

P&W - 8-6-81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

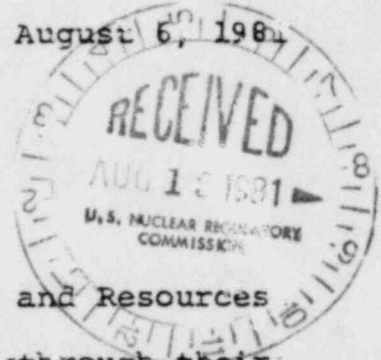
FLORIDA POWER & LIGHT COMPANY)

(St. Lucie Plant, Unit No. 2) -)

Docket No. 50-399A

Dated: August 6, 1981

CONSENT MOTION-FOR
EXTENSION OF TIME



Parsons and Whittemore, Inc. ("P&W") and Resources Recovery (Dade County), Inc. ("RRD"), by and through their undersigned counsel, submit this Consent Motion for an extension of time in which to object to or appeal from this Board's Order of August 5, 1981 denying P&W/RRD's Petition to Intervene. The extension of time requested is for an additional thirty days beyond the time specified in the Board's Order pursuant to 10 C.F.R. §§2.751a(d) and 2.714a(b).

Counsel for the following parties have been advised of this motion for a thirty day extension and have authorized counsel for P&W/RRD to state that they have given their consent to this motion:*

- 1) Douglas G. Green, Esquire
Lowenstein, Newman, Reis & Axelrad
Counsel for Florida Power & Light Company
- 2) Robert R. Nordhaus, Esquire
Van Ness, Feldman, Sutcliffe, Curtis & Levenberg
Counsel for Metropolitan Dade County, Florida

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PDR ADOCK 05000389
M PDR

* Janet Urban, Esquire is on vacation; but John Whitler, Esquire of the Antitrust Division of the U.S. Department of Justice advises that he knows of no reason why the Antitrust Division would oppose the extension of time requested.

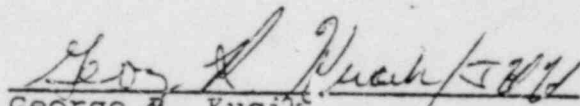
- 3) Robert A. Jablon, Esquire
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- 4) Ann P. Hodgdon, Esquire
Office of the Executive Legal Director
Counsel for the NRC Staff

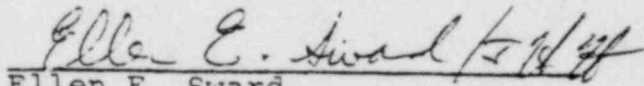
This extension of time is required because the August vacation schedule of the several counsel for P&W/RRD makes it impossible for P&W/RRD to file any objections or appeal within the five or ten day time period allowed. Because counsel for the parties involved have consented to this motion, there will be no prejudice arising from a thirty day extension.

CONCLUSION

P&W/RRD's Consent Motion for an Extension of Time should be granted and P&W/RRD should be given an additional thirty days in which to file objections to, or an appeal from, this Board's Order of August 5, 1981, with the parties then to have a corresponding time to file a response, if any.

Respectfully submitted,


George J. Kucik


Ellen E. Sward

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Counsel for P&W/RRD

August 6, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
)
FLORIDA POWER & LIGHT COMPANY)
)
(St. Lucie Plant, Unit No. 2))

I hereby certify that copies of the foregoing Consent Motion for Extension of Time were served upon the following persons via first class mail or by hand*, postage prepaid, this 6th day of August, 1981.

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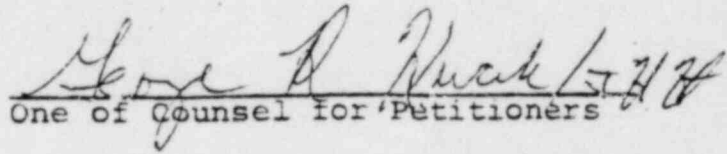
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