

102  
February 14, 1986

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'86 FEB 18 AIO:31

Before the Atomic Safety and Licensing Appeal Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of  
  
THE CLEVELAND ELECTRIC  
ILLUMINATING COMPANY, ET AL.  
  
(Perry Nuclear Power Plant,  
Units 1 and 2)

)  
)  
)  
)  
)  
)  
)

Docket Nos. 50-440 OL  
50-441

APPLICANTS' MOTION FOR EXTENSION OF TIME  
WITHIN WHICH TO RESPOND TO OCRE MOTION TO  
REOPEN THE RECORD AND TO SUBMIT A NEW CONTENTION

Pursuant to 10 C.F.R. § 2.711, Applicants respectfully request an extension of the applicable time limit for responding to Ohio Citizens for Responsible Energy's Motion to Reopen the Record and to Submit A New Contention, dated February 3, 1986. Applicants request that the time limit for their response be extended one week, from February 18, 1986, to February 25, 1986.

Since receiving OCRE's motion, Applicants' personnel and expert consultants who are most knowledgeable about the January 31, 1986 Ohio seismic event have been occupied in preparing analyses and reports addressing the event, and in presenting findings to the NRC Staff. The additional time requested herein is necessary to enable Applicants to prepare a detailed and complete response to OCRE's motion, which will

8602190378 860214  
PDR ADOCK 05000440  
G PDR

DS03

incorporate the results of Applicants' recently completed analyses.

Ms. Hiatt and Ms. Woodhead have indicated to the undersigned that they do not object to the Appeal Board granting Applicants an extension of time to respond to OCRE's motion.

For these reasons, Applicants believe there is good cause for the extension requested, and respectfully request the Appeal Board to grant the instant motion.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



Jay E. Silberg, P.C.  
Harry H. Glasspiegel

Counsel For Applicants

1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1000

Dated: February 14, 1986

February 14, 1986

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'86 FEB 18 AIO:31

Before the Atomic Safety and Licensing Appeal Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

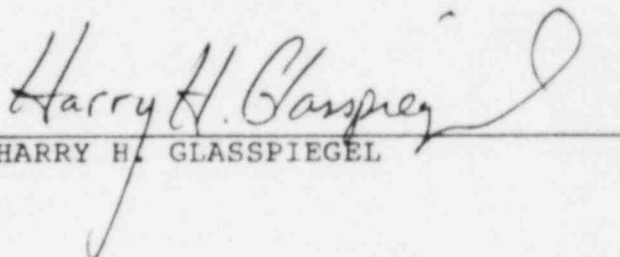
THE CLEVELAND ELECTRIC )  
ILLUMINATING COMPANY, ET AL. )

(Perry Nuclear Power Plant, )  
Units 1 and 2) )

Docket Nos. 50-440  
50-441

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing  
"Applicants' Motion For Extension Of Time Within Which To  
Respond To OCRE Motion To Reopen The Record And To Submit A New  
Contention" were served by deposit in the United States Mail,  
First Class, postage prepaid, or by hand delivery where noted  
by an asterisk on the attached Service List, this 14th day of  
February, 1986, to those on the attached Service List.

  
HARRY H. GLASSPIEGEL

DATED: February 14, 1986

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )

THE CLEVELAND ELECTRIC )  
ILLUMINATING COMPANY, ET AL. )

Docket Nos. 50-440  
50-441

(Perry Nuclear Power Plant, )  
Units 1 and 2) )

SERVICE LIST

\* Alan S. Rosenthal, Chairman  
Atomic Safety and Licensing  
Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

\* Dr. W. Reed Johnson  
Atomic Safety and Licensing  
Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

\* Mr. Howard A. Wilber  
Atomic Safety and Licensing  
Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Colleen Woodhead, Esquire  
Office of the Executive Legal  
Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

James P. Gleason, Chairman  
513 Gilmore Drive  
Silver Spring, Maryland 20901

Terry Lodge, Esquire  
Suite 105  
618 N. Michigan Street  
Toledo, Ohio 43624

Jerry R. Kline  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Ms. Susan L. Hiatt  
8275 Munson Avenue  
Mentor, Ohio 44060

Glenn O. Bright  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Donald T. Ezzone, Esquire  
Assistant Prosecuting Attorney  
Lake County Administration Center  
105 Center Street  
Painesville, Ohio 44077

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

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

John G. Cardinal, Esquire  
Prosecuting Attorney  
Ashtabula County Courthouse  
Jefferson, Ohio 44047