

RELATED CORRESPONDENCEDOCKETED
USNRC

October 13, 2004 (8:05AM)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONOFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

In the Matter of

Docket No. 52-007-ESP

Exelon Generation Company, LLC

ASLBP No. 04-821-01-ESP

(Early Site Permit for Clinton ESP Site)

**ADDITIONAL DISCLOSURES OF INTERVENORS ENVIRONMENTAL LAW AND
POLICY CENTER, BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE,
NUCLEAR INFORMATION AND RESOURCE SERVICE,
NUCLEAR ENERGY INFORMATION SERVICE, AND PUBLIC CITIZEN**

Pursuant to 10 C.F.R. 2.336(a) and (d), Intervenors Environmental Law and Policy Center, Blue Ridge Environmental Defense League, Nuclear Information and Resource Service, Nuclear Energy Information Service, and Public Citizen hereby provide additional disclosures that are relevant to the Intervenors' Clean Energy Alternatives Contention that the Licensing Board Panel admitted in its August 6, 2004 Memorandum and Order. These disclosures update the Intervenors' initial disclosures which were filed on September 7, 2004.

I. Expert Witness

No update since initial disclosure.

II. Documents, Data Compilations, and Tangible Things

Pursuant to 10 C.F.R. 2.336(a)(2), Intervenors disclose a description by category and location of the following additional document in their possession that may be relevant to the Clean Energy Alternatives contention.

1. *Renewable Energy: Wind Power's Contribution to Electric Power Generation and Impact on Farms and Rural Communities*. United States Government Accountability Office. September 2004. This document provides an analysis of the potential for and benefits of wind power in the United States. It is available online at: <http://www.gao.gov/new.items/d04756.pdf>.

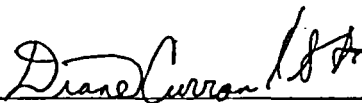
III. Privilege Log

Pursuant to 10 C.F.R. 2.336(a)(3), Intervenor provide the following list of additional relevant documents for which a claim of privilege or protected status is exercised. All documents are being withheld on the basis of the attorney-client privilege, litigation strategy privilege, and/or work product doctrine.

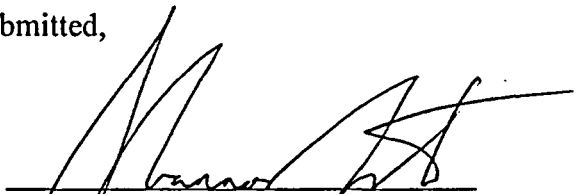
DATE	AUTHOR	DOCUMENT TYPE DESCRIPTION	RECIPIENT(S)
September 24, 2004	Shannon Fisk	Email and Document Regarding response strategy to Exelon's answer to the NRC Staff's Request for Additional Information ("RAI") about Clean Energy Alternatives and forwarding Exelon's answer	Howard Learner, Bruce Biewald
September 28, 2004	Bruce Biewald	Email Regarding response strategy to Exelon's answer to the RAI and referencing confidential communications between attorneys for Intervenor's	Howard Learner, Shannon Fisk
September 29, 2004	Shannon Fisk	Email Regarding response strategy to Exelon's answer to the RAI and analysis of the legal standards at issue in this proceeding	Howard Learner, Bruce Biewald
October 7, 2004	Shannon Fisk	Email Regarding telephone conversation with Exelon counsel Steven Frantz	Howard Learner

Dated: October 12, 2004

Respectfully Submitted,



Attorney on Behalf of Petitioner
Blue Ridge Environmental Defense League



Attorneys on Behalf of Petitioner
Environmental Law and Policy Center

Diane Curran
Harmon, Curran, Spielberg & Eisenberger LLP
1726 M Street NW, Suite 600
Washington D.C. 20036
dcurran@harmoncurran.com



On Behalf of Petitioner
Nuclear Energy Information Service

Dave Kraft
P.O. Box 1637
Evanston, IL 60204-1637
(847) 869-7650



On Behalf of Petitioner Public Citizen

Michele Boyd
215 Pennsylvania Ave. SE
Washington D.C. 20003
(202) 454-5134
mboyd@citizen.org

Howard A. Learner
Shannon Fisk
35 East Wacker Drive, Suite 1300
Chicago, IL 60601
(312) 673-6500
hlearner@elpc.org and sfisk@elpc.org



