616.

MUCLEAR REGUES (MY COMMISSION)

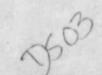
DEFORE THE ATOMIC SAFE Y AND LICENSING BOARD DOCKETED USARC

In the Matter of	(*84	JUN 11	P3:55	
HOUSTON LIGHTING AND	1	Docket	Nos.	50-498			
(South Texas Project, Units 1 and 2))			50-8690 COL SECRET BRANCH			

Citizens Concerned About Nuclear Power (CCANP) Motion for Expanded Brief on Appeal

About Nuclear Power (CCANP) requests the Appeal Board to grant CCANP an increase in the page limit of the Appeal Brief from the current seventy (70) pages. In support of this request, CCANP cites the following:

- 1. The central issue in this case is the character of the Applicants. Corporate character, either in the nuclear context or any other, is a relatively undefined concept. The Atomic Safety and Licensing Board in this proceeding asked the parties to file briefs on the meaning of corporate character prior to the initiation of the hearings. The Board spent most of the first fifty-one (51) pages of the Partial Initial Decision exploring this issue and its application in this proceeding. A major portion of the appeal CCANP is filing will of necessity be devoted to distinguishing the definition, reasure, and standard for character chosen by the ASLB from that which CCANP contends is more appropriate. This section would not normally be necessary in a case where unique legal issues had not arisen and the appeal could be limited to an expression of differences simply on the findings.
 - 2. As the Appeal Board is aware, CCANP intends to



the normal safequards for due process in an administrative proceeding. Given the difficulty of demonstrating this contention, CCANP will provide a separate section of the appeal tracing in some detail the instances and patterns of Board behavior which CCANP contends comprise the violation of CCANP's due process rights.

3. The Partial Initial Decision itself is 287 pages in length with 425 findings. There are is very little of the initial discussion or in the hundreds of findings that CCANP can agree with. Citing CCANP's differences is a matter of going into some detail on a wide variety of topics.

Given these above and foregoing circumstances, CCANP moves the Atomic Safety and Licensing Appear Board to provide CCANP an additional seventy-five (75) pages for its brief on appeal (a total of 145 pages). CCANP will do its best to use fewer pages, to be concise, and to select the most important points for discussion. Nevertheless, CCANP believes the expansion request may well be necessary.

Respectfully submitted,

Lanny Sinkin 114 W. 7th, Suite 220 Austin, Texas 78701 (512) 478-7197

Representative for Intervenor Citizens Concerned About Nuclear Power, Inc.

Dated: June 8, 1984

UNITED STATE - OF AMERICA NUCLEAR REGULT DRY COMMISSION

MITTURE THE AIDMIN SAFETY AND LIGHTING APPEAL BOARD

In the Matter of

HOUSTON LIGHTING AND FIWER CUMPANY, ET AL. (South Texas Project, Units 1 and 2) DOCKETE-

Docket Nos. 50-484 QUN 11 P3:55

DOCKETING & SERVILLE BRANCH

CERTIFICATE OF SERVICE

I horeby certify that copies of CITIZENS CONCERNED ABOUT NUCLEAR POWER, INC. (CCANP) MOTION FOR EXPANDED BRIEF ON APPEAL were served by deposit in the U.S. Mail, first class postage paid to the following individuals and entities on the 8th day of June 1984.

Alan S. Rosenthal, Esquire Chairman Atomic Safety and Lic. Appeal Ed. U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Or. John H. Buck Administrative Judge Atomic Safety and Lic. Appeal Bd. U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Charles Bechhoefer, Esquire Chairman Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. James C. Lamb, III Administrative Judge 313 Woodhaven Road Chapel Hill, North Carolina 27514

Ernest E. Hill Administrative Judge Hill Associates 210 Monteon Drive Denville, California 94526

Mrs. Peggy Bucharn Executive Director, C.E.U. Route 1, Box 1684 Brazoria, Texas 77422

William 9. Jordan, 'II, Esq. Harmon, Weiss & Jordan 2001 S Street, N.W., Suite 430 Washington, D.C. 20009

Pat Coy 5106 Casa Oro Christine N. Kohl
Administrative Judge
Atomic Saf. & Lic. App. Ed.
U. S. Nuclear Reg. Comm.
Washington, D.C. 20555

Brian Berwick, Esquire Asst. Atty. Gen. State of Texas Environmtl. Protection P. O. Box 12548, Capitol Sta. Austin, Texas 18711

Robert G. Perlis, Esquire Office of the Exec. Leg. Dir. U.S. Nuclear Regulatory Comm. Washington, D.C. 20555

Jack R. Newman, Esquire 1025 Connecticut Avenue, N.W. Washington, D.C. 20036

Melbert Schwarz, Esquire Baker and Botts 300 One Shell Plaza Houston, Texas 77002

Atomic Safety and Licensing Bd. U.S. Nuclear Regulatory Comm. Washington, D.C. 20555

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

Docksting and Service Section Office of the Secretary U.S. Nuclear Regulatory Comm. Washington. D.C. 20555

[5]