

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

DOCKETED
USNRC

June 19, 2007 (4:15pm)

ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Before Administrative Judges:

Michael C. Farrar, Chairman

Nicholas G. Trikouros

Dr. William M. Murray

In the Matter of)

Shaw Areva MOX Services)

(Mixed Oxide Fuel Fabrication Facility
Possession and Use License))

Docket No. 70-3098-MLA

ASLBP No. 07-856-02-MLA-BD01

June 19, 2007

**JOINT REQUEST FOR 5-DAY EXTENSION FOR FILING CONSOLIDATED
REPLY ON MOX LICENSE APPLICATION**

Nuclear Watch South, Blue Ridge Environmental Defense League (BREDL) and Nuclear Information & Resource Service ("the petitioners") respectfully file this joint request for a 5-day extension of the deadline for filing a consolidated reply to the NRC Staff and Shaw Areva MOX Services in the matter of the request by Shaw Areva MOX Services for a license to possess and use plutonium in a plutonium fuel factory at Savannah River Site. Specifically, the petitioners request that the deadline be extended from June 20, 2007 until June 27, 2007. The NRC Staff does not object to this request (phone conversation with Margaret J. Bupp, 6/19/07). Shaw Areva MOX Services refused to support the request for extension (phone conversation with Donald J. Silverman, 6/19/07).

BREDL has several prior commitments which render its representatives unavailable to this process until June 25, 2007.

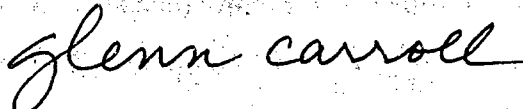
Lou Zeller who is representing BREDL has been in attendance at regional and community meetings in Virginia from June 13, 2007 (the date Shaw Areva MOX Services filed its reply brief) through June 18, 2007. The Virginia meetings involved several groups and were booked two months prior. Mr. Zeller is unavailable today because of regularly scheduled commitments for air sample field testing and tomorrow because BREDL is releasing a major health study in Georgia (June 20, 2007). The release

is a long-planned collaborative event involving several organizations; further, BREDL is the lead organization. Other unavoidable commitments tie up BREDL's calendar for the rest of this week.

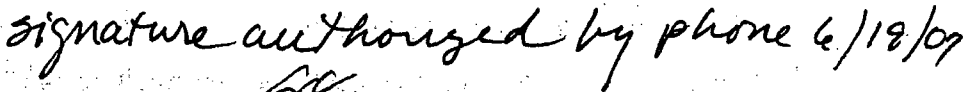
Additionally, Nuclear Watch South's representative Glenn Carroll's grandson will be born on or before June 23, 2007. This pending blessed event creates uncertainties that make it impractical for the parties to coordinate a consolidated reply earlier than June 27, 2007.

Considering the length of the NRC's and Shaw Areva MOX Services' replies and the importance of the issues at stake, we respectfully request a 5-day extension of time to make our reply. We hope that you agree that the petitioners' prior commitments and family events present unavoidable and extreme circumstances which profoundly hamper the petitioners' ability to meet the deadline of June 20, 2007 and will grant this request for extension to June 27, 2007.

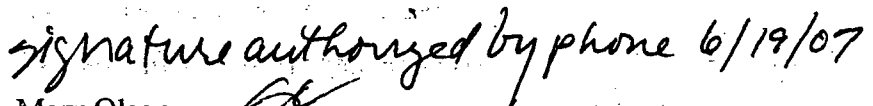
Respectfully submitted,



Glenn Carroll
Nuclear Watch South,



Louis A. Zeller
Blue Ridge Environmental Defense League



Mary Olson
Nuclear Information & Resource Service

Dated June 19, 2007
in Decatur, Georgia

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CERTIFICATE OF SERVICE

I hereby certify that copies of Nuclear Watch South, Blue Ridge Environmental Defense League and Nuclear Information & Resource Service's "Joint Request for 5-Day Extension for Filing Consolidated Reply on MOX License Application" was e-mailed to the following with hard copies served by First Class U.S. Mail.

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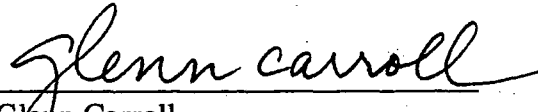
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Respectfully submitted,


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June 19, 2007 in Decatur, Georgia