

RELATED CORRESPONDENCE

January 18, 2005

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION****DOCKETED
USNRC**Before the Atomic Safety and Licensing Board

January 18, 2005 (1:18 pm)

In the Matter of)

ENTERGY NUCLEAR VERMONT)

YANKEE, LLC and ENTERGY)

NUCLEAR OPERATIONS, INC.)

(Vermont Yankee Nuclear Power Station))

Docket No. 50-271

ASLBP No. 04-832-02-OLA

(Operating License Amendment)

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF****ENTERGY'S INITIAL DISCOVERY DISCLOSURES**

Pursuant to 10 C.F.R. § 2.336(a), Applicants Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. ("Entergy") hereby make the following initial discovery disclosures.¹ In accordance with 10 C.F.R. § 2.336(d), Entergy will supplement these disclosures as additional information or documents are developed, obtained or identified.

(a)(1) Identity of Persons That Entergy May Rely Upon as Witnesses

Entergy has not yet determined the persons upon whom it will rely as witnesses with respect to the admitted contentions. Persons currently employed by Entergy, its affiliates, or its contractors upon whose opinions Entergy bases its position on the admitted contentions include the individuals identified below. None of these individuals has yet been asked to provide an analysis responding to the admitted contentions.

¹ These disclosures do not address newly admitted Contention DPS 6. See, Memorandum and Order (Admitting Intervenor's New Contention), dated January 11, 2005. Entergy will address disclosures relating to this new contention at a later date.

CONTENTION DPS 1

<u>Name and Affiliation</u>	<u>Business Address</u>	<u>Telephone Number</u>
Robert J. Wanczyk - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-258-4140
James M. Devincentis - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-258-4236
Len T. Gucwa - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-258-4225
Brian R. Hobbs - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3036
Craig J. Nichols - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3190
James H. Callaghan - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3080

CONTENTION DPS 2

<u>Name and Affiliation</u>	<u>Business Address</u>	<u>Telephone Number</u>
Brian R. Hobbs - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3036
Bruce C. Slifer - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3197
Pedro Perez - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3118
Enrico Betti - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3081
James Rogers - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3032
Liliane Schor -- AREVA	400 Donald Lynch Blvd Marlborough, MA 01752	978-568-2118
Paul Rainey -- Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3038
Edward Madden -- Stone & Webster, Inc.	P O Box 2325 Boston, MA 02107	802-451-3025
Barbara Salter -- Stone & Webster, Inc.	P O Box 2325 Boston, MA 02107	802-451-3188
Craig J. Nichols - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3190

CONTENTION NEC 3

<u>Name and Affiliation</u>	<u>Business Address</u>	<u>Telephone Number</u>
Craig J. Nichols - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3190
Brian R. Hobbs - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3036
George S. Thomas - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3072
Paul Quinn - General Electric	3901 Castle Hayne Road Wilmington, NC 28402	910-675-5000
Rodney Cook - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-258-3027
Christopher Tabone - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-258-4119

CONTENTION NEC 4

<u>Name and Affiliation</u>	<u>Business Address</u>	<u>Telephone Number</u>
George S. Thomas - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3072
Daniel E. Yasi - Stone & Webster, Inc.	100 Technology Center Drive Stoughton, MA 02072-4705	617-589-1120
Scott D. Goodwin - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3085
James Fitzpatrick - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3086
Craig J. Nichols - Entergy	320 Governor Hunt Road P.O. Box 250, Vernon, VT 05354	802-451-3190
Paul Baughman - ABS Consulting	118 Portsmouth Avenue Suite B-202 Stratham, NH 03885	603-778-1144

(a)(2)(i) Documents and Data Compilations

Non-privileged, non-proprietary documents and data compilations relevant to the admitted contentions are being provided to the parties as follows: Six compact disks are being provided to DPS with respect to Contentions DPS 1 and 2. Three compact disks are being

provided to NEC with respect to Contentions NEC 3 and 4. Nine compact disks are being provided to the NRC Staff with respect to Contentions DPS 1 and 2 and NEC 3 and 4.

