

# Natural Resources Defense Council, Inc.

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July 28, 1982

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415 421-6561

The Honorable Gustave A. Linenberger  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East West Highway, 4th Floor  
Bethesda, Maryland 20814

DOCKET NUMBER 50-531  
PROD. & UTIL. FAC.

Dear Judge Linenberger:

We are in receipt of your telegram of July 28, 11:35 A.M. It asserts that NRDC would deliver two pleadings to the Board on July 27, 1982 and July 28, 1982 and states that the Board "agreed to consider these before ruling on Applicants' motion if they are promptly received."

Our pleading of July 27, 1982 was hand-delivered on that date. I believe that the record will show that NRDC stated twice that it would undertake to do all that was humanly possible to get the second pleading in your hands by July 28 but that we could not promise delivery that day.

In view of the fact that the NRDC pleading of yesterday, July 27, 1982, "Motion to Reschedule Hearings" constituted a detailed 30-page memorandum of law, NRDC was unable to also complete its second pleading, which is also substantial, for delivery on July 28. It will be delivered to you tomorrow. As we indicated to you in the conference call yesterday, this pleading raises important issues of the scope of the hearing that go far beyond scheduling. Since we have spent much time and effort in presenting these arguments, and since they are occasioned by a document we received only one week ago, we believe it is only reasonable to expect the Board to consider them.

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The Honorable Gustave A. Linenberger  
July 28, 1982  
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The substance of this letter has been conveyed to Judge Linenberger by telephone today.

Respectfully submitted,

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Council, Inc.  
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cc: Service List