

September 30, 2011

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
NextEra Energy Seabrook, LLC	)	Docket No. 50-443-LR
	)	
(Seabrook Station)	)	
	)	ASLBP No. 10-906-02-LR
(Operating License Renewal)	)	

**Joint Motion to Amend the Initial Scheduling Order**

NextEra Energy Seabrook, LLC (hereinafter “NextEra”), on behalf of itself and the NRC Staff, Intervenor Beyond Nuclear, Sierra Club of New Hampshire, and Seacoast Anti-Pollution League, and Intervenor Friends of the Coast and the New England Coalition, hereby moves the Atomic Safety and Licensing Board (“Board”) to further amend its April 4, 2011 Initial Scheduling Order to modify its deadline for submitting a proposed protective order and nondisclosure agreement.

The Board recently granted NextEra’s motion to modify the Initial Scheduling Order, moving the deadline for production of mandatory disclosures from October 3, 2011 to April 2, 2012. Order (Granting Motion to Modify Deadline for Initial Disclosures) (Aug. 23, 2011). At that time, no change was made to Paragraph B of the Initial Scheduling Order, which requires the parties to submit a proposed protective order, also by October 3, 2011.

In accordance with the Board’s Initial Scheduling Order, the parties have conferred for the purpose of developing a proposed protective order and nondisclosure

agreement concerning the handling of documents that are proprietary or otherwise sensitive, but have not yet reached an agreement to submit to the Board. The parties have also engaged in discussions regarding other aspects of discovery management. The parties would prefer to reach agreement among themselves and believe that they can resolve these issues by November 10, if not sooner. In light of these ongoing discussions and of the Board's earlier amendment of the Initial Scheduling Order to no longer require mandatory disclosures on October 3, the parties jointly request the Board to amend Paragraph B of its Initial Scheduling Order to require the submittal of a proposed protective order by November 10, 2011.

Respectfully Submitted,

/Signed electronically by Steven Hamrick/

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing “Joint Motion to Amend the Initial Scheduling Order,” were provided to the Electronic Information Exchange for service to those individuals listed below and others on the service list in this proceeding, this 30th day of September, 2011.

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/Signed electronically by Steven Hamrick/

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Steven Hamrick