Documents containing proprietary information will be provided to the parties in separate compact disks upon issuance of a Protective Order by the Board. See Amended Motion for Protective Order, filed January 18, 2005 by Entergy and consented to by all parties.

(a)(2)(ii) Tangible Things

There are no tangible things (e.g., books, or publications relevant to these disclosures.

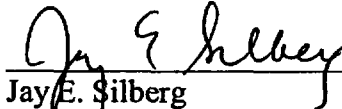
(a)(2)(iii) Publicly Available Documents

All publicly available documents in Entergy's possession or control that are relevant to admitted contentions are being provided under Section (a)(2)(i) above.

(a)(3) Privileged and Protected Documents

Lists of otherwise discoverable documents being withheld on the grounds of privilege and of protected documents containing proprietary information required to be held in confidence are being separately sent to DPS, NEC and the NRC Staff.

Respectfully submitted,



Jay E. Silberg
Matias F. Travieso-Diaz
Douglas J. Rosinski
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Washington, DC 20037-1128
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Counsel for Entergy Nuclear Vermont Yankee,
LLC and Entergy Nuclear Operations, Inc.

Dated: January 18, 2005

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ENTERGY NUCLEAR VERMONT
YANKEE, LLC and ENTERGY
NUCLEAR OPERATIONS, INC.
(Vermont Yankee Nuclear Power Station)

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) Docket No. 50-271
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ASLBP No. 04-832-02-OLA
(Operating License Amendment)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Entergy's Initial Discovery Disclosures" and
"Certification of Entergy's Initial Discovery Disclosures – Affidavit of Craig J. Nichols" were
served on the persons listed below by deposit in the U.S. mail, first class, postage prepaid, and
where indicated by an asterisk by electronic mail, this 18th day of January, 2005.

*Administrative Judge
Alex S. Karlin, Chair
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Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
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ask2@nrc.gov

*Administrative Judge
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*Administrative Judge
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Atomic Safety and Licensing Board
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*Secretary
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Mail Stop O-16 C1
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Matias F. Travieso-Diaz

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ENTERGY NUCLEAR VERMONT)	Docket No. 50-271
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(Vermont Yankee Nuclear Power Station))	(Operating License Amendment)
)	

CERTIFICATION OF ENTERGY'S INITIAL DISCOVERY DISCLOSURES
AFFIDAVIT OF CRAIG J. NICHOLS

County of Windham)
)
State of Vermont)

I, Craig J. Nichols, being duly sworn according to law, depose and state the following:

1. I am the Extended Power Uprate Project Manager for Entergy Nuclear Operations, Inc. My business address is 320 Governor Hunt Road, P.O. Box 250, Vernon, VT 05354. I am authorized to provide this certification, pursuant to 10 C.F.R. § 2.336(c), on behalf of Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. ("Entergy").

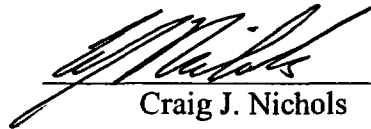
2. As Extended Power Uprate Project Manager I am responsible for the gathering and preparation of all of the analyses and documentation associated with the Extended Power Uprate for Vermont Yankee Nuclear Power Station. In connection with Entergy's initial document disclosures in this proceeding, I have personally overseen the review and classification of all relevant documents and the production of the file compilations being provided by Entergy.

3. To the best of my knowledge, information and belief, Entergy's Initial Discovery Disclosures, dated January 18, 2005, describe and transmit all materials required to be disclosed

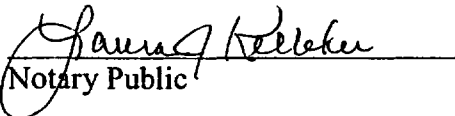
by 10 C.F.R. § 2.336(a) that were identified as relevant to the admitted contentions through a search of the information and documentation reasonably available to and under Entergy's possession, custody, or control.

4. Further, to the best of my knowledge, information, and belief, and based on a review of the information and documentation currently reasonably available to and under the possession, custody, or control of Entergy, these disclosures are accurate and complete as of the date of this certification.

Further, the affiant sayeth not.


Craig J. Nichols

Subscribed and sworn to before me
this 17th day of January, 2005.


Notary Public

My commission expires 2/10/07