

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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Nuclear Information and Resource Service and  
Public Citizen,  
Petitioners,

-against-

Petition for Review No. 06-1301

U.S. Nuclear Regulatory Commission and  
the United States of America,  
Respondents.

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Nuclear Information and Resource Service and  
Public Citizen,  
Petitioners,

-against-

Petition for Review No. 06-1310

U.S. Nuclear Regulatory Commission and  
the United States of America,  
Respondents.

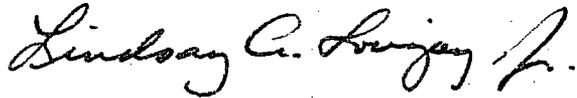
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**MOTION ON BEHALF OF  
NUCLEAR INFORMATION AND RESOURCE SERVICE AND PUBLIC CITIZEN  
FOR CONSOLIDATION**

Petitioners Nuclear Information and Resource Service and Public Citizen (collectively, "NIRS/PC") hereby move the Court for consolidation of the two above-styled pending petitions for review, Nos. 06-1301 and 06-1310. The two cases involve the same licensing proceeding before the Nuclear Regulatory Commission (the "Commission"), in which proceeding the Applicant was Louisiana Energy Services, L.P. ("LES"). Therefore, the same issues are likely to predominate in both cases.

Counsel for NIRS/PC have consulted with counsel for the Commission and for LES and  
can report that they do not oppose consolidation.

Respectfully submitted,



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September 21, 2006

## CERTIFICATE OF SERVICE

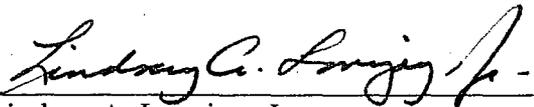
Pursuant to Rule 15 of the Federal Rules of Appellate Procedure, the undersigned attorney of record certifies that on September 21, 2006, the foregoing Motion on behalf of NIRS/PC to Consolidate was served by first class mail upon the following:

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