

October 12, 2006

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
DAVID GEISEN

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Docket No. IA-05-052

ASLBP No. 06-845-01-EA

JOINT MOTION FOR EXTENSION OF TIME

The parties to this proceeding filed written discovery responses on October 3, 2006, upon mutual agreement when computer problems prevented the Staff from filing on the original due date of October 2, 2006. Upon initial review of the responses filed on behalf of Mr. Geisen, the Staff determined that it may file a motion to compel and, additionally, may renew its motion to stay the proceeding. Because it anticipated that the motion for stay would likely require more than ten pages, the Staff filed a "NRC Staff Request to Exceed Page Limits" on October 10, 2006. At the time of the filing, Staff counsel had been unable to contact counsel for Mr. Geisen regarding the request.

Since that time, counsel have been able to confer and have agreed to consult further in order to attempt to resolve discovery issues, including issues that Mr. Geisen may have relating to the discovery responses served by NRC Staff. In order to allow time for this process, counsel have mutually agreed to request an extension of time until Friday, October 20, 2006,

for the filing of any motions by the parties based on their respective written discovery responses dated October 3, 2006. Accordingly, the parties respectfully request that this extension be granted by the Board.

Respectfully submitted,

/RA by Lisa Clark/

Lisa Clark
Michael Spencer
Counsel for NRC Staff

/RA for Charles McAleer, Jr. by Lisa Clark/

Richard Hibey
Charles F. B. McAleer, Jr.
Andrew T. Wise
Matthew T. Reinhard
Counsel for David Geisen

Dated at Rockville, Maryland
this 12th day of October, 2006

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CERTIFICATE OF SERVICE

I hereby certify that copies of "JOINT MOTION FOR EXTENSION OF TIME" in the above captioned proceeding have been served on the following persons by deposit in the United States Mail; through deposit in the Nuclear Regulatory Commission internal mail system as indicated by an asterisk (*); and by electronic mail as indicated by a double asterisk (**) on this 12th day of October, 2006.

Michael C. Farrar * **
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop: T-3 F23
Washington, D.C. 20555
E-mail: mcf@nrc.gov

E. Roy Hawken * **
Chief Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop: T-3 F23
Washington, D.C. 20555
E-mail: erh@nrc.gov

Nicholas G. Trikourous * **
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop: T-3 F23
Washington, D.C. 20555
E-mail: ngt@nrc.gov

Office of Commission Appellate Adjudication *
U.S. Nuclear Regulatory Commission
Mail Stop: O-16 C1
Washington, D.C. 20555

Adjudicatory File *
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop: T-3 F23
Washington, D.C. 20555

Richard A. Hibey, Esq. **
Charles F.B. McAleer, Jr., Esq.
Andrew T. Wise, Esq.
Mathew T. Reinhard, Esq.
Miller & Chevalier
655 Fifteenth Street, N.W., Suite 900
Washington, D.C. 20005-5701
E-Mail: rhibey@milchev.com
awise@milchev.com
mreinhard@milchev.com

Office of the Secretary * **
Attn: Rulemaking and Adjudications Staff
U.S. Nuclear Regulatory Commission
Mail Stop: O-16 C1
Washington, D.C. 20555
E-Mail: hearingdocket@nrc.gov

Margaret Parish * **
Board Law Clerk
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Mail Stop: T-3 F23
Washington, D.C. 20555
E-Mail: map4@nrc.gov

Libby Perch * **
Board Staff
Atomic Safety and Licensing Board Panel
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: emp1@nrc.gov

/RA/

Lisa B. Clark
Counsel for NRC Staff