

August 16, 2023

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

In the matter of
Pacific Gas and Electric Company
Diablo Canyon Independent
Spent Fuel Installation

Docket No. 72-26

**SAN LUIS OBISPO MOTHERS FOR PEACE'S UNOPPOSED
MOTON FOR EXTENSION OF TIME TO RESPOND TO
PACIFIC GAS AND ELECTRIC COMPANY'S BRIEF ON APPEAL OF LBP-23-07**

Pursuant to 10 C.F.R. § 2.307(a), San Luis Obispo Mothers for Peace ("SLOMFP") hereby requests a two-week extension of time to respond to Pacific Gas & Electric Co.'s ("PG&E's") Brief in Support of Pacific Gas and Electric Company's Appeal of LBP-23-7 ("Appeal Brief"), filed August 14, 2023. The extension would postpone the filing deadline from September 8 to September 22, 2023.

PG&E and the U.S. Nuclear Regulatory Commission ("NRC" or "Commission") Staff have agreed to the requested extension. The Staff has requested that the new deadline should apply to the Staff as well.

SLOMFP respectfully submits that this extension requests satisfies 10 C.F.R. § 2.307(a) because it has been agreed to by PG&E and the Staff and because SLOMFP has good cause to seek an extension, as follows:

1. Undersigned counsel is the sole attorney representing SLOMFP in this proceeding.
2. Undersigned counsel has several other obligations that will prevent her from working on the responsive brief during at least two weeks of the twenty-five days provided by 10 C.F.R § 2.311(b):

- a. During August, counsel for SLOMFP will be attending a long-planned family reunion from August 18-27, and also has previous plans to visit out-of-town family over the Labor Day holiday.
- b. For the remainder of August, undersigned counsel will be preparing an opening brief for filing on September 1, 2023 in *Beyond Nuclear v. NRC* (D.C. Cir., No. 20-1187). In addition, during September, she will be reviewing and preparing a reply to the NRC and U.S. Department of Justice's brief in *San Luis Obispo Mothers for Peace, et al. v. NRC* (9th Cir., No. 23-852), which she expects to receive on August 29, 2023.

Accordingly, SLOMFP requests a two-week extension of time to respond to PG&E's appeal of LBP-23-07, or until September 22, 2023. SLOMFP requests that the extension be applied to the NRC Staff as well.

Respectfully submitted,

/signed electronically by/

Diane Curran

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CERTIFICATE OF SERVICE

I certify that on August 16, 2023, I posted SAN LUIS OBISPO MOTHERS FOR PEACE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PACIFIC GAS AND ELECTRIC COMPANY'S BRIEF ON APPEAL OF LBP-23-07 on the NRC's Electronic Information Exchange.

/signed electronically by/
Diane Curran