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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING APPEAL BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Administrative Judges:

Christine N. Kohl, Chairman
Dr. W. Reed Johnson
Howard A. Wilber

March 28, 1984

In the Matter of

LOUISIANA POWER & LIGHT COMPANY

Docket No. 50-382 OL

(Waterford Steam Electric Station,
Unit 3)MOTION FOR EXTENSION OF TIME

Now before this Honorable Appeal Board, through undersigned counsel, comes Gary Groesch, Chairman of Waterford 3 Joint Intervenors, who with respect asserts that the delay assigned for perfecting his case was insufficient and considerably more time should be given, for these reasons, to-wit:

1. Intervenor was presented with the untenable choice of filing an incomplete motion timely or a complete one untimely, leading to a dismissal with prejudice of his motion in either event. Surely it was not the intent of Congress in passing the Atomic Energy Act that prospective intervenors be presented with such a choice.
2. Co-Counsel Luke Fontana is currently inactive in the intervention, and the undersigned co-counsel has had no experience either in the procedural or the technological aspects of practice before the NRC; thus, she has asked Chairman Groesch to associate experienced

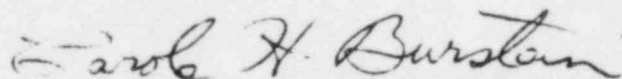
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counsel in Washington, D.C., for which negotiations are now in progress. The undersigned co-counsel has twice been hampered by spontaneous recurrent abrasions of the eye which made it impossible to travel to Taft, Louisiana to notarize affidavits. Her ophthalmologist, Dr. Robert Baxter, has advised her that more such occurrences may well be expected as a consequence of the original injury, for at least six more months.

3. Intervenor has acquiesced to an extension of time with both applicant and NRC staff, notwithstanding the superior legal, technological, and clerical facilities of both parties. It is only fair that the courtesy be reciprocated, especially since it is inconceivable at present that a delay of several months could delay licensing. It is well known that a special NRC task force is now investigating quality control and other problems at Waterford 3 and that no low-power license will be issued until their report has been evaluated. Thus, there is no prejudice to any party in a delay, and there is the advantage that an intervention now will not duplicate the work of the NRC.

WHEREFORE, mover prays for an extension of six months to file a properly documented motion in compliance with Commission requirements.

Respectfully submitted,

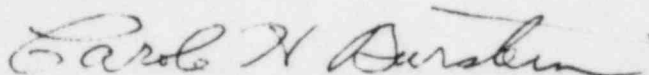


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CERTIFICATE OF SERVICE

I hereby certify that service by First Class Mail
has been made this day on the parties named on the appended list.

New Orleans, Louisiana, March 28, 1984.

A handwritten signature in cursive script, reading "Carole H. Burstein".

Carole H. Burstein
Co-Counsel for Joint Intervenors

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 OL

(Waterford Steam Electric
Station, Unit 3)

SERVICE LIST

Administrative Judge
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U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Administrative Judge
W. Reed Johnson
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Administrative Judge
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