

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

**In the Matter of
South Texas Project Nuclear Operating Co.
Application for the South Texas Project
Units 3 and 4
Combined Operating License**

Docket Nos. 52-012, 52-013

**INTERVENORS' MOTION FOR ADDITIONAL TIME TO FILE NEW CONTENTIONS
RELATED TO APPLICANT'S SUBMITTALS CONCERNING CONTENTIONS 8, 9 & 14**

Pursuant to 10 C.F.R. 2.307(a) the Intervenor respectfully move this ASLB for an Order extending the time to December 23, 2009 for the Intervenor to file new contentions that are related to the Applicant's Proposed Revisions to the Environmental Report that concern Contentions 8,9, and 14.

Presently, any new contentions related to the aforementioned revisions are due on December 14, 2009.

Counsel for the Applicant and Staff have been consulted and do not oppose this motion as long as they are allowed until January 25, 2010 to file their respective Answers; Intervenor do not oppose the proposed Answer date.

Intervenor require additional time to adequately develop the proposed new contentions. The Applicant's submittals concerning Contentions 8,19, and 14 raise a number of factual issues that require additional time to consider. Additionally, any new contentions related to Contentions 8, 9, and 14 would likely be informed by the Board's ruling on the Applicant's pending Motion to Dismiss Contentions 8, 9, and 14 as Moot. Further, the Intervenor seek additional time to file the new contentions in order to allow undersigned counsel to deal with other matters unrelated to this docket that are pending and require

counsel's attention. The unrelated matters were pending prior to the filing of the subject submittal by the Applicant.

This motion is not made to unduly delay the proceedings herein.

Respectfully submitted,

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December 10, 2009

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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2009 a copy of “Intervenors’ Motion for Additional Time to File New Contentions Related to Applicant’s Submittals Concerning Contentions 8, 9 & 14” was served by the Electronic Information Exchange on the following recipients:

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