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May 18, 1982

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)		
AND NORTH CAROLINA MUNICIPAL)	Docket Nos.	50-400 OL
POWER AGENCY NO. 3)		50-401 OL
)	
(Shearon Harris Nuclear Power)		
Plant, Units 1 and 2))		

APPLICANTS' MOTION FOR
EXTENSION OF TIME

On April 2, 1982, the Atomic Safety and Licensing Board issued an Order (Scheduling Prehearing Conference and Establishing Certain Filing Deadlines). The Order provided, inter alia, that supplements to petitions to intervene setting forth specific contentions were to be served by May 14, 1982. Applicants were to respond to the supplements by May 28, 1982, and the Staff's response is to be served by June 5, 1982. A special prehearing conference is scheduled for June 14-15, 1982.

Applicants have now received supplements from the following seven petitioners: Chapel Hill Anti-Nuclear Group Effort, Conservation Council of North Carolina, Kudzu Alliance, Citizens Against Nuclear Danger, Richard D. Wilson, Phyllis Lotchin and Wells Eddleman. The two other petitioners, Daniel Read and

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Environmental Law Project, have filed motions to consolidate with CHANGE.

In total, the petitioners' supplements include approximately 300 proposed contentions for litigation in this proceeding. The supplemental petition by Mr. Eddleman alone, which is 250 pages in length, includes several motions and other requests for relief, in addition to 153 enumerated "contentions."

The next ten days simply are inadequate for Applicants' counsel and technical personnel to prepare responses to these voluminous supplements. Yet, we strongly feel that complete written responses are essential to the Licensing Board's consideration of the supplemental petitions and to an efficient special prehearing conference.

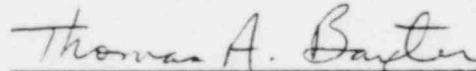
Consequently, Applicants move for an extension of the time within which they may respond to the supplemental petitions, to the date established for the filing of the NRC Staff's response. The undersigned has discussed this motion with Mr. Treby, counsel for the Staff, who has authorized me to represent that the Staff has no objection to the proposed simultaneous filing of the Applicants' and Staff's responses.

The date established for the service of the Staff's response-- June 5, 1982--is a Saturday. We assume that this is a typographical error in the Licensing Board's Order, and that the date should be either Friday, June 4, or Monday, June 7. The Staff and Applicants, of course, would prefer June 7. Applicants would arrange

for hand delivery of their responses to the Licensing Board on that date, which would be equivalent to or better than mail service on June 4 or 5. We would also undertake to expedite service on the petitioners.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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Dated: May 18, 1982

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Motion for Extension of Time" were served this 18th day of May, 1982, by hand delivery to those persons whose names appear below with an asterisk (*) preceding their names, and by deposit in the United States mail, postage prepaid, upon all other persons whose names appear below.

- * James L. Kelley, Chairman
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- * Mr. Glenn O. Bright
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