

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED
USNRC

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In the Matter of)
)
METROPOLITAN EDISON COMPANY)
)
(Three Mile Island Nuclear)
Station, Unit 1))

Docket No. 50-289
(Steam Generator Repair)

OFFICE OF SECRETARY
REGULATORY & SERVICE
BRANCH

TMIA MOTION FOR EXTENSIONS OF TIME
FOR FILING RESPONSE TO LICENSEE AND STAFF
MOTIONS FOR SUMMARY DISPOSITION

TMIA was served with motions for summary disposition by the Licensee and the NRC Staff on February 27, 1984. Pursuant to the regulations, TMIA would have 20 days, or until March 19, to serve its response. However, due to circumstances beyond our control, TMIA hereby requests an extension of time until March 30, to respond to the summary disposition motions in the above captioned case.

TMIA had not intended to request an extension so time, and regrets having to do so. We intend to oppose these motions, but for us to present the Board with responding arguments of commensurate quality and length to the Licensee and Staff motions, we clearly must obtain the advice of an expert.

Since TMIA received these motions on February 27, we have indeed been in touch with a number of people for voluntary assistance, and at least one of those individuals has expressed skepticism regarding much of what is alleged by the Licensee and Staff. However, this individual's employment situation prevents him from supplying an affidavit on TMIA's behalf.

We have not, however, been in touch with Dr. George Sih, Director of the Institute for Fracture and Solid Mechanics at Lehigh University, whom we have contacted in the past for voluntary assistance, because Dr. Sih will be out of town until around March 19. Some statements contained in these motions respond to, and directly contradict Dr. Sih's views. Dr. Sih is an extremely busy person, and his voluntary assistance, limited though it has been, has been invaluable to TMIA. It is just possible that he will have the time to provide TMIA with an affidavit refuting a number of Licensee and NRC Staff assertions regarding the lack of material facts on these contentions.

TMIA believes it would be fundamentally unfair to deny us that opportunity, since these motions, if granted, would amount to a denial of our right to participate in hearings altogether. Any prejudice which the Licensee or the Staff could allege may result from an 11 day extension pales by comparison to the possible consequences which TMIA would suffer if it is denied the opportunity to contact Dr. Sih.

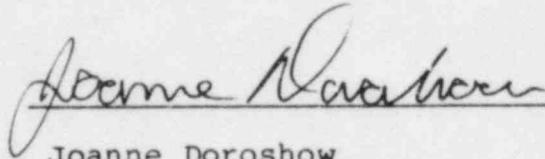
Thus, we request until the 30th of March to serve our answers opposing the Licensee and Staff motions. We will, however, make a good faith effort to serve our response as soon after March 19 as possible.

We apologize for any inconvenience this may cause the Board or the parties.

Respectfully,

Three Mile Island Alert, Inc.

By

A handwritten signature in cursive script, appearing to read "Joanne Doroshow", written over a horizontal line.

Joanne Doroshow
Louise Bradford

March 10, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
METROPOLITAN EDISON COMPANY)
(Three Mile Island Nuclear)
Station, Unit No. 1))

Docket No. 50-289

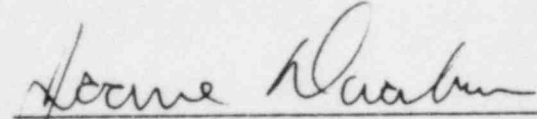
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached TMIA MOTION
FOR EXTENSIONS OF TIME FOR FILING RESPONSE TO LICENSEE AND
STAFF MOTIONS FOR SUMMARY DISPOSITIONL dated March 10,
1984, were served this 10th day of March 1984, by deposit in
the U.S. Mail, first class, postage prepaid, or, hand
delivered where possible on March 10 1984, to those on the
attached service list.


JOANNE DOROSHOW

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
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METROPOLITAN EDISON COMPANY, <u>ET AL.</u>)	Docket No. 50-289-OLA
)	ASLBP 83-491-C4-OLA
(Three Mile Island Nuclear)	(Steam Generator Repair)
Station, Unit No. 1))	

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