

November 12, 1999

United States Nuclear Regulatory Commission
Office of the Secretary
Washington, DC 20555-0001

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR 48
NRC Docket Nos. 50-295 and 50-304

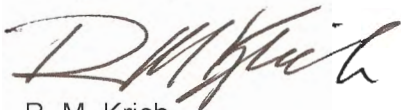
Subject: Request for Time Extension to Respond to a Petition for Intervention

In a letter to the Secretary of the Nuclear Regulatory Commission (NRC), dated October 27, 1999, Messrs. Randy D. Robarge and Edwin D. Dienethal filed a petition for intervention regarding our request for NRC approval of an exemption concerning the Zion Nuclear Power Station. Our response to this Petition is due to the NRC on November 12, 1999. Commonwealth Edison (ComEd) Company respectfully requests additional time to respond to this Petition.

Our request for this extension is warranted as the Petition does not contain a certificate of service as required by 10 CFR 2.712, "Service of papers, methods, proof." In addition, the time ComEd was given to respond to this Petition was minimal as the Petition was first received on November 10, 1999 via facsimile from Ms. Kris Cater of the NRC Office of the Secretary. Accordingly, the Petition was never properly served on ComEd and the additional time is warranted to provide ComEd the opportunity to respond to the Petition. At this time, we would suggest that the Petition be denied on the basis that the Petition does not pertain to a proceeding for the granting, suspending, revoking, or amending of a license.

If you have any questions regarding this request, please contact Robert E. Helfrich of the ComEd Law Department at 630-663-7217 or me at 630-663-7330.

Respectfully,



R. M. Krich
Vice President – Regulatory Services

cc: US NRC – Document Control Desk
Regional Administrator – NRC Region III

ComEd



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