



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 29, 2006

OFFICE OF THE  
GENERAL COUNSEL

Shannon Fisk  
Environmental Law and  
Policy Center  
35 E. Wacker Dr., Suite 1300  
Chicago, IL 60601

Re: *Environmental Law & Policy Center v. NRC*, No. 06-1441 (filed  
Feb. 8, 2006)

Dear Mr. Fisk,

Enclosed please find a Joint Motion for Extension of the Briefing Schedule. My declaration in support of the motion is also enclosed. After you have completed your declaration, please attach both declarations to the motion, sign on my behalf, and file the motion with the Court.

If you have any questions, please call me at (301) 415-1623. Thank you in advance for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared K. Heck", written over a horizontal line.

Jared K. Heck  
Counsel for U.S. Nuclear  
Regulatory Commission

Enclosures: As stated  
cc: service list



After consultation, Intervenor Exelon Generation Company indicated it does not support the proposed extension.

No previous extensions of time have been requested, nor has oral argument yet been scheduled. This requested extension to the briefing schedule would help the Petitioners and Respondents to better prepare their cases without unduly delaying resolution of the petition for review. Therefore, the Petitioners and Respondents respectfully request the Court extend the briefing schedule to accord with the proposed schedule provided above.

Respectfully submitted,

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SHANNON FISK  
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35 E. Wacker Dr., Suite 1300  
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Tel. (312) 795-3731

*Counsel for Petitioners*

April \_\_, 2006

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JARED K. HECK  
Attorney  
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*Counsel for Respondents*



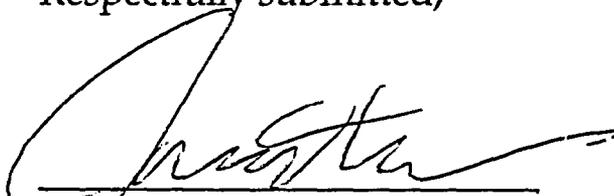
which currently requires Respondents to file a brief on May 17, 2006.

3. The Ninth Circuit is unlikely to grant further extensions to the current briefing schedule in *Farmer v. NRC*. The briefing schedule in that case has already been extended three times, and the Ninth Circuit recently denied Petitioner's request for a further stay of proceedings in that case.

4. Other attorneys in my office are occupied with other cases and projects, and are not available to take my place in either *Farmer v. NRC* or the above-captioned case.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



JARED K. HECK

Attorney

Office of the General Counsel

U.S. Nuclear Regulatory

Commission

Washington, DC 20555-0001

Tel. (301) 415-1623

*Counsel for Respondents*

March 29, 2006

CERTIFICATE OF SERVICE

I hereby certify that on April \_\_, 2006, copies of the foregoing joint motion were served by mail, postage prepaid, upon the following:

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Shannon Fisk  
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