

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

In the Matter of

LOUISIANA POWER & LIGHT COMPANY

Docket No. 50-382

(Waterford Steam Electric Station
Unit 3)

Operating License
Application

MOTION TO PERMIT DELAYED FILING OF INTERROGATORIES

Now before the Atomic Safety and Licensing Board comes Lyman L. Jones, Jr., counsel for the Joint Intervenors Oystershell Alliance, Inc. and Save Our Wetlands, Inc., and respectfully moves to be permitted to make a delayed filing of the Joint Intervenors' First Set of Interrogatories upon Applicant, Louisiana Power and Light Company for the following reasons:

I.

Due to severe illness and hospitalization since October 29, 1979 of counsel's law partner, it has been necessary for counsel to assume responsibility for all office clients, all pending court dates, as well as management functions of counsel's law partnership.

II.

These demands have caused counsel to be unable to process interrogatories for filing until the present.

III.

Counsel notes that the Board's ruling on admissibility of contentions dated September 12, 1979 was not received until September 17, 1979.

IV.

Filing of Interrogatories by Joint Intervenors at this date will not delay proceedings herein; further counsel for Joint Intervenors hereby waives all

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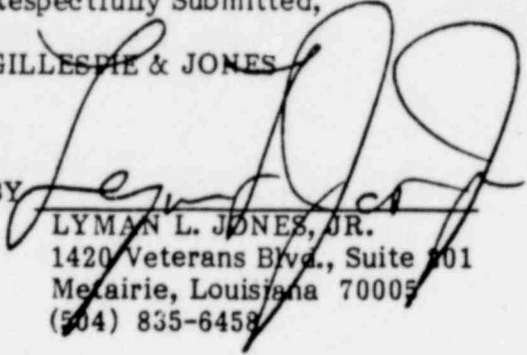
objections to requests for additional time in which to file Answers resulting from this delayed filing.

WHEREFORE, it is moved that Joint Intervenors be permitted to file the First Series Interrogatories submitted simultaneously herewith.

Respectfully Submitted,

GILLESPIE & JONES

BY


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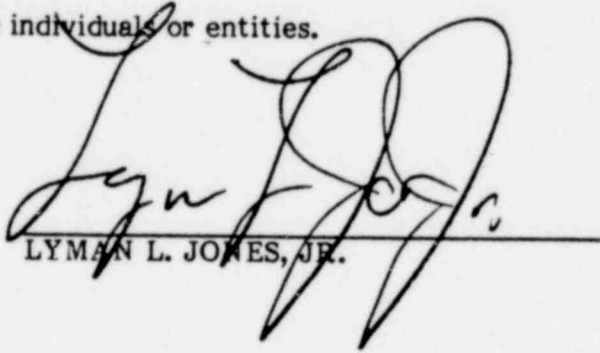
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CERTIFICATE OF SERVICE

I hereby certify that on November 23, 1979, I mailed copies of Save Our Wetlands, Inc. and Oystershell Alliance, Inc.'s, JOINT INTERVENORS FIRST INTERROGATORIES TO APPLICANT to all individuals or entities appearing on the attached Service List, postage prepaid, first class in the United States Mail.

I further certify that I have also mailed copies of the Motion to Permit Delayed Filing to the same individuals or entities.


LYMAN L. JONES, JR.

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SERVICE LIST

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