

April 8, 2021

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

_____	)	
In the Matter of	)	
	)	
Tennessee Valley Authority	)	Docket Nos. EA-20-006, EA-20-007
	)	
(Enforcement Action)	)	
_____	)	

**TVA’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO NRC STAFF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION**

In accordance with 10 C.F.R. §§ 2.323 and 2.706(b)(2), the Tennessee Valley Authority (“TVA”) respectfully requests that the Atomic Safety and Licensing Board grant TVA a one-week extension of time, to April 22, 2021, to respond to the “NRC Staff Interrogatories and Requests for Production,” served on April 1, 2021.<sup>1</sup> In support of this request, TVA states as follows:

1. The NRC Staff has served seventeen (17) interrogatories on TVA, fourteen (14) of which include multiple sub-questions. In total, there are approximately 70 discrete questions and sub-questions included in the NRC Staff’s interrogatories. In addition, certain interrogatories request that TVA answer multiple sub-questions for each instance of an event or action asserted to have occurred.

<sup>1</sup> Under 10 C.F.R. § 2.706(b)(2), responses to interrogatories are due “within fourteen (14) days after service of the interrogatories, or within such shorter or longer period as the presiding officer may allow.”

2. TVA in good faith believes that more time is required to consult with relevant witnesses to fully answer the NRC Staff's interrogatories.

3. TVA submits that this brief extension of time will not adversely affect the schedule for this proceeding.

4. In accordance with 10 C.F.R. § 2.323(b), undersigned counsel are authorized to represent that the NRC Staff consents to TVA's extension request.

Respectfully submitted,

*/Electronically signed by Timothy J. V. Walsh/*  
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Counsel for Tennessee Valley Authority

Dated: April 8, 2021

April 8, 2021

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Tennessee Valley Authority	)	
Chattanooga, Tennessee	)	
_____	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing TVA's Unopposed Motion for Extension of Time to Respond to NRC Staff Interrogatories and Requests for Production have been served through the E-Filing system in the above-captioned proceeding this 8th day of April, 2021.

*/Electronically signed by Timothy J. V. Walsh/*