

BEFORE THE UNITED STATES
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF)
) Docket No. 72-1051
HOLTEC INTERNATIONAL)
)
(Consolidated Interim Storage) January 11, 2019
Facility Project))

**SIERRA CLUB'S MOTION TO ADOPT THE CONTENTIONS OF DON'T WASTE
MICHIGAN, CITIZENS ENVIRONMENTAL COALITION, CITIZENS FOR
ALTERNATIVES TO CHEMICAL CONTAMINATION, NUCLEAR ENERGY
INFORMATION SERVICE, NUCLEAR ISSUES STUDY GROUP, SAN LUIS
OBISPO MOTHERS FOR PEACE, AND PUBLIC CITIZEN**

Comes now Sierra Club and in support of this Motion to
Adopt the Contentions of Don't Waste Michigan, et al.,
states as follows:

1. Sierra Club and the above-named parties have many of
the same issues and concerns regarding the proposed Holtec
CIS facility at issue in this proceeding. It would be in the
interests of efficiency and fully litigating the issues in
this proceeding to allow the parties to adopt each others'
contentions.

2. Pursuant to 10 C.F.R. § 2.309(f)(3), Sierra Club
moves to adopt all contentions filed by the above-named
parties, Don't Waste Michigan, et al.

3. Sierra Club designates Terry J. Lodge as its
representative regarding the Don't Waste Michigan et al.
contentions adopted by Sierra Club with the authority to act
for Sierra Club as to those contentions.

4. Pursuant to 10 C.F.R. § 2.323(b), counsel for the Movants certifies that a sincere effort has been made to confer with other parties to resolve the issues raised in this Motion. Holtec opposes the Motion, NRC Staff have no objection to the Motion, and other parties have taken no position on the Motion.

WHEREFORE, Sierra Club requests that it be allowed to adopt all of the contentions of Don't Waste Michigan, et al., and to designate Terry J. Lodge as Sierra Club's representative with respect to those contentions.

/s/ Wallace L. Taylor

WALLACE L. TAYLOR
Law Offices of Wallace L. Taylor
4403 1st Ave. S.E., Suite 402
Cedar Rapids, Iowa 52402
319-366-2428: (Fax) 319-366-3886
e-mail: wtaylorlaw@aol.com

ATTORNEY FOR SIERRA CLUB

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CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I certify that, on this date, copies of Motion to Adopt Contentions of Don't Waste Michigan et al. 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
Law Offices of Wallace L. Taylor
4403 1st Ave. S.E., Suite 402
Cedar Rapids, Iowa 52402
319-366-2428; (Fax) 319-366-3886
e-mail: wtaylorlaw@aol.com

ATTORNEY FOR SIERRA CLUB