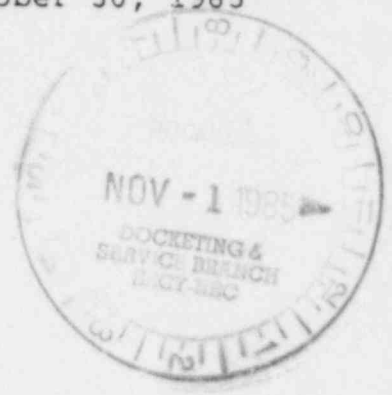


062
LILCO, October 30, 1985



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)	
)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL-3
)	(Emergency Planning Proceeding)
(Shoreham Nuclear Power Station,)	
Unit 1))	

JOINT MOTION OF LONG ISLAND LIGHTING COMPANY AND NRC STAFF FOR
EXTENSIONS OF TIME AND PAGE LIMITS ON EMERGENCY PLANNING BRIEFS
ON FACTUAL ISSUES

The Appeal Board's Memorandum and Order of June 20, 1985 deferred all consideration of extensions concerning the responsive briefs due from Long Island Lighting Company and the NRC Staff on factual issues decided by the Atomic Safety and Licensing Board's April 17, 1985 decision, LBP-85-12, 21 NRC 644, until receipt of the brief or briefs of the intervenor-appellants on these issues. Intervenor-appellants' brief, 100 pages in length as permitted by the Appeal Board's May 15 Order, was served by first class mail on October 23 after six extensions totalling some four months' duration. LILCO's responsive brief would accordingly be due on November 27 and the Staff's brief on December 9.

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LILCO requests on its own behalf, and at the request and on behalf of counsel for the Staff (Mr. Bordenick), the following extensions of time and page limits for their responsive briefs:

(1) extensions of the filing deadline of approximately two weeks, until December 13 for LILCO and December 23 for the Staff; and

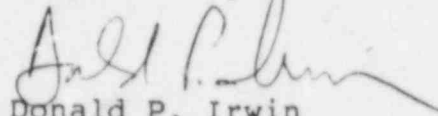
(2) extensions of the page limit for each brief from 70 to 100 pages.

Good cause exists for the requested extensions. Appellants have obtained repeated time extensions and have used the time to write a lengthy, detailed brief treating a wide spectrum of issues. Response to it will require significant record research and organization time. The extensions requested here are far shorter than those obtained by appellants.

Similarly, extension of the page limit from 70 to 100 pages is warranted. Appellants' unitary brief is replete with detailed footnotes and factual arguments. While LILCO does not believe that any of them are valid, they cannot be persuasively refuted summarily. Nor, by contrast with intervenors-appellants' situation, is any coordination or combination of briefs between LILCO and the Staff feasible, given the differences in interest and perspective between the two parties. Elemental fairness dictates that intervenors not be allowed half again as much briefing room as either LILCO or the Staff.

LILCO is authorized to state that counsel for Suffolk County (Mr. Kelley) and for the State of New York (Mr. Palomino) do not object to the requested extensions.

Respectfully submitted,



Donald P. Irwin
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Island Lighting Company

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DATED: October 30, 1985

CERTIFICATE OF SERVICE

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322-OL-3

I hereby certify that copies of LILCO's Joint Motion of Long Island Lighting Company and NRC Staff For Extensions of Time and Page Limits on Emergency Planning Briefs on Factual Issues were served this date upon the following by telecopy as indicated by one asterisk, or by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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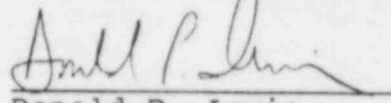
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DATED: October 9, 1985