

RAS 11745

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

DOCKETED  
USNRC

June 16, 2006 (3:41pm)

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In the Matter of )  
 )  
Entergy Nuclear Operations, Inc. )  
 )  
(Pilgrim Nuclear Power Station) )  
\_\_\_\_\_ )

Docket No. 50-293-LR

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO REPLY TO NRC STAFF RESPONSE TO HEARING REQUEST**

Pursuant to the Atomic Safety and Licensing Board's ("ASLB's") Order of June 14, 2006, and 10 C.F.R. § 2.323(b), the Massachusetts Attorney General hereby moves for a two-day extension of time to reply to the U.S. Nuclear Regulatory Commission ("NRC") Staff's response to the Attorney General's hearing request and contention.<sup>1</sup> The NRC Staff has agreed to this motion on the condition that the Staff should be allowed a corresponding extension of two days, or until June 22, 2006, to file its response. The Attorney General does not oppose the Staff's request.

**DISCUSSION**

On May 26, 2006, the Attorney General served its Hearing Request and Contention on the NRC Staff by hand, and on Entergy Nuclear Operations, Inc. ("Entergy") by overnight mail. Under the NRC's procedural rules, the Staff's response is due on June 20, and Entergy's response is due on June 22. Therefore the Attorney General's reply to the Staff is due on June 27, while his reply to Entergy's response is due on June 29.

<sup>1</sup> Massachusetts Attorney General's Request for a Hearing and Petition to Intervene With Respect to Entergy Nuclear Operations Inc.'s Application for Renewal of

In anticipation that some of the arguments by Entergy and the Staff may overlap, the Attorney General wishes to be able to address them in a single reply pleading. Therefore, the Attorney General seeks to adjust the briefing schedule slightly so that the due date for its reply to the Staff and Entergy will fall on the same date, June 29.

Undersigned counsel Diane Curran consulted Susan Uttal, counsel for the Staff, and David Lewis, counsel for Entergy, who had no objection to this motion. As discussed above, however, the Staff seeks an extension of time until June 22 for its response. The Attorney General has no objection to giving the NRC Staff an additional two days for its response.

Respectfully submitted,



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June 16, 2006

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the Pilgrim Nuclear Plant Operating License, etc. (May 26, 2006) (“Hearing Request and Contention”).

## CERTIFICATE OF SERVICE

I certify that on June 16, 2006, copies of the foregoing letter from Diane Curran to Administrative Judges and Massachusetts Attorney General's Motion for Extension of Time to File Reply were served on the following by first-class mail and/or electronic mail, as indicated below:

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