

June 10, 1985

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'85 JUN 10 P2:31

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	Docket Nos. 50-445-1,
)	50-446-1,
TEXAS UTILITIES ELECTRIC)	50-445-2 and
COMPANY, ET AL.)	50-446-2
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

APPLICANTS' MOTION TO EXTEND TIME

On May 24, 1985, the Board in the main docket described above entered a Memorandum and Order entitled "Memorandum (Case Management Plan)" in which the Applicants were directed to file, by June 15, 1985, a statement of Current Management Views that complies with the discussion contained in such Memorandum. Because of the circumstances described below, Applicants respectfully request that the time for such filing be extended to the 28th day of June, 1985. The NRC Staff has no objection to such extension. The Intervenor CASE opposes the request.

8506110343 850610
PDR ADOCK 05090445
G PDR

D903

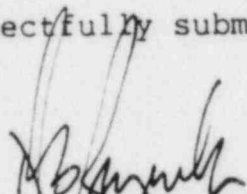
Since the receipt of the Board's May 24, 1985 Memorandum described above, the Applicants have received SSER Number 11, an extensive document dealing with quality assurance/quality control issues and concerns raised by the NRC Staff's Technical Review Team. In addition, since such time a two-day meeting has been scheduled by the NRC Staff with the Applicants, to take place in Arlington, Texas on Thursday and Friday, June 13th and 14th, 1985, at which time Applicants are to present their program for responding to all design adequacy and QA/QC issues raised by the TRT, the parties and witnesses before the ASLB, the NRC Staff, Cygna and other sources. It is Applicants' understanding that such meeting will include a number of NRC Staff management. Because of these developments, which require a substantial effort on the part of Applicants, and its counsel, time does not permit a proper and full response to this Board's request for Current Management Views.

Applicants believe that no prejudice to any party or to the proper and efficient conduct of the responsibilities of this Board will result from granting Applicants' request for extension of time. Since the request for Current Management Views was initiated by the Board itself, and not by CASE, and since any delay will not prejudice CASE, Applicants fail to see any basis for their objection.

Applicants respectfully request that their application for extension of time be granted and that they be allowed until the 28th day of June, 1985, to file the response directed in the first numbered paragraph of the Memorandum as contained on page 5 of this Board's May 24, 1985 Memorandum as described above.

Applicants further respectfully request that the Board act on this motion expeditiously.

Respectfully submitted,



Nicholas S. Reynolds
William A. Horin

BISHOP, LIBERMAN, COOK,
PURCELL & REYNOLDS
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 857-9817

Counsel for Applicants

June 10, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'85 JUN 10 P2:32

In the Matter of)	Docket Nos. 50-445-1,	
)	50-446-1,	
TEXAS UTILITIES ELECTRIC)	50-445-2, and	OFFICE OF SECRETARY
COMPANY, ET AL.)	50-446-2	DOCKETING & SERVICE
)		BRANCH
(Comanche Peak Steam Electric)	(Application for	
Station, Units 1 and 2))	Operating Licenses)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Motion to Extend Time", in the above-captioned matter was served upon the following persons by express mail (*) or deposit in the United States mail, first class, postage prepaid, or by hand delivery (**) on the 10th day of June, 1985.

**Peter B. Bloch, Esquire
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety
and Licensing Appeal
Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, Tennessee 37830

Mr. William L. Clements
Docketing and Service
Branch

* Dr. Kenneth A. McCollom
Dean, Division of
Engineering, Architecture
and Technology
Oklahoma State University
Stillwater, Oklahoma 74074

U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

**Stuart A. Treby, Esquire
Office of the Executive
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety
and Licensing Board
Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Robert D. Martin
Regional Administrator,
Region IV
U.S. Nuclear Regulatory
Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

* Mrs. Juanita Ellis
President, CASE
1426 South Polk Street
Dallas, Texas 75224

Nancy Williams
Cygn Energy Services, Inc.
101 California Street
Suite 1000
San Francisco, CA 94111

**Herbert Grossman, Esquire
Alternative Chairman
Atomic Safety and Licensing
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

* Elizabeth B. Johnson
Oak Ridge National
Laboratory
Post Office Box X
Building 3500
Oak Ridge, Tennessee 37830

Renea Hicks, Esquire
Assistant Attorney General
Environmental Protection
Division
P.O. Box 12548
Capitol Station
Austin, Texas 78711

Lanny A. Sinkin
3022 Porter Street
Suite 304
Washington, D.C. 20008

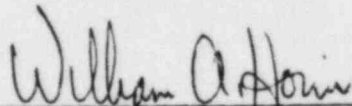
** Ms. Billie P. Garde
Citizens Clinic Director
Government Accountability
Project
1555 Connecticut Avenue, N.W.
Suite 202
Washington, D.C. 20036

**Ellen Ginsberg, Esquire
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

**Anthony Z. Roisman, Esquire
Trial Lawyers for Public
Justice
Suite 611
2000 P Street, N.W.
Washington, D.C. 20036

Mr. James E. Cummins
Resident Inspector/
Comanche Peak Electric
Station
c/o U.S. Nuclear Regulatory
Commission
P.O. Box 38
Glen Rose, Texas 76043

Joseph Gallo, Esquire
Isham, Lincoln & Beale
Suite 840
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036



William A. Horin

cc: John W. Beck
Robert A. Wooldridge, Esq.