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December 17, 1984

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 DEC 19 A11:13

Before the Atomic Safety and Licensing Appeal Board

OFFICE OF SECRETARY
OF THE NUCLEAR REGULATORY COMMISSION
& SERVICE
BRANCH

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY, <u>ET AL.</u>))	Docket No. 50-289-OLA
)	ASLBP 83-491-04-OLA
(Three Mile Island Nuclear)	(Steam Generator Repair)
Station, Unit No. 1))	

REQUEST FOR EXTENSION OF TIME

On December 10, 1984 Intervenor Three Mile Island Alert, Inc. ("TMIA") filed a brief on appeal from the Initial Decision in this proceeding and a motion to reopen the record. Applicant's responsive brief to TMIA's appeal is due on January 14, 1985, and the Staff's is due January 24. 10 C.F.R. § 2.762(c). Applicant's answer to the motion to reopen, however, is due on December 25, and the Staff's answer is due on January 31. 10 C.F.R. § 2.730(c).

TMIA has filed a single brief for both the appeal and the motion to reopen. The issues for the two filings are discussed together in the brief, with no effort to segregate them. While Applicant plans to respond to each in separate filings, for purposes of avoiding confusion in the record, the two responses should be prepared and filed together because of their interrelationship. In addition, it would be very difficult for Applicant to respond to the motion to reopen by December 25 because of the unavailability of two of the attorneys who worked on the hearing,

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the complications of the holiday season, and the need to review and assess the information contained in TMIA's supporting exhibits.

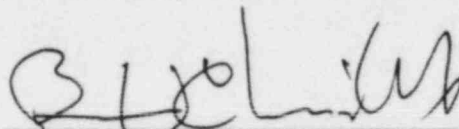
Accordingly, Applicant requests that the time for answering the motion to reopen be extended to January 14, 1985 to coincide with the due date for the responsive appellate brief.

Counsel for the Staff has advised Applicant that the Staff supports this motion and will be filing a motion of its own to commensurately extend the Staff's date for answering the motion to reopen. Counsel for TMIA has informed Applicant that TMIA does not oppose this motion.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:



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Dated: December 17, 1984

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Request For Extension of Time" were served, by deposit in the U.S. Mail, first class, postage prepaid, to all those on the attached Service List, except that those marked with an asterisk were served by hand delivery or by deposit with Federal Express, this 17th day of December, 1984.



Bruce W. Churchill, P.C.

Dated: December 17, 1984

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NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Appeal Board

In the Matter of)

METROPOLITAN EDISON COMPANY, ET AL.)

(Three Mile Island Nuclear Station,)
Unit No. 1))

) Docket No. 50-289 OLA

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