

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE CHIEF ADMINISTRATIVE JUDGE OF THE ATOMIC SAFETY AND
LICENSING BOARD PANEL

In the Matter of)
)
Exelon Nuclear Texas Holdings, LLC) Docket No. 52-042
)
(Early Site Permit for Victoria County)
Station Site))

JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER

In accordance with the U.S. Nuclear Regulatory Commission (“NRC”) Order imposing procedures for access to Sensitive Unclassified Non-Safeguards Information, published in the *Federal Register* on November 23, 2010 (75 Fed. Reg. 71467, 71470), Exelon Nuclear Texas Holdings, LLC (applicant in the above-captioned matter), Texans for a Sound Energy Policy (a petitioner in this proceeding), and the NRC Staff, hereby jointly request that the Atomic Safety and Licensing Board approve the attached agreed-upon Protective Order. The Protective Order governs access to and use of Part 6 of the Early Site Permit (ESP) Application from Exelon Nuclear Texas Holdings, LLC.

The proposed Protective Order, which includes a Non-Disclosure Affidavit to be executed by a representative of Texans for a Sound Energy Policy, and their designated legal counsel, Mr. Charles W. Irvine, is attached to this Joint Motion. Counsel for the Applicant and for Texans for a Sound Energy Policy have authorized the NRC Staff to file this joint motion on their behalf.

Respectfully submitted,
/Signed (electronically) by/
Stephanie N. Liaw
Counsel for NRC staff
U.S. Nuclear Regulatory Commission
Mail Stop O-15 D21
Washington, DC 20555-0001
(301) 415-2472
Stephanie.Liaw@nrc.gov

Dated in Rockville, MD
this 17th day of December, 2010

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NOTICE OF APPEARANCE FOR STEPHANIE N. LIAW

Notice is hereby given that the undersigned attorney herewith enters an appearance in the above-captioned matter. In accordance with 10 C.F.R. § 2.314(b), the following information is provided:

Name: Stephanie N. Liaw
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Admissions: Maryland
Name of Party: NRC Staff

Respectfully submitted,

/Signed (electronically) by/
Stephanie N. Liaw
Counsel for the NRC staff
U.S. Nuclear Regulatory Commission
Mail Stop O-15 D21
Washington, DC 20555-0001
(301) 415-2472
Stephanie.Liaw@nrc.gov

Dated at Rockville, Maryland
This 17th day of December, 2010

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "NOTICE OF APPEARANCE FOR STEPHANIE N. LIAW" and the "JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER" have been served upon the following persons by Electronic Information Exchange this 17th day of December, 2010:

Chief Administrative Judge E. Roy Hawkens Atomic Safety and Licensing Board Panel Mail Stop: T-3F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail: Paul.Bollwerk@nrc.gov	Office of Commission Appellate Adjudication Mail Stop O-16C1 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail:OCAAmail@nrc.gov
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Mr. Charles W. Irvine Blackburn Carter, P.C. 4709 Austin Street Houston, TX 77004 E-Mail: charles@blackburncarter.com	Office of the Secretary ATTN: Docketing and Service Mail Stop: O-16C1 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail: HEARINGDOCKET@nrc.gov
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/signed (electronically) by/
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