

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE SECRETARY

In the Matter of  
FPL Energy Seabrook, LLC (NextEra, Inc)  
(Seabrook Station, Unit 1 – License Renewal Application)

October 22, 2010  
Docket No. 50-443

**FRIENDS OF THE COAST/NEW ENGLAND COALITION'S**  
**REQUEST FOR EXTENSION OF TIME**

INTRODUCTION

Friends of the Coast/New England Coalition, (Friends of the Coast/NEC) through its pro se representative, Raymond Shadis, respectfully requests a one-day extension of time in which to file its Petition for Leave to Intervene and Request for a Hearing in the above captioned matter.

This extension, if granted, would allow for filing of Friends of the Coast/NEC's Petition and Request on October 21, 2010, one day past the due date of October 20, 2010.

DISCUSSION

Friends of the Coast/NEC's need for the requested extension arises from the unforeseen and inadvertent frustration of good faith efforts of Friends of the Coast/NEC to timely file the Petition and Request using NRC's Adjudicatory Submission System on the evening of October 20, 2010.

Shortly after 10 o'clock on the evening of October 20th, Friends of the Coast/NEC entered the Adjudicatory Submission System using its digital certificate and uploaded its pleading in thirteen files, proceeding through the four-part process to the

final Sign and Submit section, requiring digital signature.

However, despite efforts to comply with instructions at this section, the signature simply would not register. Repeated efforts were met with error messages including the one copied from the Friends of the Coast/NEC computer screen that evening and attached hereto; and then 'timed-out' messages.

Having been dropped from the submissions site and fearing that something might be lacking or entered incorrectly in the initial submissions sections, Friends of the Coast/NEC then painstakingly began at the beginning, uploading all thirteen files and proceeding through to the signature section, only to be again thwarted in repeated attempts with variations to sign and submit the filing.

At just a few minutes before midnight, Friends of the Coast/NEC moved expeditiously to prepare and provide an e-mail service of the filing to the Commission and to the parties.

On the morning of October 21, 2010, NRC's electronic filing system contractor contacted Friends of the Coast/NEC and managed, working with Friends of the Coast/NEC, to find and resolve the problem permitting successful submission after two complete uploads and system walkthroughs and more than an hour and a half of collaborative effort.

## CONCLUSION

It is clear that Friends of the Coast/NEC made every effort to timely file and that that effort was frustrated through no fault of its own. Further, Friends of the Coast/NEC moved promptly to remedy the defect by providing the Commission and the parties copies of its filing by alternate means; as soon as possible.

The requested order extending time would at this point have the effect of granting NRC acceptance of Friends of the Coast/NEC's Petition for Leave to Intervene and Request for a Hearing, electronically submitted on the morning of October 21, 2010, as timely filed.

There is no substantial harm to the parties with respect to timeliness, inasmuch as service was provided, albeit via e-mail, within minutes of the deadline and electronic submission to the docket and service list was completed in the forenoon of the next day.

Members and constituents of Friends of the Coast/NEC, who live in the tri-state region surrounding Seabrook Station and who have very valid and strongly-held concerns regarding the renewal of the Seabrook Station license, would greatly benefit because the requested extension of time would ensure them access to hearing rights accorded them by the Atomic Energy Act and embodied in NRC regulation.

For all of the good reasons set forth above, Friends of the Coast/NEC now respectfully requests that the Secretary of the Commission now grant the requested extension of time for Friends of the Coast/NEC to file its Motion for Leave to Intervene and Request for extension of Time in the above captioned matter of one day.

Pro se representative for Friends of the Coast/NEC certifies that he has consulted with the other parties as required by 10 C.F.R. § 2.323(b). NRC Staff does not oppose this motion. FPL/NextEra takes no position on the motion, but wishes to reserve the right to file an answer after reviewing its contents.

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Attachment: NRC Site Error Message – 10/20/2010

**Webform Server Translator Error**

An error has occurred in the Webform Server translator module. Please consult your system administrator and mention the following details:

Exception=HTTP Action (pagedone) used incorrect method (GET)!  
Timestamp=1287635882027

We apologize for any inconvenience this error may have caused.