



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL

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BOSTON, MASSACHUSETTS 02108-1598

THOMAS F. REILLY  
ATTORNEY GENERAL

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June 16, 2004

BY HAND

Clerk, United States Court of Appeals  
U.S. Courthouse  
1 Courthouse Way  
Boston, Massachusetts 02210

Re: Consolidated cases

Citizens Awareness Network, Inc. et al. v. United States NRC, et al., No. 041145

Public Citizen Critical Mass Energy and Environment Program, et al. v. United States, et al., No. 04-1349

Dear Sir or Madam,

Enclosed for filing in the above captioned consolidated cases, please find an Appearance Form as well as the original and four copies of a Motion of Amici Curiae for Permission to File an Oversized Addendum.

Please stamp and return one copy in the enclosed self-addressed envelope. Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nora J. Chorover".

Nora J. Chorover  
Assistant Attorney General

enclosures



cc: Steven F. Crockett, Esq.  
Shelly D. Cole, Esq.  
John F. Cordes, Jr., Esq.  
Office of General Counsel  
Mail Stop 0-15D21  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Robert Oakley, Esq.  
Environment & Nat. Resources Div.  
U.S. Department of Justice  
P.O. Box 23795  
Washington, DC 20026-3795

Jonathan M. Block, Esq.  
94 Main Street  
P.O. Box 566  
Putney, VT 05346-0566

Stephen M. Kohn, Esq.  
National Whistleblower Legal  
Defense and Education Fund  
3233 P Street, NW  
Washington, DC 20007

Ellen C. Ginsberg, Esq.  
Michael A. Bauser, Esq.  
Nuclear Energy Institute, Inc.  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

Michael T. Kirkpatrick, Esq.  
Public Citizen Litigation Group  
1600 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20009

CONSOLIDATED CASES NOS. 04-1145 and 04-1359

United States Court of Appeals  
for the First Circuit

Citizens Awareness Network, Inc., et  
al., )

Petitioners, )

and )

National Whistleblower Center and  
Committee for Safety at Plant Zion,  
Petitioner Intervenor, )

No. 04-1145

v. )

United States Nuclear Regulatory  
Commission, et al., )  
Respondents. )

Public Citizen Critical Mass Energy  
and Environment Program, et al., )  
Petitioners, )

v. )

United States, et al., )  
Respondents, )

No. 04-1359

and )

Nuclear Energy Institute, Inc., )  
Respondent Intervenor. )

MOTION OF AMICI CURIAE FOR PERMISSION TO  
FILE AN OVERSIZED ADDENDUM

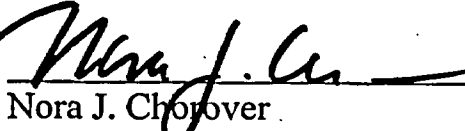
The Commonwealth of Massachusetts and the States of New Hampshire, Connecticut, New York and California hereby move for permission to file an oversized addendum that exceeds the number of pages permitted under Local Rule 28 (b).

This request is made to allow for the inclusion of reference materials that may not be otherwise readily available to the Court.

Dated: June 16, 2004

Respectively Submitted,

THOMAS F. REILLY  
ATTORNEY GENERAL

A handwritten signature in dark ink, appearing to read "Nora J. Chorover", is written over a horizontal line.

Nora J. Chorover  
Assistant Attorney General  
Environmental Protection Division  
Office of the Attorney General  
One Ashburton Place, 18th Floor  
Boston, Massachusetts 02108  
(617) 717-2200 ext. 2433

## CERTIFICATE OF SERVICE

I, Nora J. Chorover hereby certify that on June 14, 2004, I served the foregoing document by causing a copy thereof to be delivered by first-class U.S. mail, postage prepaid, to the following:

Steven F. Crockett, Esq.  
Shelly D. Cole, Esq.  
John F. Cordes, Jr., Esq.  
Office of General Counsel  
Mail Stop 0-15D21  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

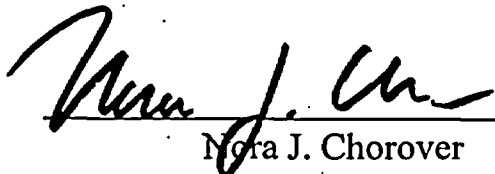
Jonathan M. Block, Esq.  
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1600 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20009

  
\_\_\_\_\_  
Nora J. Chorover

**UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT  
(617-748-9057)**

**APPLICATION FOR ADMISSION TO PRACTICE  
(Please type or print all answers)**

Name ..... Nora J. Chorover .....

Firm or Business Name ..... Office of the Attorney General .....

Firm Address ..... One Ashburton Place, 18th Floor .....

City ..... Boston ..... State ..... MA ..... Zip ..... 02108 .....

Telephone ..... 617-727-2200 x. 2433 .....

Fax ..... 617-727-9665 ..... E-mail ..... nora.chorover@ago.state.ma.us .....

Name one court before which you have been admitted to practice, and in which you are in good standing, and give the date of your admission to the court.

Name of Court ..... Massachusetts Supreme Judicial Court ..... Date of Admission ..... 12/17/85 .....

Have you ever changed your name or been known by any name other than that appearing on the application? If so, please elaborate. My professional name is and always has been

Nora J. Chorover. My married name is Nora Chorover Weingust.

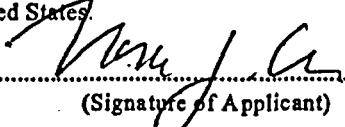
Have you ever been disbarred or suspended from practice before any court, department, bureau, or commission of the United States or of any state, or have you ever received any reprimand from any such court, department, bureau, or commission pertaining to your conduct or fitness as a member of the bar? If so, attach a separate statement. My licence in New York expired after I moved from that State in 1990. I am eligible for reinstatement.

**CERTIFICATION AND OATH**

I certify that the foregoing answers are true, and further,

I do solemnly swear (or affirm) that I will conduct myself as an attorney and counselor of this court, uprightly and according to law; and that I will support the Constitution of the United States.

6/14/04  
.....  
(Date)

  
.....  
(Signature of Applicant)

Counsel are referred to Fed.R.App.P. 12(b) and Local Rule 12