

February 26, 2011

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board

In the Matter of

ASLBP No. 10-906-02-LR

NextEra Energy Seabrook, LLC
Seabrook Station
(Operating License Renewal)

Docket No. 50-443-LR

February 26, 2011

FRIENDS OF THE COAST AND NEW ENGLAND COALITION, INC.
REQUEST FOR EXTENSION OF TIME- POST-FACTO

Pursuant to 10 C.F.R. § 2.307, Friends of the Coast and New England Coalition, Inc. (Friends/NEC) respectfully requests of the presiding officer in the above captioned matter, an extension of time of three-hours, from Friday, February 25, 2011 at 11:50 PM to Saturday, February 26, 2011 at 2:50 AM in which to file a Motion for Reconsideration of the Atomic Safety and Licensing Board's ("Board") Order and Memorandum of February 15, 2012.

Discussion - As evident from the above dates, Motions for Reconsideration and/or Petitions for Review regarding the Board's Order and Memorandum of February 15, 2011 were due no later than February 25, 2011.

Friends of the Coast/NEC, an intervenor in the above captioned matter; ever conscious of a history of late and defective filings, undertook diligently to file its Motion for Reconsideration within the tens days normally allowed.

However, events, unforeseeable and for which there was no practical remedy, overtook Friends/NEC on the eve of the filing final due date.

- (1) A coastal snowstorm enveloped the Friends/NEC offices in Edgecomb, Maine early on February 25th limiting filing to a dial-up connection, and forestalling travel to file from a remote high-speed connection.
- (2) Attempts to timely file were frustrated by slow load and transmission speeds at NRC EIE site and the Friends/NEC dial up connection.
- (3) This might have been foreseeable, but Friends/NEC Pro Se Representative was in Vermont Tuesday the 22nd and Wednesday the 23th of February testifying before the Vermont State Nuclear Advisory Panel and the Vermont senate Committee on Economic Development; returning to the job on Thursday, the 24th, with a whopping bout of the “flu.” Of a consequence, what may have been foreseeable as a consequence of not being able to travel to a high speed connection was blurred by illness.
- (4) Further, local weather forecasts on Thursday the 24th predicted varying amounts of snow and rain hovering around 1 inch over a few hours; what was experienced was several inches of snow throughout the day resulting in downed power lines and stranded motorists.
- (5) None of this, though it delayed Friends/NEC somewhat, would have prevented filing by 11 PM on February 25, 2011. Friends/NEC truncated and abbreviated its filing in order to be certain that it was filed by 11 PM; but Friends/NEC was frustrated by the extraordinarily slow uptake and response times of the NRC electronic submissions website, that compounded by the fact that the only local internet service that Friends/NEC has available is a dial-up connection, averaging c. 26 kbs/sec.

- (6) In any case, Friends/NEC sincerely hopes that none of the staff or the parties was spending the mid-night hours on a Friday night hovering over a computer waiting to find out what (if anything) Friends/NEC was going to do. But if they were, we sincerely apologize for any inconvenience or concern that this filing on the brink may have caused.
- (7) As Friends/NEC represented to the Board at the Portsmouth, NH, Prehearing Conference, we are making every diligent effort to see to it that our filings are on time, coherent and orderly, we will continue to do our best to avoid any continuing advertences.
- (8) In the interim, in consideration of the foregoing and hoping it won't seriously inconvenience the Board or any of the parties, Friends/NEC respectfully requests that the presiding officer in the above captioned matter grant our request for extension of time-post facto of three hours.
- (9) Friends/NEC did not seek concordance with the other parties with respect to this filing as it is filed as-soon-as-possible following the late filing of the Friends/NEC Motion for Reconsideration; 1:30 AM, Local time. Friends/NEC will seek concordance on Monday morning, February 26th, at the opening of business.
- (10) Should the Board require it, Friends/NEC stands prepared to offer a supporting affidavit.

For Friends of the Coast/ New England Coalition

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