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the future course of this proceeding. Licensee and the NRC Staff attended but no representative of GLEA appeared. The Staff moved to dismiss GLEA for its failure to appear. (Tr. 206-208).

At the close of the September 21, 1982 prehearing conference the Board indicated that it would issue an Order to GLEA to Show Cause why this proceeding should not be dismissed for want of prosecution by GLEA. Such an Order was in fact issued on September 23, 1982. In addition, at the prehearing conference the Board directed Licensee to file within two weeks this motion formally setting forth Licensee's request for an indefinite deferral of this proceeding. The Board indicated that it would rule first on whether this proceeding should be dismissed due to GLEA's lack of prosecution; if the proceeding is not to be dismissed on this ground, the Board will consider whether to grant or deny Licensee's motion for an indefinite deferral. (Tr. 212-213).

The considerations underlying Licensee's request for an indefinite deferral of this proceeding have been set forth in Licensee's response to this Board's Order dated June 23, 1982 and were thoroughly explored by the Board in the September 21, 1982 prehearing conference. They need not be extensively rehearsed here. The need for steam generator replacement has been alleviated due to the better than expected corrosion performance of the steam generator tubes in recent years. (Tr. 179-180). Unfortunately, there are substantial uncertainties in predicting the future rate of

corrosion in the Palisades steam generators. These uncertainties are compounded by the failure of two tubes in March, 1982 due to a kind of corrosion never before observed at Palisades. (Tr. 180-82) The first time Licensee is likely to have substantially more information concerning the corrosion mechanism which caused these steam generator tube failures will be in 1984, after the results of steam generator tube inspections made during the next refueling outage become available. Licensee is making every effort to prolong the life of the steam generators at Palisades. (Tr. 179) Licensee does not want to commit to the substantial expense and occupational exposure associated with replacing the steam generators until such time as it becomes necessary. (Tr. 185, 189).

Under the circumstances, Licensee is unable to predict with confidence the probable future date of replacement of the Palisades steam generators. The Company respectfully requests that this proceeding be deferred indefinitely, if it is not dismissed due to GLEA's lack of prosecution. Such a deferral, rather than withdrawal of the application, would appear to be of some advantage to Licensee in the event that the rate of corrosion damage accelerates in the future, requiring speedy processing of its application. The primary advantage lies in the fact that the initial stages of an NRC adjudicatory proceeding have already been accomplished and would not need to be repeated, thus avoiding unnecessary delay.

It should be clear from this motion, and from Licensee's statements at the prehearing conference, that the delay in this docket has been and continues to be the responsibility of the Licensee. It is not attributable to any lack of diligence on the part of the NRC.

Respectfully submitted,

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My Commission Expires January 14, 1965

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