

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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In the Matter of)
)
LOUISIANA POWER AND LIGHT COMPANY)
)
(Waterford Steam Electric Station,)
 Unit 3))

Docket No. 50-3820L

OFFICE OF SECRETARY
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BENCH

JOINT INTERVENORS' MOTION FOR LEAVE TO FILE
REPLY TO APPLICANT AND NRC STAFF'S RESPONSES
TO JOINT INTERVENORS' MOTION TO REOPEN

Joint Intervenors respectfully request leave to file this reply to Applicant and NRC Staff's Responses to Joint Intervenors' Motion to Reopen.

Joint Intervenors did not receive until January 11, 1985 a copy of SSER 9 upon which the NRC Staff relied to resolve 23 problem areas of safety significance at Waterford 3.¹ Further, Joint Intervenors' counsel has been involved in hearings on the restart of Three Mile Island, Unit 1, only recently completed in Harrisburg, Pennsylvania.

There are a number of misstatements and misleading statements made in both applicant and the NRC Staff's briefs which require correction. Moreover, filing of Joint Intervenors' reply will not prejudice any party since this Atomic Safety and Licensing Appeal Board has already indicated that it anticipates it will need several months to complete its consideration of this motion.

In consideration of the above, Joint Intervenors respectfully request leave for filing of their reply.

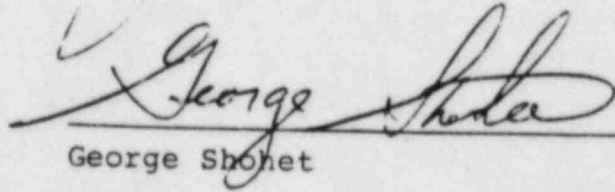
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Respectfully Submitted,



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DATED: January 25, 1985

¹Joint Intervenors were not served with a copy of SSER 9 and had to request one from the NRC Staff. The NRC Staff explicitly relied on SSER 9 in its response to Joint Intervenors' Motion but did not provide Joint Intervenors or this Appeal Board with any notice of its contents.

SSER 9 is a voluminous document which required a substantial amount of time to analyze.