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May 2, 1995

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before Administrative Judges:  
Peter B. Bloch, Chair  
Dr. James H. Carpenter  
Thomas D. Murphy

In the Matter of )

GEORGIA POWER COMPANY )  
et al., )

(Vogtle Electric Generating )  
Plant, Unit 1 and Unit 2) )

Docket Nos. 50-424-OLA-3  
50-425-OLA-3

Re: License Amendment  
(transfer to Southern Nuclear)

ASLBP No. 93-671-01-OLA-3

INTERVENOR'S MOTION FOR AN ENLARGEMENT OF TIME

COMES NOW, Allen L. Mosbaugh, Intervenor in the above captioned matter, and requests this honorable Licensing Board to grant him an enlargement of time to respond to Georgia Power Company's Motion To Strike Partially Intervenor's Prefiled Testimony. Intervenor request that he be allowed to file his response on Monday, May 8, 1995, at noon, this would amount to an extension of less than one business day. Intervenor makes this request for the reasons stated below:

I.

INTRODUCTION

At the April 7, 1995 status conference the Board and the parties agreed to a schedule for the filing by Licensee of a motion to strike Intervenor's prefiled testimony and deadlines for the other parties to respond. Intervenor agreed to deadline of May 5, 1995 and Staff to a deadline of May 9, 1995, noon.

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Licensee filed its motion to strike on April 25, 1995.

II.

DISCUSSION

Intervenor has good cause and should be granted an enlargement of time for the following reasons:

1. Licensee has requested the Board to strike approximately 166 pages of Intervenor's Prefiled Testimony. Responding to this motion to strike is an enormous task on which Intervenor's counsel has been working diligently. However, the amount of testimony Licensee is seeking to strike is far more than Intervenor originally had anticipated when agreeing to the schedule. Therefore, Intervenor's counsel does not believe he has adequate time to respond.
2. Intervenor's lead counsel, Mr. Michael D. Kohn, has had to spend a majority of his time out of the office due to matters relating to the impending birth of his child. This includes a false alarm on May 2, which kept Mr. Kohn out of the office for the entire day.

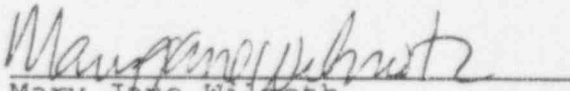
The other parties will not be harmed by this enlargement as all the responses will be received by the Board by May 9, 1995, as was intended by the schedule. Furthermore, this enlargement will not cause a delay in the proceeding.

III.

CONCLUSION

For the above stated reasons, Intervenor respectfully request that his motion for an enlargement of time be granted.

Respectfully submitted,

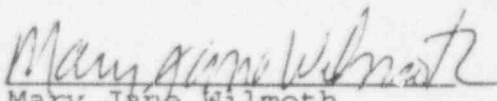
  
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Attorneys for the Intervenor

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CERTIFICATE OF SERVICE

I hereby certify that the above motion was served, by facsimile and first class mail upon the persons listed in the attached service list, this May 2, 1995.

  
Mary Jane Wilmoth

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