

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

DOCKETED
USNRC

2002 MAR -5 AM 11: 17

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

IN THE MATTER OF)	Docket Nos. 50-390-CivP;
)	50-327-CivP; 50-328-CivP;
TENNESSEE VALLEY AUTHORITY)	50-259-CivP; 50-260-CivP;
)	50-296-CivP
)	
(Watts Bar Nuclear Plant, Unit 1;)	ASLBP No. 01-791-01-CivP
Sequoyah Nuclear Plant, Units 1 & 2;)	
Browns Ferry Nuclear Plant,)	EA 99-234
Units 1, 2, & 3))	

**TENNESSEE VALLEY AUTHORITY'S MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF MOTION FOR SUMMARY DECISION**

Pursuant to 10 C.F.R. §§ 2.730 and 2.749, the Tennessee Valley Authority (TVA) moves for leave to file a reply in support of its motion for summary decision which is filed contemporaneously herewith. The NRC Staff's response to TVA's motion for summary decision was 48 pages in length, focused on many issues and facts not pertinent to the pending motion, and overstated other facts and/or the inferences it wishes the Board to draw from such facts. We believe a short reply would be helpful to the Board in that it addresses those overstated facts and inferences that the NRC Staff raised in its response in opposition to TVA's motion for summary decision.

March 1, 2002

Office of the General Counsel
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902-1401
Facsimile 865-632-6718

Of Counsel:
David A. Repka, Esq.
Winston & Strawn
1400 L Street, NW
Washington, D.C. 20005

003692664

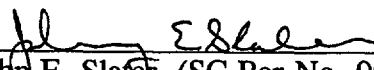
Respectfully submitted,

Maureen H. Dunn
General Counsel

Thomas F. Fine
Assistant General Counsel

Brent R. Marquand
Senior Litigation Attorney

Barbara S. Maxwell,
Attorney



John E. Slater (SC Bar No. 005149)
Senior Litigation Attorney
Telephone 865-632-7878

Attorneys for Tennessee Valley Authority

CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion for leave to file reply in support of TVA's motion for summary decision, together with the reply, has been served by regular mail on the persons listed below. Copies of the motion and reply, less the attachments which are being sent by regular mail, have also been sent by e-mail to those persons listed below with e-mail addresses.

Administrative Judge
Charles Bechhoefer, Chairman
U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852-2738
e-mail address: cxb2@nrc.gov

Administrative Judge
Richard F. Cole
U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852-2738
e-mail address: rfc1@nrc.gov

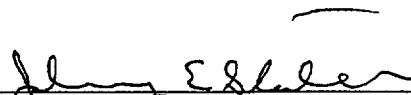
Administrative Judge
Ann Marshall Young
U.S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852-2738
e-mail address: amy@nrc.gov

Dennis C. Dambly, Esq.
Jennifer M. Euchner, Esq.
U.S. Nuclear Regulatory Commission
Office of the General Counsel
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738
e-mail address: dcd@nrc.gov
e-mail address: jme@nrc.gov

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

Mr. William D. Travers
Executive Director of Operations
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

This 1st day of March, 2002.



Attorney for Tennessee Valley Authority