

September 10, 2001

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

DOCKETED
USNRC

September 13, 2001 (5:48PM)

Before Administrative Judges:
Thomas S. Moore, Chairman
Charles N. Kelber
Peter S. Lam

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of)

DUKE COGEMA STONE & WEBSTER)

(Savannah River Mixed Oxide Fuel
Fabrication Facility))

Docket No. 0-70-03098-ML

ASLBP No. 01-790-01-ML

GEORGIANS AGAINST NUCLEAR ENERGY'S
MOTION FOR LEAVE TO ENTER LIMITED
APPEARANCE BY DIANE CURRAN

Georgians Against Nuclear Energy ("GANE") hereby moves for leave to enter a limited appearance by GANE's legal advisor, Diane Curran, for the purpose of presenting oral argument at the September 21 prehearing conference regarding GANE's Motion to Dismiss.¹

The sole purpose of this request is to permit GANE's legal advisor to make arguments regarding the Motion to Dismiss. Otherwise, GANE intends to continue to represent itself *pro se* regarding issues of standing and the admissibility of contentions. GANE has asked Ms. Curran to be present at the prehearing conference to advise GANE's representative, Glenn Carroll, during the oral argument on standing and admissibility; however, all oral statements on those issues will be made by Ms. Carroll.

GANE also intends to continue to represent itself on all other matters, throughout any hearing that is held.

With respect to the Motion to Dismiss, GANE believes that it would be most efficient and effective for Ms. Curran to present oral argument, because the issues involved are legal matters on which she has particular expertise and experience, and because she is responsible for the legal theories in the Motion.

GANE attempted to discuss this matter with counsel for the NRC Staff and DCS regarding this request. NRC did not reply to GANE in time for the filing of this Motion and DCS responded as follows: "Counsel for DCS has stated that it has no role in GANE's selection of legal counsel, but that if GANE does intend to be represented by counsel, such counsel must enter a notice of appearance in this proceeding."

Respectfully submitted,



Glenn Carroll²
for Georgians Against Nuclear Energy
139 Kings Highway
Decatur, GA 30030
404-378-4263

Dated September 10, 2001
in Decatur, Georgia

¹ Georgians Against Nuclear Energy's Motion to Dismiss Licensing Proceeding Or, In the Alternative, Hold It In Abeyance (August 13, 2001).

² This Motion was prepared with substantial assistance from GANE's legal adviser, Diane Curran.

CERTIFICATE OF SERVICE
by Georgians Against Nuclear Energy
(Docket # 70-3098, ASLBP # 01-790-01-ML)

I hereby certify that copies of GANE's Motion for Leave to Enter
Limited Appearance by Diane Curran were sent to the following list via e-mail
with paper copies served via U.S. Postal Service First-Class Mail.

Rulemakings and Adjudications Staff
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
hearingdocket@nrc.gov

Administrative Judge Thomas S. Moore
Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
tsm2@nrc.gov

Administrative Judge Charles N. Kelber
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
cnk@nrc.gov

Administrative Judge Peter S. Lam
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
psl@nrc.gov

John T. Hull, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
jth@nrc.gov

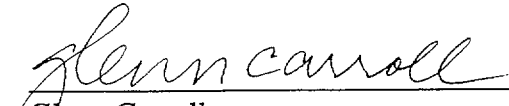
Donald J. Silverman, Esq.
Morgan, Lewis & Bockius
1800 M Street N.W.
Washington, D.C. 20036
dsilverman@morganlewis.com
apolonsky@morganlewis.com

Ruth Thomas, President
Environmentalists, Inc.
1339 Sinkler Road
Columbia, SC 29206

Donald J. Moniak
Blue Ridge Environmental Defense
League
P.O. Box 3487
Aiken, SC 29802
donmoniak@earthlink.net

Edna Foster
120 Balsam Lane
Highlands, NC 28741
emfoster@gte.net

Respectfully submitted,


Glenn Carroll
for Georgians Against Nuclear Energy
September 10, 2001 in Decatur, Georgia