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FEB 17 2012

United States Court of Appeals
District of Columbia Circuit

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

FILED

FEB 17 2012

CLERK

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BLUE RIDGE ENVIRONMENTAL
DEFENSE LEAGUE, CENTER FOR A
SUSTAINABLE COAST, GEORGIA WOMEN'S
ACTION FOR NEW DIRECTIONS, and
SOUTHERN ALLIANCE FOR CLEAN ENERGY,

Petitioners

Case No. 12-1105

v.

UNITED STATES NUCLEAR
REGULATORY COMMISSION, and
UNITED STATES OF AMERICA,

Respondents.
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**PETITION FOR JUDICIAL REVIEW OF
NRC MEMORANDUM AND ORDER CLI-12-02**

Pursuant to § 189 of the Atomic Energy Act, 42 U.S.C. § 2239, and 28 U.S.C. §§ 2341-2344; the Administrative Procedures Act, 5 U.S.C. § 551 *et seq.*; and Rule 15 of the Federal Rules of Appellate Procedure, the petitioners, Blue Ridge Environmental Defense League, Center for a Sustainable Coast, Georgia Women's Action for New Directions, and Southern Alliance for Clean Energy, by and through the undersigned counsel, hereby petition this Court for review of the United States Nuclear Regulatory Commission's ("NRC") Memorandum and

Order, CLI-12-02 (February 9, 2012), authorizing issuance of a combined license (“COL”) and extended limited work authorization (“LWA”) for Units 3 and 4 of the Vogtle Electric Generating Plant to the Southern Nuclear Operating Company (Attached). Petitioners contend that in authorizing issuance of the COL and LWA, the NRC acted arbitrarily, abused its discretion, and violated the National Environmental Policy Act, the Administrative Procedures Act, the Atomic Energy Act, the Commission’s policies and regulations, the Council on Environmental Quality’s regulations, and other applicable laws and regulations in issuing the COL and LWA.

The Petitioners are public interest organizations who were intervenors in the NRC Docket Nos. 52-025-COL & 52-026-COL for the Combined License for Vogtle Electric Generating Plant Units 3 and 4 and participated throughout the licensing procedure. This filing is within the 60-day period established by the Hobbs Act for bringing judicial review and is therefore timely. 28 U.S.C. § 23244. Venue is appropriate within the D.C. Circuit pursuant to 28 U.S.C. § 2343.

Therefore, the Petitioners, Blue Ridge Environmental Defense League, Center for a Sustainable Coast, Georgia Women's Action for New Directions, and Southern Alliance for Clean Energy respectfully request that this Court review the NRC’s Memorandum and Order, CLI-12-02, and vacate it, and remand the matter to the NRC for further analysis and the preparation and issuance of a supplemental

environmental impact statement, and grant any other relief that the Court may deem just and appropriate.

Respectfully submitted,



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February 16, 2012

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PETITIONERS' RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure Rule 26.1 and Circuit Rule 26.1, Petitioners make the following disclosures:

Blue Ridge Environmental Defense League, Inc. (BREDL): BREDL has no parent companies, and there are no publicly held companies that have a 10 percent or greater ownership interest in BREDL.

BREDL, a corporation organized and existing under the laws of the State of North Carolina, is a regional, community-based non-profit, environmental

organization whose founding principles are earth stewardship, environmental democracy, social justice, and community empowerment. BREDL encourages government agencies and citizens to take responsibility for conserving and protecting our natural resources. BREDL advocates grassroots involvement to empower whole communities in environmental issues. BREDL also functions as a “watchdog” of the environment by monitoring issues and holding government officials accountable for their actions.

Center for a Sustainable Coast, Inc.: Center for a Sustainable Coast has no parent companies, and there are no publicly held companies that have a 10 percent or greater ownership interest in the Center for a Sustainable Coast.

Center for a Sustainable Coast, a corporation organized and existing under the laws of the State of Georgia, is a non-profit, membership-supported organization defending the public interest in issues related to coastal Georgia’s growth, economy, and environment. The Center combines education, advocacy, technical assistance, and legal action to implement its comprehensive mission, which is the conservation and sustainable use of the region’s resources – natural, historic, and economic.

Georgia Women’s Action for New Directions, Inc. Georgia Wand, Inc. f/k/a Women’s Action for New Directions, Inc, “WAND”, Inc. (Georgia

WAND): Georgia WAND has no parent companies, and there are no publicly held companies that have a 10 percent or greater ownership interest in Georgia WAND.

Georgia WAND, a corporation organized and existing under the laws of the State of Georgia, is a non-profit, membership organization. It is also a chapter of a national organization, Women's Action for New Directions. Women's Action for New Directions' mission is to act politically to reduce violence, and to redirect excessive military resources toward unmet human and environmental needs.

Women's Action for New Directions also works on issues surrounding health and social justice.

Southern Alliance for Clean Energy, Inc.: Southern Alliance for Clean Energy has no parent companies, and there are no publicly held companies that have a 10 percent or greater ownership interest in the Southern Alliance for Clean Energy.

Southern Alliance for Clean Energy, a corporation organized and existing under the laws of the State of Tennessee, is a non-profit, non-partisan, membership organization that promotes responsible energy choices that solve global warming problems and ensure clean, safe, and healthy communities throughout the Southeast. Southern Alliance for Clean Energy has staff and members throughout the Southeast, including offices in Atlanta and Savannah, Georgia.

Respectfully submitted,



Diane Curran

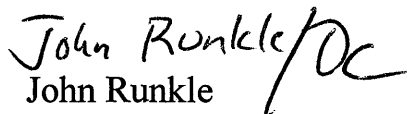
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February 16, 2012

CERTIFICATE OF SERVICE

I certify that on February 16, 2012, I served the foregoing Petition for Review of CLI-12-02, Petition for Review of AP1000 Rule, and corresponding Rule 16.1 Disclosure Statements on the following by first-class mail:

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