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September 1, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

'88 SEP -6 P4:40

In the Matter of)	
)	
PHILADELPHIA ELECTRIC COMPANY)	No. 50-277 & 50-278 - OLA
)	ASLBP No. 88-569-06-OLA
(Peach Bottom Atomic Power Station,)	
Units 2 and 3))	

OFFICE OF PUBLIC AFFAIRS
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**PHILADELPHIA ELECTRIC COMPANY'S CONSENTED-TO
MOTION FOR A 60-DAY EXTENSION TO RESPOND TO
COMMONWEALTH OF PENNSYLVANIA'S CONTENTIONS**

Philadelphia Electric Company hereby requests a 60-day extension, to November 7, 1988, of its deadline to respond to the "Supplement to Petition and Statement of Contentions of the Commonwealth of Pennsylvania," filed with this Board on August 24, 1988 by first-class mail. PE's reply would otherwise be due on September 8, 1988. In support of this motion, PE states as follows:

1. The Licensing Board activated this proceeding by order dated April 8, 1988, which required the Commonwealth of Pennsylvania to file its proposed contentions by April 25, 1988.

2. In a series of consented-to motions for extension filed by the Commonwealth of Pennsylvania, the Commonwealth's deadline for filing contentions was extended to August 24, 1988. The reasons for these extensions were the expectation and conduct of a process of negotiation between PE and the Commonwealth, intended to narrow or perhaps eliminate the Commonwealth's bases of opposition to restart of Peach Bottom. Discussions and exchanges of documents relevant to them have been in progress since late spring.

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G PDR

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3. These negotiations are still in progress. On August 8, 1988, the Commonwealth submitted to PE a series of written proposals to which PE expects to reply shortly. These proposals encompass, among other things, matters contained within most if not all of the seven contentions filed by the Commonwealth on August 24.

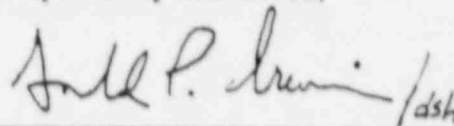
4. PE believes that the likelihood of success of these negotiations will be materially aided if it is not forced to have already pleaded a formal position in response to those contentions before negotiations continue further.

5. PE believes that the progress of the ongoing negotiations with the Commonwealth will have developed materially within 60 days from the present date. Accordingly, PE requests that the deadline for its response to the Commonwealth's contentions be extended by 60 days, to November 7, 1988.

6. PE has been authorized by Richard P. Mather, Esq., one of counsel to the Commonwealth, to state that the Commonwealth does not object to the relief sought by this motion. PE has also been authorized by Ann P. Hodgdon, Esq., one of counsel to the NRC Staff, to state that the Staff does not object to the relief sought by this motion, so long as the Staff receives a comparable extension.

WHEREFORE, Philadelphia Electric Company requests that the deadline for its response to the Commonwealth of Pennsylvania's August 24, 1988 contentions be extended by 60 days, to November 7, 1988.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Donald P. Irwin", followed by a horizontal line and the initials "dsh" to the right.

George C. Freeman, Jr.
Donald P. Irwin

Counsel for Philadelphia Electric Company

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DATED: September 1, 1988

September 1, 1988

CERTIFICATE OF SERVICE

DOCKETED
U-S-NRC

In the Matter of
PHILADELPHIA ELECTRIC COMPANY
(Peach Bottom Atomic Power Station, Units 2 and 3)
Docket Nos. 50-277-OLA and 50-278-OLA

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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I hereby certify that copies of PHILADELPHIA ELECTRIC COMPANY'S CONSENTED-TO MOTION FOR A 60-DAY EXTENSION TO RESPOND TO COMMONWEALTH OF PENNSYLVANIA'S CONTENTIONS were served this date upon the following by Federal Express, as indicated by an asterisk, or by first-class mail, postage prepaid.

John H. Frye, III, Chairman *
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Secretary of the Commission
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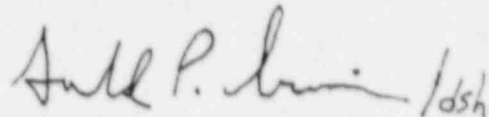
Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Adjudicatory File
Atomic Safety and Licensing
Board Panel Docket
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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DATED: September 1, 1988