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USNRC

June 16, 2006 (4:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**UNITED STATES OF AMERICA
BEFORE THE
NUCLEAR REGULATORY COMMISSION**

In the Matter of)	
)	
Entergy Nuclear Operations, Inc.)	Docket No. 50-293
Pilgrim Nuclear Power Station)	
)	
Regarding the Renewal of)	
Facility Operating License No.)	
DPR-35 for a 20-Year Period)	June 16, 2006

**REQUEST OF THE TOWN OF PLYMOUTH
TO PARTICIPATE AS OF RIGHT UNDER 2.315(c)**

The Town of Plymouth, Plymouth County Massachusetts (the "Town") hereby requests to participate as an "interested local governmental body," pursuant to 10 C.F.R. § 2.315(c), in any hearing granted by the Atomic Safety and Licensing Board ("Board")¹ regarding the application for the renewal of Operating License No. DPR-35 submitted by Entergy Nuclear Operations, Inc. ("Entergy") to operate the Pilgrim Nuclear Power Station ("Pilgrim").

The Town's request to participate in this matter is necessary to protect its interests in the event that a hearing in this matter is granted by the Board. A hearing may well be granted because two separate requests for hearing have been submitted to the Nuclear Regulatory Commission ("Commission") in the above-captioned docket.² A hearing concerning the

¹ See "Establishment of Atomic Safety and Licensing Board," issued June 7, 2006.

² See "Request for Hearing and Petition to Intervene by Pilgrim Watch," filed May 25, 2006; "Massachusetts Attorney General's 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 Pool Accidents," filed May 26, 2006. These petitions were filed in response to the Commission's "Notice of Acceptance for Docketing of the Application and Notice of Opportunity for Hearing Regarding Renewal of Facility Operating

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TEMPLATE = SECY-037

SECY-02

issuance of a renewed license to Entergy will necessarily raise issues that are of mutual concern to the Commission and the Town. Accordingly, the Town seeks to participate in this matter, but may not take a position on all of the issues before the Commission.

The Town, on behalf of its residents, has an interest in participating in any hearing on Entergy's application for a renewed license to operate the Pilgrim plant. The Pilgrim plant is located within the Town of Plymouth, Massachusetts. Entergy is seeking Commission approval to extend the current operating license for the Pilgrim plant, which will expire on June 8, 2012, for an additional twenty years. The Town, through its representatives, is responsible for ensuring the protection of the citizens of the Town and of residents of nearby communities from any activities or events at Pilgrim that could otherwise endanger their health, lives, and property. The Town plays an integral role in carrying out emergency plans with respect to Pilgrim. Similarly, the Town is charged with protecting the environment in and around the Town from potential harm and ensuring that all businesses located within the Town comply with local regulations governing business operations and practices. Thus, the safe operation of the Pilgrim plant during a renewed license is of particular concern to the Town.

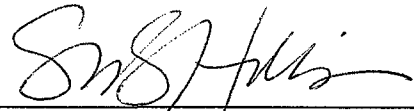
The Town, therefore, is an "interested local governmental body" that should be accorded an opportunity to participate pursuant to 10 C.F.R. § 2.315(c) in any hearing that is granted in this matter. The Town's participation is appropriate and necessary to ensure that the health, safety, defense, security, and environmental concerns of the Town are appropriately considered and addressed.

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License No. DPR-35 for an Additional 20-Year Period." (71 Fed. Reg. 15,222 (March 27, 2006)).

The Town's representative in any hearing held on this matter shall be Sheila S. Hollis, Partner, Duane Morris, LLP. As the Town representative during the hearing, Ms. Hollis shall have all rights provided under 10 C.F.R. § 2.315(c). In accordance with that section, the Town intends to identify those contentions on which it will participate in advance of any hearing held.

Respectfully submitted,



Sheila S. Hollis, Esq.
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Attorneys for Town of Plymouth

Pursuant to 10 C.F.R. § 2.304(e), the following are designated as the persons on whom service of the pleadings and other papers in this proceeding should be made:

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document have been served upon the following persons or entities by electronic mail and by U.S. mail, first class, postage pre-paid.

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Dated at Washington, D.C., this 16th day of June, 2006.



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