

February 6, 2015

United States of America
Nuclear Regulatory Commission
Before the Commission

In the Matter of)
TENNESSEE VALLEY AUTHORITY) Docket No. 50-391-OL
(Watts Bar Nuclear Plant, Unit 2))
)

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
UNOPPOSED MOTION TO PERMIT CORRECTION OF FILING**

Pursuant to 10 C.F.R. § 2.323(b), Southern Alliance for Clean Energy (“SACE”) hereby requests the U.S. Nuclear Regulatory Commission (“NRC”) to permit SACE to correct its filing of February 5, 2015, by adding SACE’s Motion for Leave to File a New Contention Concerning TVA’s Failure to Comply with 10 C.F.R. § 50.34(b)(4) (“Motion for Leave to File a New Contention”). SACE intended to file the Motion for Leave to File a New Contention along with the Motion to Reopen the Record and attachments that were filed on February 5, but inadvertently omitted it from the filing. The error was pointed out to SACE’s counsel by the Secretary’s office the following morning, whereupon SACE’s counsel immediately re-filed the entire package of pleadings.

SACE respectfully requests the Commission to excuse the clerical error of its counsel by deeming SACE’s Motion for Leave to File a New Contention to have been filed on February 5, 2015. In making this request, SACE wishes to clarify that it does not seek to address the timeliness of its Motion for Leave to File a New Contention in any respect other than the date of its filing.

Counsel for the Tennessee Valley Authority and the NRC Staff have stated that they do not object to this motion, on condition that the 25-day period for their response provided by 10

C.F.R. § 2.309(h)(1) be measured from February 6, *i.e.*, the date when they received the Motion for Leave to File a New Contention.

Respectfully submitted,

[Electronically signed by]

Diane Curran

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CERTIFICATE OF SERVICE

I certify that on February 6, 2015, on behalf of Southern Alliance for Clean Energy, I posted on the NRC's Electronic Information Exchange SOUTHERN ALLIANCE FOR CLEAN ENERGY'S UNOPPOSED MOTION TO PERMIT CORRECTION OF FILING. It is my understanding that as a result, the NRC Commissioners, Atomic Safety and Licensing Board, and parties to this proceeding were served.

Respectfully submitted,

Electronically signed by

Diane Curran

Harmon, Curran, Spielberg & Eisenberg, L.L.P.

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