

September 10, 2001

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

DOCKETED  
USNRC

September 13, 2001 (5:48PM)

Before Administrative Judges:  
Thomas S. Moore, Chairman  
Charles N. Kelber  
Peter S. Lam

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In the Matter of	)	
	)	
DUKE COGEMA STONE & WEBSTER	)	Docket No. 0-70-03098-ML
	)	
(Savannah River Mixed Oxide Fuel Fabrication Facility)	)	ASLBP No. 01-790-01-ML
	)	

**GEORGIANS AGAINST NUCLEAR ENERGY'S  
MOTION FOR LEAVE TO ENTER LIMITED  
APPEARANCE BY DIANE CURRAN**

Georgians Against Nuclear Energy ("GANE") hereby moves for leave to enter a limited appearance by GANE's legal advisor, Diane Curran, for the purpose of presenting oral argument at the September 21 prehearing conference regarding GANE's Motion to Dismiss.<sup>1</sup>

The sole purpose of this request is to permit GANE's legal advisor to make arguments regarding the Motion to Dismiss. Otherwise, GANE intends to continue to represent itself *pro se* regarding issues of standing and the admissibility of contentions. GANE has asked Ms. Curran to be present at the prehearing conference to advise GANE's representative, Glenn Carroll, during the oral argument on standing and admissibility; however, all oral statements on those issues will be made by Ms. Carroll.

GANE also intends to continue to represent itself on all other matters, throughout any hearing that is held.

With respect to the Motion to Dismiss, GANE believes that it would be most efficient and effective for Ms. Curran to present oral argument, because the issues involved are legal matters on which she has particular expertise and experience, and because she is responsible for the legal theories in the Motion.

GANE attempted to discuss this matter with counsel for the NRC Staff and DCS regarding this request. NRC did not reply to GANE in time for the filing of this Motion and DCS responded as follows: "Counsel for DCS has stated that it has no role in GANE's selection of legal counsel, but that if GANE does intend to be represented by counsel, such counsel must enter a notice of appearance in this proceeding."

Respectfully submitted,



Glenn Carroll<sup>2</sup>  
for Georgians Against Nuclear Energy  
139 Kings Highway  
Decatur, GA 30030  
404-378-4263

Dated September 10, 2001  
in Decatur, Georgia

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<sup>1</sup> Georgians Against Nuclear Energy's Motion to Dismiss Licensing Proceeding Or, In the Alternative, Hold It In Abeyance (August 13, 2001).

<sup>2</sup> This Motion was prepared with substantial assistance from GANE's legal adviser, Diane Curran.

CERTIFICATE OF SERVICE  
by Georgians Against Nuclear Energy  
(Docket # 70-3098, ASLBP # 01-790-01-ML)

I hereby certify that copies of GANE's Motion for Leave to Enter Limited Appearance by Diane Curran were sent to the following list via e-mail with paper copies served via U.S. Postal Service First-Class Mail.

Rulemakings and Adjudications Staff  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
hearingdocket@nrc.gov

Administrative Judge Thomas S. Moore  
Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
tsm2@nrc.gov

Administrative Judge Charles N. Kelber  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
cnk@nrc.gov

Administrative Judge Peter S. Lam  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
psl@nrc.gov

John T. Hull, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
jth@nrc.gov

Donald J. Silverman, Esq.  
Morgan, Lewis & Bockius  
1800 M Street N.W.  
Washington, D.C. 20036  
dsilverman@morganlewis.com  
apolonsky@morganlewis.com

Ruth Thomas, President  
Environmentalists, Inc.  
1339 Sinkler Road  
Columbia, SC 29206

Donald J. Moniak  
Blue Ridge Environmental Defense  
League  
P.O. Box 3487  
Aiken, SC 29802  
donmoniak@earthlink.net

Edna Foster  
120 Balsam Lane  
Highlands, NC 28741  
emfoster@gte.net

Respectfully submitted,



Glenn Carroll  
for Georgians Against Nuclear Energy  
September 10, 2001 in Decatur, Georgia