

UNITED STATES OF AMERICA
NULCEAR REGULATORY COMMISION
BEFORE THE COMMISSION

In the Matter of:)
) Docket No. 50-255-LA-2
ENTERGY NUCLEAR OPERATIONS, INC.,)
) August 7, 2015
(Palisades Nuclear Plant))

MOTION BY SIERRA CLUB FOR PERMISSION TO FILE AMICUS BRIEF

Comes now the Sierra Club, pursuant to 10 C.F.R. § 2.315, and in support of this Motion for Permission to File Amicus Curiae Brief, states to the Commission as follows:

1. The Sierra Club supports the decision of the ASLB in this case granting the Intervenors a hearing on their contention regarding Entergy's license amendment request.

2. The Sierra Club is the nation's largest grassroots environmental organization, with over 600,000 members. Its Michigan Chapter has approximately 16,000 members. The Sierra Club supports sustainable energy alternatives that do not harm the environment. The Sierra Club opposes nuclear power because its fuel cycle from uranium mining to spent radioactive fuel poses grave dangers to the environment. In addition, reliance on nuclear power unjustifiably delays the beneficial transition to clean and renewable energy sources.

3. With specific reference to the Palisades Nuclear Plant and the embrittlement of the reactor vessel at the

plant, members of the Michigan Chapter are at risk if the embrittled reactor vessel shatters and disperses radioactive material into the environment. This can affect the air, water and soil upon which Michigan residents depend. Therefore, the attempt by Entergy to shortcut assurances that the reactor pressure vessel is safe poses grave risks to the Sierra Club and its members in the Michigan Chapter.

4. The Sierra Club's amicus curiae brief is desirable in this case because it will present the perspective of the many Sierra Club members who are residents of Michigan and are affected by the outcome of this case. The brief will also emphasize the far-reaching impacts of a decision in this case. A decision allowing Entergy to avoid testing the material in the pressure vessel would be a bad precedent for actions involving embrittlement at other aging reactors.

5. Pursuant to 10 C.F.R. § 2.323(b), undersigned counsel certifies that he has contacted the other parties to this proceeding about the filing of the Sierra Club's amicus curiae brief. The Intervenors have no objection to the filing of the brief. Entergy Nuclear Operations and the NRC staff have no objection to the filing of the amicus curiae brief but reserve the right to respond to it.

6. The amicus curiae brief is hereto attached.

WHEREFORE, the Sierra Club requests permission to file an amicus curiae brief in support of the ASLB decision.

/s/ *Wallace L. Taylor*

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ATTORNEY FOR SIERRA CLUB

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I certify that, on August 7, 2015, copies of Sierra Club's Motion for Permission to File Amicus Brief were served upon the Electronic Information Exchange (the NRC's E-Filing System) in the above-captioned proceeding.

/s/ *Wallace L. Taylor*

WALLACE L. TAYLOR