

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

83 FEB 22 P2:20
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)

(Shearon Harris Nuclear Power)
Plant, Units 1 and 2))

Docket No. 50-400 OL
50-401 OL

MOTION OF CHANGE, CCNC, WELLS EDDLEMAN AND
KUDZU ALLIANCE FOR EXTENSION OF TIME TO
RESPOND TO APPLICANTS' INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO
JOINT INTERVENORS (FIRST SET)

The four Intervenors listed above respectfully request that they be granted an extension of time in which to respond to applicants' interrogatories and request for production of documents regarding Joint Contentions IV, V, and VI. In support of this request, Intervenors show the Board the following:

1. Intervenors and Applicants have agreed that, with respect to the Joint Contentions, unified sets of discovery requests and responses to discovery requests would be filed jointly by the four Intervenors.

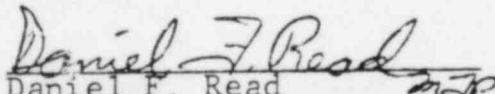
2. Although the Certificate of Service with regard to this discovery request indicates that it was mailed on January 31, 1983, none of the Intervenors received this document prior to February 8, 1983, and some of the Intervenors received this document on or after February 12, 1983.

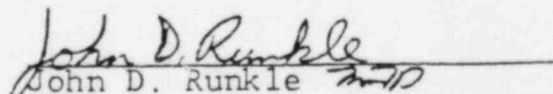
3. Intervenors have proposed to the Board that discovery be conducted sequentially according to a specific schedule to allow for the orderly development of the issues in this proceeding. If the Board adopts that suggestion, discovery with regard to environmental issues would be appropriate at this time. As Applicants and Intervenors all agree, Joint Contentions IV, V, and VI raise safety issues not environmental issues. Therefore, under our proposed discovery schedule, discovery with respect to these three contentions would not be appropriate until some time later in this proceeding.

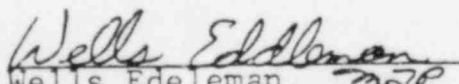
4. Simultaneously with the service of this discovery request with regard to Joint Contentions IV, V, and VI, Applicants served a substantial number of interrogatories and requests for documents on CHANGE, CCNC, and Wells Eddleman individually. Responding to those requests for production, and at the same time preparing unified response to the discovery with regard to the Joint Contentions, presents an undue burden to Intervenors.

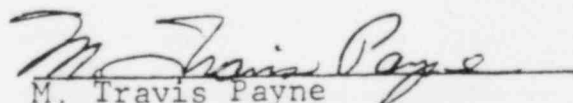
WHEREFORE CHANGE, CCNC, Wells Eddleman, and Kudzu Alliance respectfully request that the time in which they must respond to Applicants' discovery request be extended up to and including 15 days after a formal ruling on our proposed discovery schedule.

This the 16th day of February, 1983.


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CERTIFICATE OF SERVICE

This is to certify that the foregoing document was ~~the~~ FEB 22 P2:20
day served upon all parties by placing it in the United States
Mail, postage prepaid, addressed as follows:

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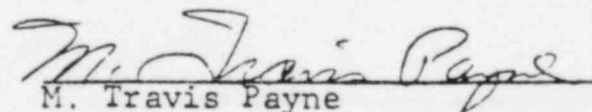
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This the 16th day of February, 1983.


M. Travis Payne