

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of
METROPOLITAN EDISON COMPANY
(Three Mile Island Nuclear
Station, Unit 1)

Docket No. 50-289
(Restart)

JOINT MOTION BY TMLA AND THE AAMODTS
TO REQUEST AN EXTENSION OF TIME FOR FILING BRIEFS
IN SUPPORT OF EXCEPTIONS TO THE PARTIAL INITIAL DECISION ON MANAGEMENT ISSUES

TMIA and the Aamodts hereby request an extension of an additional 30 days for filing briefs in support of exceptions to the partial initial decision on management issues. This request is made for the following reasons.

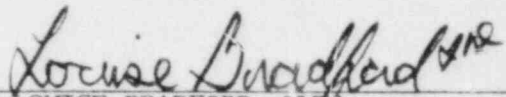
Both TMLA and the Aamodts have filed exceptions to the partial initial decision. Both are unfunded intervenors with extremely limited time and resources. Both are also currently participating in the reopened Atomic Safety and Licensing Board hearing examining incidents of cheating on NRC and Licensee exams. The hearings are set to begin November 10, 1981, and are expected to last at least three weeks. Discovery has been proceeding at an intensely expedited pace, requiring TMLA and the Aamodts to already devote a great deal of time and resources to the reopened hearings. By November 2, 1981, TMLA and the Aamodts will be required to file trial plans. Once the hearings begin, TMLA and the Aamodts will be required to devote all their time to attending hearings and preparing cross-examination. Thus, given the extremely limited time and resources available, TMLA and the Aamodts will be literally unable to prepare adequate briefs in support of exceptions within the current 30 day deadline.

This extension is particularly necessary in this case in light of the voluminous record developed during nine months of hearings, and the extreme length of the ASLB which must be appealed.

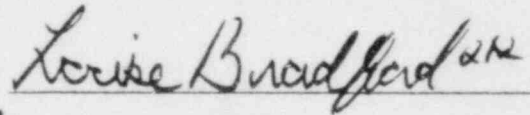
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Therefore, TMIA and the Aamodts respectfully request an additional 30 days to file their briefs in support of their exceptions to the partial initial decision, or such additional time beyond that which the Appeal Board deems fair and proper.

Respectfully submitted,


LOUISE BRADFORD, TMIA

Dated: October 26, 1981


MARJORIE M. AAMODT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)	
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METROPOLITAN EDISON COMPANY)	Docket No. 50-289
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CERTIFICATE OF SERVICE

I hereby certify that copies of the attached TMIA'S EXCEPTIONS TO THE PARTIAL INITIAL DECISION ON MANAGEMENT ISSUES, & JOINT MOTION BY TMIA AND THE AAMODTS REQUESTING AND EXTENSION OF TIME FOR FILING BRIEFS IN SUPPORT OF EXCEPTIONS TO THE PARTIAL INITIAL DECISION ON MANAGEMENT ISSUES was served this 26th day of October, 1981, by deposit in the U.S. Mail, first class postage prepaid to the parties identified on the attached Service List.

Louise Bradford
LOUISE BRADFORD, TMIA

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
Metropolitan Edison Company,)
Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289
(Restart)

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