

RAS 14899

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January 7, 2008 [8:30am]

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF THE SECRETARY

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE COMMISSION

_____)	
In the Matter of)	
)	Docket No. 50-0219-LR
AMERGEN ENERGY COMPANY, LLC)	
)	
(License Renewal for the Oyster Creek)	January 4, 2008
Nuclear Generating Station))	
_____)	

**CITIZENS' EMERGENCY MOTION FOR ADDITIONAL PAGES TO
APPEAL THE BOARD'S FINAL DECISION**

This motion is filed on behalf of 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"). On December 18, 2007, the clerk to the Atomic Safety and Licensing Board (the "Board") e-mailed the decision of the Board rejecting Citizens' contention. LBP-07-17. Citizens intend to appeal this decision, but are finding that the 25 page limit specified by 10 C.F.R. § 2.341(b)(2) is extremely tight for a filing that petitions for review of all the issues raised in the proceeding in over two years of litigation. Without additional pages, Citizens will be unable to fully brief all of the issues raised. Citizens therefore request that the Commission grant them an additional 15 pages.¹

¹ Citizens have consulted with opposing counsel on this issue. Both AmerGen and the NRC Staff oppose this motion.

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CONCLUSION

For the foregoing reasons, the Commission should grant Citizens the ability to file a 40 page petition for review.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard Webster", with a long, sweeping horizontal line extending to the right.

Richard Webster, Esq
Eastern Environmental Law Center
Attorneys for Citizens

Dated: January 4, 2008

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

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))	January 4, 2008
)	

CERTIFICATE OF SERVICE

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

I hereby certify that on January 4, 2008, I caused Citizens' Emergency Motion For
Additional Page to be served via email and U.S. Postal Service (as indicated) 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
E-mail: HEARINGDOCKET@NRC.GOV

Office of Commission Appellate Adjudication
United States Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemaking and Adjudications Staff
Email: OCAAMail@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
E-mail: 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
E-mail: 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
E-mail: ajb5@nrc.gov

Law Clerk
Emily Krause (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
E-mail: DAW1@nrc.gov

Office of General Counsel (Email and U.S. Postal Service)
United States Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: OGCMAILCENTER@NRC.GOV

James E. Adler (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: jeal@nrc.gov

Mary C. Baty (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

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

Kathryn M. Sutton, Esq. (Email and U.S. Postal Service)
Morgan, Lewis, & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004

E-mail: ksutton@morganlewis.com

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

J. Bradley Fewell (Email and U.S. Postal Service)
Exelon Corporation
200 Exelon Way, Suite 200
Kennett Square, PA 19348
E-mail: bradley.fewell@exceloncorp.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

Valerie Gray (Email)
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

Paul Gunter (Email and U.S. Postal Service)
c/o Nuclear Information and Resource Service
6930 Carroll Ave., Suite 340
Takoma Park, MD 20912-4446
E-mail: paul@beyondnuclear.org

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


Paula Gotsch (Email)
GRAMMIES
205 6th Avenue

Normandy Beach, New Jersey 08723
E-mail: paulagotsch@verizon.net

Jeff Tittel (Email)
New Jersey Sierra Club
139 West Hanover Street
Trenton New Jersey 08618
E-mail: Jeff.Tittel@sierraclub.org

Peggy Sturfels (Email)
New Jersey Environmental Federation
1002 Ocean Avenue
Belmar, New Jersey 07319
E-mail: psturfels@cleanwater.org

Michele Donato, Esq. (Email)
PO Box 145
Lavalette, NJ 08735
E-mail: mdonato@micheledonatoesq.com

Signed: 
Richard Webster

Dated: January 4, 2008