

March 27, 2006

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
ENTERGY NUCLEAR VERMONT YANKEE,	)	Docket No. 50-271-OLA
LLC and ENTERGY NUCLEAR	)	
OPERATIONS, INC.	)	ASLBP No. 04-832-02-OLA
	)	
(Vermont Yankee Nuclear Power Station)	)	

NRC STAFF'S UNOPPOSED MOTION  
FOR A TWO-DAY EXTENSION OF TIME TO FILE  
ITS ANSWER TO NEC'S BRIEF ON NEC CONTENTION 4

Pursuant to 10 C.F.R. § 2.323(a), the NRC Staff ("Staff") hereby requests a two-day extension of time in which to file its Answer to "New England Coalition's [NEC's] Brief on the Legal Scope of [NEC] Contention 4" ("NEC's Brief"), filed by NEC on March 21, 2006. In support of this request, the Staff states as follows:

1. NEC filed its Brief on March 21, 2006, setting forth its views on the legal standard at issue in NEC Contention 4,<sup>1</sup> as required by the Licensing Board in its "Order (Supplemental Schedule)" dated March 14, 2006, as modified by the Board's "Order (Granting Motion for Enlargement of Time Related to NEC Contention 4 . . . )," dated March 23, 2006.

2. In accordance with the Licensing Board's Orders, the Staff's Answer to NEC's Brief is due to be filed by March 28, 2006. The Staff is currently preparing its Answer to NEC's Brief, but due to the press of other matters, has found that it will require a limited extension of time of two days, until March 30, 2006, in which to complete and file its Answer.

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<sup>1</sup> "New England Coalition's Brief on the Legal Scope of [NEC] Contention 4," dated March 17, 2006 [sic].

3. Counsel for the Staff has spoken with Counsel for the Licensee and NEC's representative (Mr. Shadis) concerning this request. Counsel for the Licensee does not oppose the Staff's request; NEC's representative does not oppose this request, with the understanding that the date for NEC's filing of its reply to the Staff's Answer is also extended by two days, *i.e.*, until April 6, 2006.

4. The Staff submits that a grant of the instant request will not result in adverse impact to any party and will not unduly delay the conclusion of this proceeding.

Accordingly, the Staff respectfully requests a two-day extension of time, until March 30, 2006, in which to file its Answer to NEC's Brief on the legal standard at issue in NEC Contention 4.

Respectfully submitted,

**/RA/**

Sherwin E. Turk  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 27<sup>th</sup> day of March, 2006

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S UNOPPOSED MOTION FOR A TWO-DAY EXTENSION OF TIME TO FILE ITS ANSWER TO NEC'S BRIEF ON NEC CONTENTION 4," in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class; or as indicated by an asterisk (\*), by deposit in the Nuclear Regulatory Commission's internal mail system; and by e-mail as indicated by a double asterisk (\*\*), this 27<sup>th</sup> day of March, 2006.

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**/RA/**

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