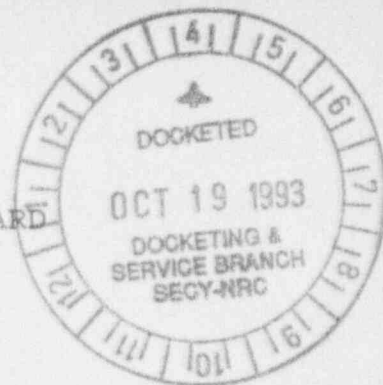


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
Pacific Gas & Electric Co.)
)
(Diablo Canyon Nuclear Power Plant,)
Units 1 and 2))
_____)

Dockets No. 50-275,
50-323 (construction - OLA-2
permit recapture)

SAN LUIS OBISPO MOTHERS FOR PEACE'S
MOTION FOR EXTENSION OF TIME FOR FILING
PROPOSING FINDINGS OF FACT AND CONCLUSIONS OF LAW

The intervenor in this construction permit recapture case, San Luis Obispo Mothers for Peace ("SLOMFP"), hereby requests an extension of two weeks, or until November 19, 1993, in which to file its proposed findings of fact and conclusions of law. Since early September, SLOMFP has been proceeding diligently to review the record of this proceeding and draft its proposed decision. However, SLOMFP is finding that the amount of time provided by the Board's order is insufficient to permit SLOMFP to fully review and integrate the many complex and technical documents which constitute the record of the case.

As members of the Licensing Board noted at various times throughout the hearing on Pacific Gas & Electric's ("PG&E's") proposed license extension, SLOMFP's case rests largely on the facts established in voluminous inspection reports and correspondence between the NRC and PG&E regarding PG&E's performance over the last several years. Many of those facts were addressed further in the hearing testimony, and therefore the documents and

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the testimony must be integrated in SLMFP's proposed findings. SLOMFP also wishes to address the specific proposed findings and arguments made in PG&E's proposed findings of fact and conclusions of law, which were filed on October 8, 1993. In all, these reports, correspondence, transcript pages, and PG&E proposed findings amount to several thousand pages. Moreover, the issues addressed in these documents are extremely technical and complex. Finally, SLOMFP does not have extensive resources at its disposal for organizing and reviewing the record and preparing proposed findings; the proposed findings are being prepared by a handful of knowledgeable SLOMFP members and their one attorney. Accordingly, although SLOMFP is proceeding as quickly as possible, it is impossible to do an accurate and thorough job of reviewing and integrating all of the documents in the record in the time allotted.

Therefore, we request an extension of two weeks, or until November 19, 1993, for filing our proposed findings of fact and conclusions of law. We note that the requested extension should have no adverse effect whatsoever on the schedule for the extension of PG&E's license, as the extension has been applied for many years in advance of the expiration dates of 2008 for Unit 1 and 2010 for Unit 2. Moreover, any inconvenience caused to any party by such an extension would be far outweighed by the benefits of permitting SLOMFP an adequate opportunity to thoroughly review this voluminous record and present a more accurate and complete set of proposed findings.

Counsel for SLOMPF consulted counsel for PG&E and the NRC before filing this motion. Counsel for PG&E stated that PG&E probably would object to SLOMPF's request for an extension. Counsel for the NRC was unable to give SLOMPF a definitive response as to whether the NRC would agree to an extension, and therefore intends to respond in writing to this motion.

Because so little time remains until November 5, SLOMPF requests that the Board give expedited consideration to this motion.

Respectfully submitted,



Diane Curran
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October 18, 1993

CERTIFICATE OF SERVICE

I certify that on October 18, 1993, copies of SAN LUIS OBISPO MOTHERS FOR PEACE'S MOTION FOR EXTENSION OF TIME FOR FILING PROPOSING FINDINGS OF FACT AND CONCLUSIONS OF LAW were served on the following parties by FAX and/or first-class mail as indicated below:

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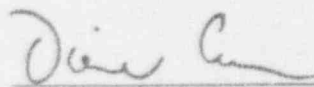
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