

RAS 11821

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

DOCKETED  
USNRC

June 6, 2006 (8:00am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Docket # 50-293

In the matter of  
Entergy Corporation  
Pilgrim Nuclear Power Station  
License Renewal Application

June 5, 2006

**NOTICE OF ADOPTION OF CONTENTION BY PILGRIM WATCH**

Pilgrim Watch hereby gives notice pursuant to 10 C.F.R. § 2.309(f)(3) and 10 C.F.R. § 2.323 that it is adopting the Contention filed by the State of Massachusetts on May 26, 2006.

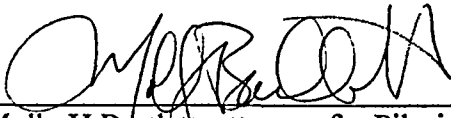
1. Pilgrim Watch filed a Request for a Hearing and Petition to Intervene in the license renewal for Pilgrim Nuclear Power Plant on May 26, 2006. In that Petition Pilgrim Watch submitted five of its own Contentions pursuant to the requirements of 10 CFR § 2.309.
2. On May 26, 2006, the Attorney General of the State of Massachusetts filed a "Request for a Hearing and Petition for Leave to Intervene with Respect to Entergy Nuclear Operations Inc.'s Application for Renewal of the Pilgrim Nuclear Power Plant Operating License and Petition for Backfit Order Requiring New Design Features to Protect Against Spent Fuel Accidents." In that Petition the State of Massachusetts raised a Contention that the Environmental Report for Renewal of the Pilgrim Nuclear Power Plant fails to satisfy NEPA because it does not address the environmental impacts of severe spent fuel pool accidents.

TEMPLATE = SECY-037

SECY-02

3. Pilgrim Watch adopts the Contention filed by the Commonwealth of Massachusetts on May 26, 2006 in this proceeding and has consulted with the Commonwealth pursuant to 10 C.F.R. § 2.309(f)(3) and through its counsel, Assistant Attorney General Matthew Brock. The Commonwealth of Massachusetts concurs in this arrangement provided that the Commonwealth shall be the representative for its Contention.
4. In addition, Pilgrim Watch adopts the Reports prepared in support of the Contention by Gordon R. Thompson entitled "Risks and Risk-Reducing Options Associated with Pool Storage of Spent Nuclear Fuel at the Pilgrim and Vermont Yankee Nuclear Power Plants" and by Jan Beyea entitled "Report To The Massachusetts Attorney General On The Potential Consequences Of A Spent-Fuel-Pool Fire At The Pilgrim Or Vermont Yankee Nuclear Plant. "
5. Pilgrim Watch has standing to adopt and pursue the Commonwealth's Contention. Indeed, the standing declaration submitted in support of Pilgrim Watch's Petition amply demonstrates standing for Pilgrim Watch's adoption of the State's Contention. Further, Pilgrim Watch has the resources and expertise to pursue this Contention in the event that a designated representative cannot.

WHEREFORE, Pilgrim Watch respectfully gives notice of and requests to adopt the Contention filed by the Commonwealth of Massachusetts.

  
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Molly H Bartlett, attorney for Pilgrim Watch

June 5, 2006

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CERTIFICATE OF SERVICE


I hereby certify that the foregoing Notice of Adoption of Contention was sent this 5<sup>th</sup> day of June, 2006 via email and U.S. Postal Service as designated to each of the following:

Secretary of the Commission (Email and 2 copies via U.S. Postal Service)  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Rulemaking and Adjudications Staff  
Email: [HEARINGDOCKET@NRC.GOV](mailto:HEARINGDOCKET@NRC.GOV)

Office of General Counsel (Email and U.S. Postal Service)  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Email: [OGCMailCenter@nrc.gov](mailto:OGCMailCenter@nrc.gov)

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Molly H Bartlett, Esq.

6/5/06

Date

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June 5, 2006

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Rulemaking and Adjudications Staff

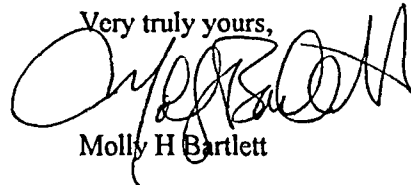
Subject: Notice of Adoption of Contention by Pilgrim Watch  
Docket # 50-293

Dear Mr. Secretary,

On behalf of Pilgrim Watch, I am enclosing the original and two copies of the Notice of Adoption of Contention by Pilgrim Watch in the above referenced proceeding.

In addition, this document is being filed electronically. Please file this document and take appropriate steps to assure that it is processed in accordance with the Code of Federal Regulations. If you have any questions or problems with regard to this Notice, please let me know immediately. I look forward to, and appreciate in advance, your confirmation of the receipt of this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Molly H. Bartlett', written over the typed name below.

Molly H Bartlett