

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
OFFICE OF THE SECRETARY

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
E. Roy Hawkens, Chair
Dr. Paul B. Abramson
Dr. Anthony J. Baratta

In the Matter of)	
)	Docket No. 50-0219-LR
AMERGEN ENERGY COMPANY, LLC)	
)	ASLB No. 06-844-01-LR
(License Renewal for the Oyster Creek)	
Nuclear Generating Station))	June 23, 2006
)	

MOTION FOR LEAVE TO SUPPLEMENT THE PETITION

Nuclear Information and Resource Service, Jersey Shore Nuclear Watch, Inc., Grandmothers, Mothers and More for Energy Safety, New Jersey Public Interest Research Group, New Jersey Sierra Club, and New Jersey Environmental Federation (collectively “Citizens” or “Petitioners”) submit this Motion because AmerGen provided additional commitments and information as part of the license renewal process on June 20, 2006.

The Atomic Safety and Licensing Board (the “Board”) in its Order of June 6, 2006 invited Citizens to petition to add a new contention and directed Citizens to limit their argument to AmerGen's docketed commitment of April 4, 2006. LBP-06-16 at 9 (Jun. 6, 2006) (unpublished). Petitioners were given until June 26, 2006 to do so. *Id.* However, on June 20, 2006, AmerGen provided NRC with supplemental information concerning their aging management program for the Oyster Creek drywell shell during the license

renewal period as well as additional commitments. Letter from Gallagher to NRC, dated June 20, 2006.

Citizens request leave to submit a supplement to their Petition to address AmerGen's new commitments and the new information provided in the June 20, 2006 letter. In addition, Citizens request the Board to order AmerGen and NRC Staff to respond to both the Petition and the supplement together ten days after the supplement is filed. This would allow the Board to evaluate the most current status of the dispute between AmerGen and Citizens, and would avoid needless duplicative rounds of filings.

For the foregoing reasons, the Board should grant leave for Petitioners to supplement the current pleading and order AmerGen and NRC to respond to the Petition and the supplement at the same time.

Respectfully submitted

/s/

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Dated: June 23, 2006