

17158

October 2, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Commissioners

In the Matter of)	
GEORGIA POWER COMPANY)	Docket Nos. 50-424-OLA-3
<u>et al.</u> ,)	50-425-OLA-3
(Vogtle Electric Generating)	Re: License Amendment
Plant, Unit 1 and Unit 2))	(transfer to Southern Nuclear)
)	ASLB No. 93-671-01-OLA-3



INTERVENOR'S REQUEST FOR CONTINUANCE TO FILE A
RESPONSE TO GEORGIA POWER COMPANY'S PETITION FOR REVIEW

Intervenor, Allen Mosbaugh, hereby requests a continuance of to file a reply to Georgia Power Company's Petition for Review of Order to Produce Attorney Notes of Privileged Communications until October 2, 1995. Intervenor requests this relief for the following reasons:

1. The attorney responsible for filing this response (Mary Jane Wilmoth, Esq.) suffered a serious and unexpected medical emergency requiring immediate medical attention. She has not been able to return to work.

2. Below-signed counsel was involved in trial preparation and was unable to direct the time necessary to file a response. Additionally, Intervenor's counsel was unexpectedly forced to divert substantial legal resources in unrelated matters associated with the O.J. Simpson murder trial (where we represented Dr. Frederic Whitehurst, who was subpoenaed and required to produce documents and provide deposition testimony in Los Angeles). Additional resources were diverted due to the fact

9510040031 951002
PDR ADOCK 05000424
G PDR

D503

that the law firm was required to make two appearances in Federal District Court in Washington, D.C. on September 28 and 29, 1995.

3. The Licensing Board has announced and the parties have agreed that the resolution of this matter will not disturb the current posture of the proceedings.

4. The briefing schedule announced in the Commission's September 13, 1995 Order required Intervenor to file an expedited response (a response would normally have been due on October 2, 1995).

For the foregoing reasons, Intervenor's counsel requests that he be granted until 11:59 p.m. today (October 2, 1995) to file a response.

Respectfully submitted,



Michael D. Kohn
KOHN, KOHN AND COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

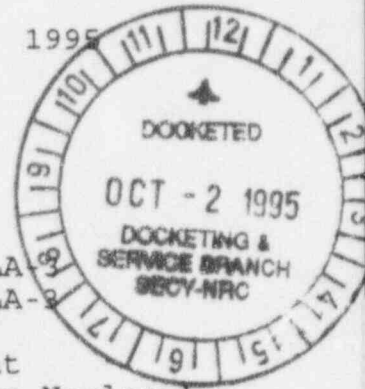
Attorneys for Intervenor

Dated: October 2, 1995

C:\FILES\301\DIXON.MOT

October 2, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)

GEORGIA POWER COMPANY)
et al.,)

(Vogtle Electric Generating)
Plant, Unit 1 and Unit 2))

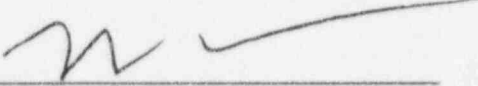
Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(transfer to Southern Nuclear)

ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

I hereby certify that the document entitled Intervenor's Request for Continuance to File a Response to Georgia Power Company's Petition for Review was transmitted via facsimile to the persons identified with an "*" in the attached service sheet and was otherwise served via first class mail on all the parties identified in the attached service sheet.



Michael D. Kohn
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663