

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF THE SECRETARY

ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

April 4, 2007 (2:35pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Before Administrative Judges:

E. Roy Hawkens, Chair

Dr. Paul B. Abramson

Dr. Anthony J. Baratta

\_\_\_\_\_  
In the Matter of )

AMERGEN ENERGY COMPANY, LLC )

(License Renewal for the Oyster Creek  
Nuclear Generating Station) )

) April 4, 2007

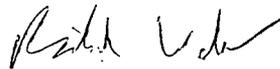
) Docket No. 50-0219-LR

**CITIZENS' UNCONTESTED MOTION FOR AN EXTENSION AND PERMISSION  
TO FILE AN OVERLENGTH ANSWER**

Nuclear Information and Resource Service, Jersey Shore Nuclear Watch, Inc., Grandmothers, Mothers and More for Energy Safety, New Jersey Public Interest Research Group, New Jersey Sierra Club, and New Jersey Environmental Federation (collectively "Citizens") move to extend the deadline for them to answer the motion for summary disposition filed by American Energy Company LLC ("AmerGen") by 7 days to April 26, 2007 to allow them to prepare a full response. Citizens counsel has had longstanding vacation plans to leave the country from April 12 to 21, 2007. At present, responses to the Motion for Summary Disposition are due on April 19, 2007. Thus, without the extension, Citizens would be deprived of seven of the twenty days allowed for them to answer AmerGen.

AmerGen has consented to this extension and NRC Staff have consented, provided the staff deadline to answer is similarly extended. Finally, Citizens also request permission to file an answer that is longer than ten pages. Citizens expect that it will take twenty to thirty pages to respond fully to the motion for summary disposition, which is thirty one pages long. Once again, AmerGen and NRC Staff consent. NRC Staff's consent to this request is contingent on Staff being afforded permission to file an answer of similar length.

Respectfully submitted



---

Richard Webster, Esq  
RUTGERS ENVIRONMENTAL LAW CLINIC  
Attorneys for Citizens

Dated: April 4, 2007

UNITED STATES OF AMERICA  
BEFORE THE NUCLEAR REGULATORY COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	Docket No. 50-0219-LR
AMERGEN ENERGY COMPANY, LLC	)	
	)	ASLB No. 06-844-01-LR
(License Renewal for the Oyster Creek	)	
Nuclear Generating Station)	)	April 4, 2007
	)	

CERTIFICATE OF SERVICE

I, Richard Webster, of full age, certify as follows:

1. I represent Citizens in this proceeding.
2. I hereby certify that on April 4, 2007 I caused a motion for a deadline extension and permission to file an overlength answer to be served via email and U.S. Postal Service on the following:

Secretary of the Commission (Email and original 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)

Administrative Judge  
E. Roy Hawken, Chair (Email and U.S. Postal Service)  
Atomic Safety and Licensing Board Panel  
Mail Stop – T-3 F23  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Email: [erh@nrc.gov](mailto:erh@nrc.gov)

Administrative Judge  
Dr. Paul B. Abramson (Email and U.S. Postal Service)  
Atomic Safety and Licensing Board Panel  
Mail Stop – T-3 F23  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Email: [pba@nrc.gov](mailto:pba@nrc.gov)

Administrative Judge  
Dr. Anthony J. Baratta (Email and U.S. Postal Service)  
Atomic Safety and Licensing Board Panel  
Mail Stop – T-3 F23  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Email: [ajb5@nrc.gov](mailto:ajb5@nrc.gov)

Law Clerk  
Debra Wolf (Email and U.S. Postal Service)  
Atomic Safety & Licensing Board Panel  
Mail Stop – T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
[DAW1@nrc.gov](mailto:DAW1@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)

Mitzi Young (Email and U.S. Postal Service)  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop: O-15 D21  
Washington, DC 20555-0001  
E-mail: [may@nrc.gov](mailto:may@nrc.gov)

Mary C. Batty (Email and U.S. Postal Service)  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop: O-15 D21  
Washington, DC 20555-0001  
E-mail: [mcb1@nrc.gov](mailto:mcb1@nrc.gov)

Alex S. Polonsky, Esq. (Email and U.S. Postal Service)  
Morgan, Lewis, & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Email: [apolonsky@morganlewis.com](mailto:apolonsky@morganlewis.com)

Kathryn M. Sutton, Esq. (Email and U.S. Postal Service)  
Morgan, Lewis, & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Email: [ksutton@morganlewis.com](mailto:ksutton@morganlewis.com)

Donald Silverman, Esq. (Email and U.S. Postal Service)  
Morgan, Lewis, & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Email: [dsilverman@morganlewis.com](mailto:dsilverman@morganlewis.com)

J. Bradley Fewell (Email and U.S. Postal Service)  
Exelon Corporation  
200 Exelon Way, Suite 200  
Kennett Square, PA 19348  
[bradley.fewell@exeloncorp.com](mailto:bradley.fewell@exeloncorp.com)

John Covino, DAG (Email and U.S. Postal Service)  
State of New Jersey  
Department of Law and Public Safety  
Office of the Attorney General  
Hughes Justice Complex  
25 West Market Street  
P.O. Box 093  
Trenton, NJ 08625  
E-mail: [john.corvino@dol.lps.state.nj.us](mailto:john.corvino@dol.lps.state.nj.us)

Valerie Gray (Email and U.S. Postal Service)  
State of New Jersey  
Department of Law and Public Safety  
Office of the Attorney General  
Hughes Justice Complex  
25 West Market Street  
P.O. Box 093  
Trenton, NJ 08625  
E-mail: [valerie.gray@dol.lps.state.nj.us](mailto:valerie.gray@dol.lps.state.nj.us)

Paul Gunter (Email and U.S. Postal Service)  
Nuclear Information and Resource Service  
6930 Carroll Ave., Suite 340  
Takoma Park, MD 20912-4446  
Email: [pgunter@nirs.org](mailto:pgunter@nirs.org)

Edith Gbur (Email)  
Jersey Shore Nuclear Watch, Inc.  
364 Costa Mesa Drive. Toms River, New Jersey 08757  
Email: [gburl@comcast.net](mailto:gburl@comcast.net)

Paula Gotsch (Email)  
GRAMMIES  
205 6<sup>th</sup> Avenue  
Normandy Beach, New Jersey 08723

paulagotsch@verizon.net

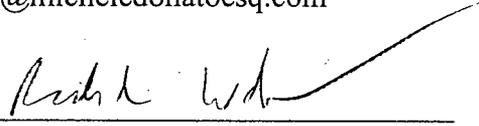
Jeff Tittel (Email)  
New Jersey Sierra Club  
139 West Hanover Street  
Trenton New Jersey 08618  
Email: [Jeff.Tittel@sierraclub.org](mailto:Jeff.Tittel@sierraclub.org)

Adam Garber (Email)  
New Jersey Public Interest Research Group  
11 N. Willow St,  
Trenton, NJ 08608.  
Email: [agarber@njpirg.org](mailto:agarber@njpirg.org)

Peggy Sturmfels (Email)  
New Jersey Environmental Federation  
1002 Ocean Avenue  
Belmar, New Jersey 07319  
Email: [psturmfels@cleanwater.org](mailto:psturmfels@cleanwater.org)

Michele Donato, Esq. (Email)  
PO Box 145  
Lavalette, NJ 08735  
Email: [mdonato@micheledonatoesq.com](mailto:mdonato@micheledonatoesq.com)

Signed:

  
Richard Webster

Dated: April 4, 2007