December 15, 2008 (10:53am)

OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

New England Coalition

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December 15, 2008

Office of the Secretary
Attn: Rulemaking and Adjudications Staff
Mail Stop: O-16C1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket No. 50-271-LR, ASLBP No. 06-849-03-LR, Vermont Yankee Nuclear Power Station

Dear Rulemaking and Adjudications Staff,

Please find enclosed for filing before the Atomic Safety and Licensing Board in the above captioned proceeding:

NEW ENGLAND COALITION, INC.'S MOTION FOR A SECOND EXTENSION OF TIME IN WHICH TO FILE A MOTION FOR RECONSIDERATION

Thank you for your kind attention,

for New England Coalition, Inc.

Raymond Shadis Pro Se Representative Post Office Box 98 Edgecomb, Maine 04556

Inplate Secy-041

UNITED STATES NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of

Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc.

(Vermont Yankee Nuclear Power Station)

December 15, 2008

Docket No. 50-271-LR ASLB No. 06-894-03-LR

NEW ENGLAND COALITION, INC.'S MOTION FOR A SECOND EXTENSION OF TIME IN WHICH TO FILE A MOTION FOR RECONSIDERATION

New England Coalition, Inc. (NEC) respectfully requests a second extension of the deadline for a motion for reconsideration of the Atomic Safety and Licensing Board's ("ASLB") ("Board") Partial Initial Decision (Ruling on Contentions 2A, 2B, 3, and 4) in the above captioned matter.

The current deadline for NEC's Motion for Reconsideration, per the ASLB Order issued on December 4, 2008; granting a ten day extension of time, is December 15, 2008.

NEC requests that the Board extend the deadline by two days or until Wednesday, December 17, 2008.

NEC recognizes the extraordinary nature of a second extension of time however, as discussed below; NEC has experienced extraordinary, unforeseen, and unavoidable obstruction and delay in preparing its Motion for Reconsideration filing.

Discussion

A Second Extension of Time (until Wednesday, December 17th) in which to file NEC's Motion for Reconsideration is necessary to restore working time lost due to the New England-wide ice storm of December 11th and 12th. This very severe storm knocked

out power to over 300,000 Central Maine Power customers: among them, NEC's Pro Se Representative. As a result of time lost due to the storm NEC now lacks adequate time in which to finalize its Motion for Reconsideration.

The ice storm knocked out power and phone (including internet connection) to the office and home of NEC's Pro Se Representative from Thursday evening (the 11th) until Saturday afternoon (the 13th). Roads in the vicinity were impassable due to ice and downed power lines until mid-day Friday at which point NEC relocated preparation of its Motion for Reconsideration into borrowed office space in a nearby town. However, work in the borrowed space was greatly hampered as NEC's Pro Se Representative had only intermittent phone service and internet access; and did not have access to files in the main office computer or the office library. As it is, NEC is working diligently to complete the Motion for Reconsideration but it is very doubtful that it can be ready by the end of the day, December 15, 2008.

No party will be unduly burdened by a small extension of time of two days at this juncture. The proposed extension will however restore to New England Coalition time lost due to the ice storm; time much needed to finalize the Coalition's filing.

Agreement of the Parties

On the morning of December 15, 2008, NEC requested (via E-mail) agreement of the Parties to its motion.

As of the time of this (electronic) filing Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Entergy), and the States of New Hampshire and Massachusetts have not responded.

The State of Vermont Department of Public Service has indicated that it will support the motion.

NRC Staff has indicated that it will not oppose the motion provided that two additional days in which to respond are also granted.

Motion

For all of the good reasons stated above, NEC respectfully moves the Board to extend the deadline for filing NEC's Motion to Reconsider by two days, until December 17, 2008.

Raymond Shadis

Pro se Representative

New England Coalition

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Edgecomb, Maine 04556

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AFFIDAVIT

I, Raymond Shadis, swear under penalty of perjury that description of circumstances in the forgoing Motion for a Second Extension of Time in Which to File a Motion for Reconsideration is accurate and true.

Raymond Shadis

Pro se Representative

New England Coalition

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Edgecomb, Maine 04556

207-882-7801

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
•)	
Entergy Nuclear Vermont Yankee, LLC)	Docket No. 50-271-LR
and Entergy Nuclear Operations, Inc.)	ASLBP No. 06-849-03-LR
)	
(Vermont Yankee Nuclear Power Station)	Ć	

CERTIFICATE OF SERVICE

I, Raymond Shadis, hereby certify that copies of New England Coalition, Inc.'s Motion for a Second Extension of Time in Which to File a Motion For Reconsideration in the above-captioned proceeding were served on the persons listed below, by U.S. Mail, first class, postage prepaid; and, where indicated by an e-mail address below, by electronic mail, on the 15th of December, 2008.

Administrative Judge Alex S. Karlin, Esq., Chair Atomic Safety and Licensing Board Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail: ask2@nrc.gov

Administrative Judge William H. Reed 1819 Edgewood Lane Charlottesville, VA 22902 E-mail: whreville@embarqmail.com

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