

November 2, 1978

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)

UNION ELECTRIC COMPANY)

(Callaway Plant, Units 1 and 2))

Construction Permits Nos. CPPR-139
CPPR-140

MOTION FOR EXTENSION OF TIME
TO FILE APPEAL BRIEF

Union Electric Company hereby moves the Atomic Safety and Licensing Appeal Board for a two-day extension of time for filing its appeal brief in support of its Exceptions to the Licensing Board's Initial Decision On Order To Show Cause, dated September 28, 1978. The Exceptions of Union Electric Company were filed on October 6, 1978. Pursuant to the schedule announced in the September 28 Initial Decision, Union Electric Company's appeal brief is due on November 6, 1978; the present motion seeks an extension of the November 6 filing date to and including November 8, 1978.

The two-day extension of time is necessary in order to complete the appeal brief being prepared in support of Union Electric Company's Exceptions. This effort has been delayed only because the undersigned counsel has been involved in other unrelated matters which have necessarily prevented him from devoting his full time and attention to the brief in question, including a court trial which has just concluded and the

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preparation by November 3, 1978 of comments recently requested by another Atomic Safety and Licensing Appeal Board in a different proceeding.

This request for more time has intentionally been held to the fewest possible days in light of the express desire of the Appeal Board and all parties to expedite consideration of the instant matter to the fullest extent practicable. It is respectfully submitted that an allowance of two extra days in the current briefing schedule will not undermine that objective. The undersigned counsel has been authorized to communicate to the Appeal Board that neither the NRC Staff nor the Intervenor opposes this request.

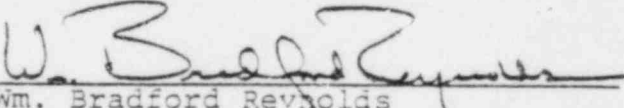
WHEREFORE, Union Electric Company respectfully moves that it be granted a two-day extension of time within which to file its appeal brief, to and including November 8, 1978.

Dated: November 2, 1978.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:


Wm. Bradford Reynolds
Gerald Charnoff

Counsel for Union Electric Company

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing
"Motion For Extension Of Time To File Appeal Brief" were served
upon each of the following, delivering by hand copies to those
in the Washington, D. C. area, and mailing copies, postage pre-
paid, to all others, all on this 2nd day of November, 1978:

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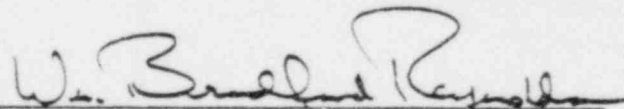
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By:


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