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LILCO, October 5, 1988

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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Before the Commission

In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station
Unit 1)

OCCUPANY

Docket No. 50-322-0L

MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Long Island Lighting Company respectfully moves for permission to exceed the 10-page limit on petitions for review set forth in 10 CFR § 2.786(b)(2) with respect to the attached Petition for Review for ALAB-901 and Follow-On Orders, and states in support as follows:

- 1. The attached Petition for Review treats three related orders: ALAB-901 (September 20, 1988); Order (September 27, 1988); and Memorandum and Order (September 29, 1988). Review of them has been sought jointly rather than individually because their subject-matter is inter-related. If review were sought of them individually, the aggregate page limit available under the regulations would be 30 pages. Efficiencies are effected by treating the three of them together.
- 2. The matters treated in these orders -- jurisdiction over any possible litigation of the 1988 exercise, the scope of sanction authority invested in any licensing board, and the meaning of "case management in complex multi-board proceedings"

-- are complex and require more than an ordinary degree of background explanation.

For the above reasons, LILCO respectfully requests that the 10-page limit normally applicable to petitions for review be waived with respect to LILCO's Petition for Review of ALAB-901 and Follow-On Orders.

Respectfully submitted

Donald P. Irwin

Counsel for Long Island Lighting Company

Hunton & Williams 707 East Main Street P.O. Box 1535 Richmond, Virginia 23219

DATED: October 5, 1988