

DOCKETED
USNRC
October 12, 1983

'83 OCT 14 A10:49

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382
)
(Waterford Steam Electric Station,)
Unit 3))

APPLICANT'S RESPONSE TO NRC STAFF'S MOTION
FOR FURTHER EXTENSION OF TIME

By Motion dated October 7, 1983 the NRC Staff has requested that the time for filing its response to Joint Intervenors' Motion to Reopen Contention be extended from October 11, 1983 to November 21, 1983. Applicant appreciates the necessity for completion of the Staff's technical review prior to filing its answer, and therefore does not oppose the Staff's motion. We do, however, have a concern about scheduling.

Applicant is now realistically targeting March 31, 1984 for Waterford 3 fuel load, with an officially scheduled fuel load date of May 31, 1984. Consideration of a motion to reopen the record at this late date is therefore of obvious concern to Applicant. Applicant has already, of necessity, obtained delay in the dates for responding to the motion in order to have available to the parties and the Appeal Board an engineering report on the subject matter of the motion. However, that

report was distributed on September 20 and we would hope that the Staff could complete its review on an expedited basis. (We expect that a second report by the same engineering firm which Applicant anticipates making available to the Staff shortly will be viewed by the Staff as beyond the subject matter of the Motion to Reopen and thus not impact on their review of the earlier report.) Counsel for the Staff has stated that he will attempt to file sooner than November 21 if possible.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

Ernest L. Blake, Jr.

Bruce W. Churchill, P.C.
Ernest L. Blake, Jr., P.C.

Counsel for Applicant

1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

Dated: October 12, 1983

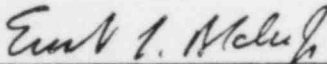
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)	
)	
LOUISIANA POWER & LIGHT COMPANY)	Docket No. 50-382
)	
(Waterford Steam Electric Station,)	
Unit 3))	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicant's Response To NRC Staff's Motion For Further Extension Of Time" were served by deposit in the U.S. Mail, first class, postage prepaid, to all those on the attached Service List this 12th day of October, 1983.



Ernest L. Blake, Jr., P.C.

Dated: October 12, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382
)
(Waterford Steam Electric)
Station, Unit 3))

SERVICE LIST

Christine N. Kohl Administrative Judge Chairman, Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Sheldon J. Wolfe Administrative Judge Chairman, Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555
W. Reed Johnson Administrative Judge Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Harry Foreman Administrative Judge Atomic Safety and Licensing Board Director, Center for Population Studies Box 395, Mayo University of Minnesota Minneapolis, MN 55455
Howard A. Wilber Administrative Judge Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Walter H. Jordan Administrative Judge Atomic Safety and Licensing Board 881 West Outer Drive Oak Ridge, TN 37830
Sherwin E. Turk, Esquire Office of the Executive Legal Director U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Docketing & Service Section (3) Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555
Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555	Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

LP&L
Service List-ASLAB
Page Two

Mr. Gary Groesch
2257 Bayou Road
New Orleans, LA 70119

Brian Cassidy, Esquire
Federal Emergency Management
Agency
Region I
422 J. W. McCormack
Boston, MA 03109

Carole H. Burstein, Esquire
445 Walnut Street
New Orleans, LA 70118

Luke B. Fontana, Esquire
824 Esplanade Avenue
New Orleans, LA 70116

Spence W. Perry, Esquire
Federal Emergency Management
Agency
Office of the General Counsel
500 C Street, S.W., Room 840
Washington, D.C. 20472