On Behalf of Petitioner
Nuclear Information and Resource Services

Paul Gunter
1424 16th St. NW #404
Washington D.C. 20036
(202) 328-0002

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CERTIFICATION OF SHANNON FISK

Pursuant to 10 C.F.R. 2.336(c) I, Shannon Fisk, an attorney, hereby certify as follows:

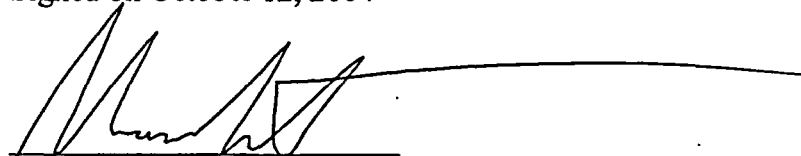
1. I am an attorney employed by the Environmental Law & Policy Center, located at 35 East Wacker Dr., Chicago, IL 60601, and I am one of the counsel for Intervenor Environmental Law and Policy Center, et al. in the above-captioned docket.

2. Included with this certification are the additional disclosures required under 10 C.F.R. 2.336(a) and (d) for the Intervenor that I and my co-counsel Howard A. Learner represent in the above-captioned docket.

3. To the best of my knowledge, the attached disclosures include all additional relevant materials required by 10 C.F.R. 2.336(a) and (d) and are accurate and complete as of the date of this certification.

I certify under penalty of perjury that the foregoing is true and correct.

Signed on October 12, 2004



Shannon Fisk
One of the Attorneys for the
Intervenor Environmental Law and Policy Center

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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

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Docket No. 52-007-ESP

ASLBP No. 04-821-01-ESP

CERTIFICATE OF SERVICE

I, Shannon Fisk, hereby certify that copies of the Additional Disclosures of Intervenors Environmental Law and Policy Center, Blue Ridge Environmental Defense League, Nuclear Information and Resource Service, Nuclear Energy Information Service, and Public Citizen in the above captioned proceeding have been served on the following via electronic mail and by deposit in the U.S. mail, first class, on this 12th day of October, 2004.

Office of the Secretary
U.S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications
Staff
Washington, D.C. 20555-0001
(E-mail: HEARINGDOCKET@nrc.gov)

Paul B. Abramson, Chair
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
(E-mail: pba@nrc.gov)

David L. Hetrick
Atomic Safety and Licensing Board Panel
8740 E. Dexter Drive
Tucson, AZ 85715
(E-mail: dlmwh@dakotacom.net)

Anthony J. Baratta
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
(E-mail: AJB5@nrc.gov)

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Ann P. Hodgdon
Antonio Fernandez
Mauri T. Lemoncelli
Robert M. Weisman
Shana Zipkin
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0001
(E-mail: aph@nrc.gov;
axf2@nrc.gov; mtl1@nrc.gov;
rmw@nrc.gov; scz@nrc.gov)

Stephen P. Frantz, Esq.
Paul M. Bessette, Esq.
Alex S. Polonsky, Esq.
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(E-mail: sfrantz@morganlewis.com,
pbessette@morganlewis.com,
apolonsky@morganlewis.com)

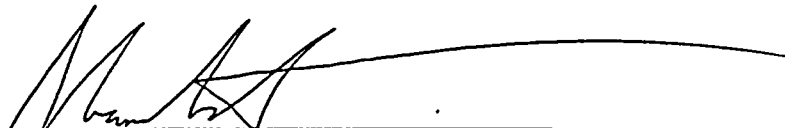
Thomas S. O'Neill, Esq.
Associate General Counsel
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555
(E-mail: thomas.oneill@exeloncorp.com)

Diane Curran, Esq.
Harmon, Curran, Spielberg
& Eisenberg LLP
1726 M. Street N.W., Suite 600
Washington, D.C. 20036
(E-mail: dcurran@harmoncurran.com)

Dave Kraft
Executive Director, Nuclear Energy
Information Service
PO Box 1637
Evanston, IL 60204-1637
(E-mail: neis@neis.org)

Michele Boyd
Legislative Representative, Public Citizen
215 Pennsylvania Avenue, SE
Washington, D.C. 20003
(E-mail: mboyd@citizen.org)

Paul Gunter
Director, Reactor Watchdog Project
Nuclear Information and Resource Service
1424 16th Street, N.W. #404
Washington, D.C. 20036
(E-mail: pgunter@nirs.org)



Shannon Fisk
One of the Attorneys for the
Environmental Law and Policy Center