

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE COMMISSION**

In the Matter of
Entergy Corporation
Pilgrim Nuclear Power Station
License Renewal Application

Docket # 50-293-LR

August 29, 2011

**PILGRIM WATCH REQUEST TIME EXTENSION TO RESPOND TO
APPLICANT'S MOTION FOR ISSUANCE OF RENEWED LICENSE (August 23,
2011)**

Pilgrim Watch respectfully requests an extension of time to respond to the Applicant's Motion for Issuance of Renewed License filed August 23, 2011. We request an extension of four days to September 6, the day after Labor Day. The other parties do not object.

The reasons for the request are as follows:

1. Due to hurricane Irene, the storm winds resulted in a power outage in Duxbury, Massachusetts predicted, at this time, to be restored Tuesday (August 30) in the area where Pilgrim Watch's pro se representative's Mary Lampert, electronic and written materials are located. Therefore, the Petitioner is placed in a handicapped position to prepare its response in the requisite ten days.
2. Pilgrim Watch's pro se representative is already at a decided comparative disadvantage to the Applicant due to its representative's pro se status, lack of staff assistance and the pace of recent filings. To do this does not violate any regulatory provisions or reasonable standards of fair play.¹

¹ In NRC proceedings, *pro se* litigants are generally not held to the same high standards of pleading and practice as parties with counsel. *See, e.g., Vermont Yankee I*, CLI-10-17, 72 NRC at __ (slip op. at 56 n.246); *U.S. Enrichment Corp.* (Paducah, Kentucky Gaseous Diffusion Plant), CLI-01-23, 54 NRC 267, 272 (2001); *Consolidated Edison*

3. An additional four days, over the Labor day holiday week-end, would not cause harm to the Applicant and will allow the Petitioner to prepare a proper response to assist the Commission in its deliberations.

The parties were consulted. Entergy does not object. NRC Staff (Susan Uttal) does not object to the request as long as they also are accorded a four day extension to prepare their response. The Massachusetts Attorney General's Office (Matthew Brock) does not object.

This filing is submitted by electronic mailing to the service list because the certificate required to file on the EHD is not accessible due to the power outage.

Respectfully submitted,

(Electronically signed)

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