postal Service will not guarantee next-day service (using Express Mail) from Portland to Washington D.C. making it difficult to meet the Board's service requirement.

Intervenor do not believe the requested schedule change will in any way delay these proceedings. Currently a five-year moratorium has been imposed on construction work at the WNP-1 and the final date of completion has been moved to the year 1990. It is clear that a week or two delay in this pre-hearing conference will not adversely affect the Applicant's schedule for plant operation. Regarding the possible delay in the schedule for WNP-2, Intervenor point out that construction will continue despite these proceedings. Furthermore, the Commission has already taken seven months in which to rule upon the Request for Hearing and Petition for Leave to Intervenor filed by the Coalition. A few weeks delay, at the very most, cannot adversely affect any party any more than may have already occurred.

WHEREFORE, Intervenor Coalition for Safe Power prays for an Order granting this motion and causing a delay of at least one week in the pre-hearing conference schedule, and extending the deadline for the framing of contentions.

Respectfully submitted,

Dated this day the ninth
of December, 1982


Nina Bell, Staff Intervenor
Coalition for Safe Power

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CERTIFICATE OF SERVICE

I Hereby certify that copies of:

MOTION FOR DELAY OF PREHEARING CONFERENCE SCHEDULED FOR JANUARY 19
and 20, 1983

filed by the COalition for Safe Power in the above-captioned proceeding
have been served on the following parties by deposit in the United States
Mail, postage prepaid and first class, on the 9th of December, 1982.

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

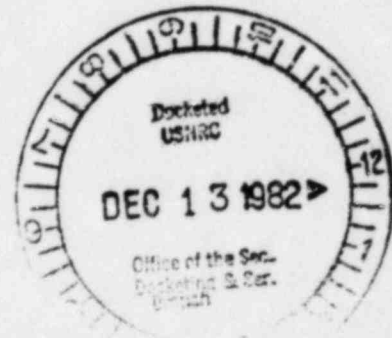
Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

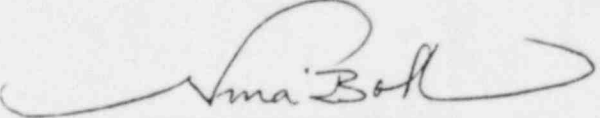
Nicholas S. Reynolds
Debevoise, Liberman et. al.
Suite 700, 1200 17th NW
Washington D.C. 20036

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

Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Dr. Jerry Harbour
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington D.C. 20555




Nina Bell, CFSP