

August 30, 2006

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
DAVID GEISEN	)	Docket No. IA-05-052
	)	ASLBP No. 06-845-01-EA
	)	
DALE L. MILLER	)	Docket No. IA-05-053
	)	ASLBP No. 06-846-02-EA
	)	
STEVEN P. MOFFITT	)	Docket No. IA-05-054
	)	ASLBP No. 06-847-03-EA
	)	

CONSENT MOTION FOR AN EXTENSION OF TIME

INTRODUCTION

The Staff hereby moves for a two week extension of time to update its document disclosures in accordance with 10 C.F.R. § 2.336(d). In accordance with 10 C.F.R. § 2.323 the Staff contacted Counsel to all the parties in the above captioned proceedings. All parties indicate that they have no objection to the proposed extension of time.

DISCUSSION

On Friday, August 18<sup>th</sup>, 2006 the Staff obtained five boxes of additional documents from FirstEnergy Nuclear Operating Company. A cursory review of those documents by NRC Staff indicates that some of the documents may provide support for or opposition to the Orders which are the subject of the above captioned proceedings. In accordance with § 2.336(d) the Staff intends to disclose these documents to all parties. The documents are currently in the NRC Region III Office. The documents will be shipped to NRC Headquarters today. The Staff needs an additional two weeks in order to copy and index the documents and provide them to all parties. The Staff will produce the documents as soon as possible, but no later than

September 15, 2006.

CONCLUSION

Therefore, the Staff respectfully moves for an extension of time to complete its § 2.336(d) disclosures.

Respectfully Submitted,

***/RA by Sara E. Brock/***

Sara E. Brock  
Mary C. Baty  
Michael A. Spencer  
Counsel for the NRC Staff

Dated at Rockville, Maryland  
this 30<sup>th</sup> day of August, 2006

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CERTIFICATE OF SERVICE

I hereby certify that copies of "CONSENT MOTION FOR AN EXTENSION OF TIME" in the above captioned proceeding have been served on the following persons by deposit in the United States mail; through deposit in the Nuclear Regulatory Commission internal mail system as indicated by an asterisk (\*); and by electronic mail as indicated by a double asterisk (\*\*) on this 30<sup>th</sup> day of August, 2006.

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