

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Lawrence G. McDade, Chairman
Dr. Kaye D. Lathrop
Dr. Richard E. Wardwell

In the Matter of)	Docket Nos. 50-247-LR
)	and
)	50-286-LR
ENTERGY NUCLEAR OPERATIONS, INC.)	
)	
(Indian Point Nuclear Generating Units 2 and 3))	
_____)	Date: November 8, 2012

**CLEARWATER’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
FILE A MOTION REGARDING RELEVANT NEW INFORMATION THAT
BECAME APPARENT AFTER HURRICANE SANDY**

Hudson River Sloop Clearwater, Inc. (“Clearwater”) hereby moves for an extension of time to file a motion requesting the Atomic Safety and Licensing Board (the “Board”) to allow Clearwater to present evidence of how Hurricane Sandy had a disparate impact on Environmental Justice populations, including those in prisons, hospitals, and nursing homes.¹ Clearwater respectfully requests that the filing date of that motion be moved from November 9, 2012, to November 14, 2012. After considerable discussion, neither Entergy nor the NRC Staff oppose the relief sought in this motion, nor does New York State.²

¹ This cursory description of the motion is not exhaustive, Clearwater reserves the right to file its Motion regarding any new information arising out of Hurricane Sandy that is relevant.

² Entergy’s acquiescence in Clearwater’s motion for extension of time should not be taken as agreement that the motion Clearwater intends to file is in any way relevant to issues within the scope of license renewal or this proceeding.

The primary reason for this motion is that Clearwater's counsel, Richard Webster Esq., returned from Florida to New Jersey on November 1 to a dwelling without heat, power, and high-speed internet access. Northern New Jersey also experienced severe shortages of gasoline. Mr. Webster therefore elected not to drive to conserve his ability to leave the area, if necessary. Only very limited public transport was available. Ms. Raimundi, Clearwater's in-house representative also experienced similar difficulties. Clearwater's ability to work on gathering and collating relevant information was therefore severely impaired. The time extension requested will provide Clearwater with 10 days in which its representatives have functional offices, as envisaged by the Part 2 regulations.

Respectfully Submitted,

/s/

Richard Webster, Esq.
Public Justice, P.C.
1825 K Street, N.W. Suite 200
Washington, D.C. 20006
rwebster@publicjustice.net
202-797-8600

Dated: November 8, 2012