



ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

1050 17TH STREET, N.W. SEVENTH FLOOR
WASHINGTON, D.C. 20036
TELEPHONE 202-833-9730

CHICAGO OFFICE
ONE FIRST NATIONAL PLAZA
FORTY-SECOND FLOOR
CHICAGO, ILLINOIS 60603
TELEPHONE 312-786-7500
TELEX: 2-5288

September 11, 1979

Samuel J. Chilk
Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of the Application of)
Public Service Company of Oklahoma,)
Associated Electric Cooperative, Inc.) Docket Nos. STN 50-556
and) STN 50-557
Western Farmers Electric Cooperative)
(Black Fox Station, Units 1 and 2))

Dear Mr. Chilk:

On September 5, 1979, the Applicants in the above-captioned proceeding filed a motion with the Commissioners styled as a "Motion For Commission Action." In the Motion, Applicants urge the Commissioners to accept jurisdiction, and to enter an Order which (i) rejects the demand of the President's Commission on the Accident at Three Mile Island to continue the nuclear licensing moratorium, (ii) adopts the NRC Staff's recommendation to resume licensing, and (iii) directs the Licensing Board to grant Applicants' motion to reopen the Black Fox hearing record and commence evidentiary hearings on TMI issues.

The Commission's regulations in 10 C.F.R. § 2.730 provides that answers to motions may be filed by the other parties to the proceeding within ten days except that the NRC Staff has fifteen days. An additional five days is allowed for the delay attendant to mailing. Applicants' Motion requests the Commissioners' to accept interlocutory

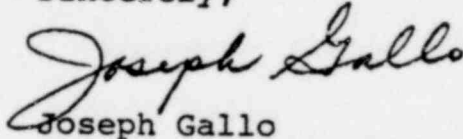
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review of a matter pending with the Licensing Board and to provide direction to that Board. In this circumstance, the Motion is procedurally unique and it is not clear that the Motion is automatically covered by 10 C.F.R. § 2.730. Therefore, Applicants request pursuant to 10 C.F.R. § 2.772(a) that you issue an Order establishing a schedule whereby the answers of the other parties and the NRC Staff would be filed within 15-days (September 20) and 20-days (September 25) respectively.

Although my letter of September 5 to the Commissioners requested that oral argument be held, the request was inadvertently omitted from the Motion itself. Hence, I reiterate our request for oral argument. Applicants believe that oral argument would facilitate decisionmaking by enabling the Commissioners through the questioning process to discern better the pedantic arguments and to reject them in favor of those which best support a course in the public interest.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Gallo".

Joseph Gallo
One of the Attorneys
for the Applicants

cc: Black Fox Service List

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

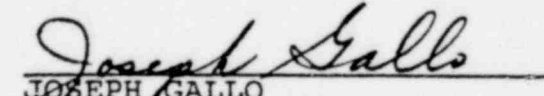
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CERTIFICATE OF SERVICE

I hereby certify that the following:

Letter to Secretary Samuel J. Chilk from
Joseph Gallo, dated September 5, 1979

in the above-captioned proceeding was served upon the
persons shown on the attached list by personal hand delivery
or by depositing copies thereof in the United States mail,
first class postage prepaid, this 11th day of September, 1979.


JOSEPH GALLO
One of the Attorneys
for the Applicants

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Chairman Joseph M. Hendrie
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Commissioner Richard T. Kennedy
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Commissioner Victor Gilinsky
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Commissioner Peter A. Bradford
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Commissioner John F. Ahearne
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Stephen S. Ostrach
Office of the General Counsel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Sheldon J. Wolfe, Esquire
Atomic Safety and Licensing
Board Panel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon, Member
Atomic Safety and Licensing
Board Panel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Dr. Paul W. Purdom, Director
Environmental Studies Group
Drexel University
32nd and Chestnut Streets
Philadelphia, Pennsylvania 19104

Richard S. Salzman, Esquire
Atomic Safety and Licensing
Appeal Board
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Dr. W. Reed Johnson
Atomic Safety and Licensing
Appeal Board Panel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Jerome E. Sharfman, Esquire
Atomic Safety and Licensing
Appeal Board Panel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary of
the Commission
United States Nuclear
Regulatory Commission
Washington, D.C. 20555
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Regulatory Commission
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Appeal Board Panel
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

L. Dow Davis, Esquire
Counsel for NRC Staff
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Joseph R. Farris, Esquire
John R. Woodard, III, Esquire
Feldman, Hall, Franden, Reed
& Woodard
816 Enterprise Building
Tulsa, Oklahoma 74103

1114 031

Mr. Clyde Wisner
NRC Region 4
Public Affairs Officer
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

Andrew T. Dalton, Esquire
1437 South Main Street
Room 302
Tulsa, Oklahoma 74119

Mrs. Carrie Dickerson
Citizens Action for Safe
Energy, Inc.
P.O. Box 924
Claremore, Oklahoma 74107

Mrs. Ilene H. Younghein
3900 Cashion Place
Oklahoma City, Oklahoma 73112

Mr. Lawrence Burrell
Route 1, Box 197
Fairview, Oklahoma 73737

Martha E. Gibbs
Michael I. Miller
Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

Mr. Maynard Human
General Manager
Western Farmers Electric Cooperative
P.O. Box 429
Andarko, Oklahoma 73005

Mr. Vaughn L. Conrad
Public Service Company of Oklahoma
P.O. Box 201
Tulsa, Oklahoma 74102

Mr. T. N. Ewing, Manager
Black Fox Station Nuclear Project
Public Service Company of Oklahoma
P.O. Box 201
Tulsa, Oklahoma 74102

Mr. M. J. Robinson
Black & Veatch
P.O. Box 8405
Kansas City, Missouri 64114

Charles S. Rogers, Esquire
Assistant Attorney General
112 State Capitol Building
Oklahoma City, Oklahoma 73105

Mr. Gregory Minor
MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125