

June 12, 2018

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD**

|                             |   |                       |
|-----------------------------|---|-----------------------|
| In the Matter of            | ) |                       |
|                             | ) |                       |
| Tennessee Valley Authority  | ) | Docket No. 52-047-ESP |
|                             | ) |                       |
| (Clinch River Nuclear Site) | ) |                       |
| _____                       | ) |                       |

**INTERVENORS' UNOPPOSED MOTION TO ESTABLISH  
JUNE 22, 2018 AS A FIXED DEADLINE FOR FILING A SINGLE  
REPLY TO RESPONSES TO INTERVENORS' MOTION TO  
ADMIT NEW CONTENTIONS 4 AND 5**

**I. INTRODUCTION**

Pursuant to 10 C.F.R. §§ 2.323, Intervenors Southern Alliance for Clean Energy and Tennessee Environmental Council hereby request the Atomic Safety and Licensing Board (“ASLB”) to establish June 22, 2018 as a fixed deadline for filing a single reply to responses by Tennessee Valley Authority (“TVA”) and the U.S. Nuclear Regulatory Commission (“NRC”) Staff to Intervenors’ Motion for Leave to File Contention 4 (Inadequate Discussion of Environmental Impacts of Spent Fuel Pool Fires) and Contention 5 (Impermissible Discussion of Energy Alternatives and Need for the Proposed SMR) (May 21, 2018) (“Intervenors’ Motion for Leave to File New Contentions”). Neither TVA nor the Staff opposes this motion.

Yesterday, June 11, 2018, the NRC Staff filed a Motion to Dismiss Contention 2 as Moot and Answer to Intervenors’ Motion for Leave to File Contentions 4 and 5. TVA also filed a Motion to Dismiss Contention 2 as Moot the same day, but unlike the Staff it did not file an answer to Intervenors’ Motion for Leave to File New Contentions. Under NRC regulation 10

C.F.R. 2.309(i), TVA's response to Intervenors' Motion for Leave to File New Contentions is not due until June 15.

Intervenors were not expecting the NRC Staff to file a response to Contentions 4 and 5 early, and instead anticipated that both the Staff and TVA would file their responses on June 15. Therefore, Intervenors' counsel made a plan with Intervenors' experts to review both the Staff's and TVA's responses the week of June 18 and file a single reply by June 22. By this motion, Intervenors seek to establish a predictable schedule for preparing and filing a single consolidated reply to TVA's and the Staff's responses to Intervenors' new contentions. This modest schedule adjustment would conserve the resources of Intervenors, the other parties, and the ASLB.

Accordingly, Intervenors request the Board to establish June 22 as the due date for Intervenors' reply to TVA's and the Staff's responses to Intervenors' Motion for Leave to File New Contentions.

Respectfully submitted,

          /signed electronically by/            
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## **CERTIFICATE OF SERVICE**

I certify that on June 12, 2018, I posted copies of the foregoing INTERVENORS' UNOPPOSED MOTION TO ESTABLISH JUNE 22, 2018 AS A FIXED DEADLINE FOR FILING A SINGLE REPLY TO RESPONSES TO INTERVENORS' MOTION TO ADMIT NEW CONTENTIONS 4 AND 5 on the NRC's Electronic Information Exchange System.

          /signed electronically by/            
Diane Curran