

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
 )  
PUBLIC SERVICE ELECTRIC ) Docket No. 50-272  
& GAS COMPANY ) Proposed Issuance of Amendment  
 ) to Facility Operating License  
(Salem Nuclear Generating ) No. DPR-70  
Station, Unit No. 1) )

NRG PUBLIC DOCUMENT NO. 1000

INTERVENOR TOWNSHIP OF LOWER ALLOWAYS CREEK  
MOTION FOR EXTENSION OF TIME TO RESPOND  
TO NRC STAFF OBJECTION TO BOARD QUESTION

The Intervenor, the Township of Lower Alloways Creek, hereby moves the Atomic Safety and Licensing Board for an Order granting an extension of time to respond to the NRC Staff Objection to Board Question which was filed on June 1, 1979 by the NRC Staff presumably under Rule 10 CFR, Sec. 2.730, which would require the Township of Lower Alloways Creek to file an appropriate response to the NRC Staff Objection within 10 days after service of same.

The Township of Lower Alloways Creek requests an extension to respond to the aforementioned NRC Staff Objection to June 26, 1979.

In support of this motion, the Intervenor, Township of Lower Alloways Creek shall rely on the attached Affidavits.

Respectfully submitted,

VALORE, McALLISTER, ARON &  
WESTMORELAND, P.A.

BY:

*Robert N. McAllister*  
ROBERT N. McALLISTER,

FOR CARL VALORE, JR., Special Nuclear  
Counsel for the Township of Lower  
Alloways Creek

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



5. Under these circumstances, it is requested that the Intervenor, the Township of Lower Alloways Creek, be granted an extension of time to June 26, 1979, to respond to the NRC Staff Objection to Board Question #3.

*Robert N. McAllister*

ROBERT N. McALLISTER,

Sworn to and subscribed to

before me this 11 day of

June, 1979.

*Mary T. Morgan*

MARY T. MORGAN  
NOTARY PUBLIC, NEW JERSEY  
MY COMMISSION EXPIRES 2-11-81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
PUBLIC SERVICE ELECTRIC )  
& GAS COMPANY )  
(Salem Nuclear Generating )  
Station, Unit No. 1) )

Docket No. 50-272

THE TOWNSHIP OF LOWER ALLOWAYS CREEK  
AFFIDAVIT IN SUPPORT OF ITS MOTION  
FOR AN EXTENSION OF TIME



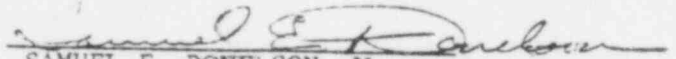
STATE OF NEW JERSEY:  
SS  
COUNTY OF SALEM:

SAMUEL E. DONELSON, of full age, being duly sworn according to law upon his oath deposes and says:

1. I am the duly elected Mayor of the Township of Lower Alloways Creek, an intervenor in the above captioned matter.
2. The Township of Lower Alloways Creek is in receipt of the NRC Staff's Objection to the Board Question #3 dealing with consideration of the effect of a Class 9 accident on the Salem Unit #1's spent fuel pool.
3. The NRC Staff objection was presumably filed under 10 CFR, Sec. 2.730, which would require an appropriate response to be filed within 10 days after receipt of the same.
4. The Township of Lower Alloways Creek Special Nuclear Counsel, Carl Valore, Jr., has been out of the Country from June 1, 1979 and will not return to his office until June 13, 1979.

5. The Township of Lower Alloways Creek has not had the opportunity to confer with Mr. Valore as to the appropriate course of action which should be taken by the Township of Lower Alloways Creek concerning the NRC Staff's objection to the Board Question #3 dealing with consideration of the effects of an explosion or "meltdown" at the Salem Unit #1 spent fuel pool.

6. Under these circumstances, it is requested that the Intervenor, Township of Lower Alloways Creek, be granted an extension of time to June 26, 1979, to respond to the NRC Staff's Objection.

  
SAMUEL E. DONELSON, Mayor  
Township of Lower Alloways Creek

Sworn to and subscribed to  
before me this 14th day of  
June, 1979.

  
ATTORNEY-AT-LAW

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :  
PUBLIC SERVICE ELECTRIC : DOCKET NO. 50-272  
& GAS CO. :  
(Salem Generating Station :  
Unit #1) :

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor's Township of Lower Alloways Creek Motion to Extension of Time

in the above captioned matter have been served upon the attached list by deposit in the United States mail at the post office in Northfield, N.J., with proper postage thereon, this 12th day of June , 1979.

/s/ Carl Valore, Jr.

CARL VALORE, JR., Special Nuclear Counsel for the Intervenor, the Township of Lower Alloways Creek

Dated: June 12, 1979



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Gary L. Milhollin, Esq.  
Chairman, Atomic Safety  
& Licensing Board  
1815 Jefferson Street  
Madison, Wisconsin 53711

Glen O. Bright  
Member, Atomic Safety  
& Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. James C. Lamb, III  
Member, Atomic Safety &  
Licensing Board Panel  
313 Woodhaven Road  
Chapel Hill, N. C. 27514

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

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

Barry Smith, Esquire  
Office of the Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mark L. First, Esquire  
Deputy Attorney General  
Department of Law & Public Safety  
Environmental Protection Section  
36 West State Street  
Trenton, N. J. 08625

Mark J. Wetterhahn, Esquire  
for Troy B. Conner, Jr., Esq.  
1747 Pennsylvania Avenue, N. W.  
Suite 1050  
Washington, D. C. 20006

Richard Fryling, Jr., Esquire  
Assistant General Solicitor  
Public Service Electric &  
Gas Company  
80 Park Place  
Newark, N. J. 07101

Keith Ansdorff, Esquire  
Assistant Deputy Public Advocate  
Department of the Public Advocate  
Division of Public Interest Advoc  
P. O. Box 141  
Trenton, New Jersey 08601

Sandra T. Ayres, Esquire  
Department of the Public Advocate  
520 East State Street  
Trenton, N. J. 08625

Mr. Alfred C. Coleman, Jr.  
Mrs. Eleanor G. Coleman  
35 "K" Drive  
Pennsville, N. J. 08070

Office of the Secretary  
Docketing and Service Section  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

June D. MacArtor, Esquire  
Deputy Attorney General  
Tatnall Building, P. O. Box 1401  
Dover, Delaware 19901

Mr. Lester Kornblith, Jr.  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555