

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

## ATOMIC SAFETY AND LICENSING BOARD

John F. Wolf, Chairman  
Dr. Robert L. Holton  
Glenn O. Bright

IN the Matter of )  
COMMONWEALTH EDISON COMPANY, et al. ) Docket Nos. S50-599  
(Carroll County Site) ) S50-600

INTERVENOR'S MOTION FOR EXTENSION OF TIME

Intervenor, the PEOPLE OF THE STATE OF ILLINOIS (Illinois), hereby requests an extension of time to file its brief in support of Contentions rejected by the Board. In support of its Motion Intervenor states:

1. Pursuant to the Board's Order of July 30, 1979, a Special Prehearing Conference was held on September 19, 1979 in the Nahman Diehl Auditorium, Intersection of U.S. 64 and Illinois Route 78, Mt. Carroll, Illinois 60153.

2. On October 10, 1979 the Board issued a Memorandum of Special Prehearing Conference and Order in which the Board set forth the contentions which were tentatively accepted for the adversary proceedings.

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3. The parties were each given thirty (30) days in which to file briefs in support of contentions rejected by the Board.

4. Intervenor received the motion on October 15, 1979. From that date 25 days remained to file a brief.

5. Attorney for intervenor has been unable to adequately research and draft a response in the 25 day period because

- a) Intervenor's Attorney has been ill and unable to work for several days, from October 23 - October 30, 1979.
- b) From October 31 to November 5 Intervenor's Attorney was attending to business in New York which had been committed to prior to October 10, 1979.

6. It would be a considerable hardship to require Intervenor to draft and file a Brief in less than one week, particularly because said brief is subject to administrative review prior to filing, which review normally requires several days.

As the Nuclear Regulatory Commission has indicated that its Draft Safety and Environmental Evaluations will not be available until June, 1980, a two week extension of time for filing Intervenor's brief will injure no party and will not unduly delay these proceedings.

WHEREFORE, the PEOPLE OF THE STATE OF ILLINOIS moves the Atomic Safety and Licensing Board to grant this Motion for Extension of Time and to allow Intervenor to file its Brief in Support of Contentions Rejected at the Pre-Hearing Conference on November 23, 1979.

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Intervenor is authorized to state that Commonwealth Edison and the NRC do not object to an extension of time so long as all parties are granted said extension.

Respectfully submitted,



SUSAN N. SEKULER  
Assistant Attorney General  
Environmental Control Division  
188 West Randolph, Suite 2315  
Chicago, Illinois 60601  
(312) 793-2491

DATED: November 6, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

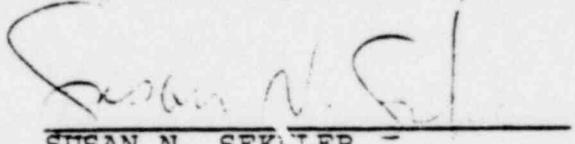
A F F I D A V I T

I, SUSAN N. SEKULER, an attorney, hereby certify the following in support of the foregoing INTERVENOR'S MOTION FOR EXTENSION OF TIME:

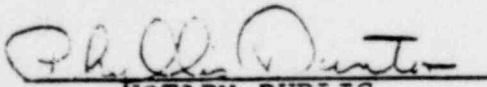
1. That I am an Assistant Attorney General with the Environmental Control Division of the Office of the Attorney General of Illinois;

2. That I am of counsel for the State of Illinois in the matter of Commonwealth Edison Co., Carroll County Site; Docket Nos. S50-599 and S50-600;

3. That all facts alleged in the MOTION FOR EXTENSION OF TIME attached hereto are true to the best of my knowledge and belief.

  
SUSAN N. SEKULER

SUBSCRIBED AND SWORN TO  
BEFORE ME THIS 5 DAY  
OF NOVEMBER, 1979.

  
NOTARY PUBLIC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY, et al.	)	Docket Nos. S50-599
	)	S50-600
(Carroll County Site)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Intervenor's Motion for Extension of Time" have been served upon the following by deposit in the United States Mail, first class, postage prepaid this 6th day of November, 1979.

John F. Wolf, Esq. Chairman  
3409 Shepherd Street  
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Thomas J. Miller  
Attorney General of Iowa  
State Capital Complex  
Des Moines, Iowa 50319

Mr. Jim Dubert  
c/o Iowa Socialist Party  
2801 1/2 West Street  
Ames, Iowa 50010

Atomic Safety & Licensing Board  
Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

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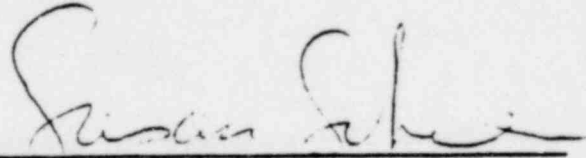
Mr. Glenn O. Bright  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
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Mr. James C. Schwab  
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A handwritten signature in cursive script, appearing to read "Susan Sekuler", written in dark ink.

SUSAN N. SEKULER

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