RAS 9848

RELATED CORRESPONDENCE

DOCKETED USNRC

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

April 4, 2005 (7:26am)

OFFICE OF SECRETARY RULEMAKINGS AND

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANELADJUDICATIONS STAFF

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)

FOURTH ADDITIONAL DISCLOSURES OF INTERVENORS ENVIRONMENTAL LAW AND POLICY CENTER, BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE, NUCLEAR INFORMATION AND RESOURCE SERVICE, <u>NUCLEAR ENERGY INFORMATION SERVICE, AND PUBLIC CITIZEN</u>

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 may be relevant to the Intervenors' Clean Energy Alternatives Contention that the Licensing Board Panel admitted in its August 6, 2004 Memorandum and Order. This disclosure is an update to Intervenors' prior disclosures in this proceeding.

I. Expert Witness

No additional disclosures.

II. Documents, Data Compilations, and Tangible Things

No additional disclosures.

III. Privilege Log

DATE	AUTHOR	DOCUMENT TYPE DESCRIPTION	RECIPIENT(S)
March 17, 2005	Shannon Fisk	Email and Document Forwarding Exelon's Motion for Summary Disposition with	Bruce Biewald

Template = SECY-035

SECY-02

		comments	
March 17, 2005	Shannon Fisk	Email Regarding Exelon's Motion for Summary Disposition	Howard Learner
March 18, 2005	Howard Learner	Email Regarding strategy for responding to Exelon's Motion	Shannon Fisk
March 18, 2005	Shannon Fisk	Email and Document Draft Motion for Extension of Time to Respond to Exelon's Motion	Howard Learner
March 18, 2005	Shannon Fisk	Email and Document Forwarding Exclon's Motion for Summary Disposition with comments	Meleah Geertsma
March 22, 2005	Howard Learner	Email and Document Final version of Motion for Extension of Time	Shannon Fisk
March 23, 2005	Meleah Geertsma	Email and Document Memo summarizing Exelon's Motion for Summary Disposition	Shannon Fisk
March 23, 2005	Shannon Fisk	Email and Document Forwarding memo summarizing Exelon's Motion	Howard Learner
March 23, 2005	Howard Learner	Email and Document Forwarding memo summarizing Exelon's Motion	Joe Shacter, Meleah Geertsma, and Shannon Fisk
March 24, 2005	Bruce Biewald	Email Requesting information about wind project costs	Shannon Fisk
March 24, 2005	Joe Shacter	Email Regarding land use impacts of wind power	Shannon Fisk
March 24, 2005	Joe Shacter	Email Regarding land use impacts of wind power	Shannon Fisk, Meleah Geertsma, and Charlie Kubert

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March 24, 2005	Bruce Biewald	Email Regarding response to Exelon's Motion	Shannon Fisk, Anna Sommer
March 24, 2005	Shannon Fisk	Email Requesting information about clean energy projects	Barry Matchett, Charlie Kubert, and Howard Learner
March 25, 2005	Barry Matchett	Email Responding to request for information about clean energy projects	Shannon Fisk, Charlie Kubert, and Howard Learner
March 25, 2005	Charlie Kubert	Email Regarding natural gas prices	Shannon Fisk, Barry Matchett
March 25, 2005	Joe Shacter	Email and Document Regarding Exelon's Motion and Hearing Transcript	Shannon Fisk, Barry Matchett
March 27, 2005	Shannon Fisk	Email and Document Draft Motion to Reconsider Denial of Motion for Extension of Time	Howard Learner
March 28, 2005	Howard Learner	Email and Document Final Version of Motion to Reconsider	Shannon Fisk

Dated: April 1, 2005

Respectfully Submitted,

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On Behalf of Petitioner Public Citizen

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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)

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 Intervenors Environmental Law and Policy Center, et al. in the above-captioned docket.

Included with this certification is the additional disclosures required under 10 C.F.R.
336(a) and (d) for the Intervenors 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 are accurate and include all additional relevant materials required by 10 C.F.R. 2.336(a) and (d) to be disclosed as of the date of this certification.

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

Signed on April 1, 2005

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

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

In the Matter of

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Docket No. 52-007-ESP

Exelon Generation Company, LLC

ASLBP No. 04-821-01-ESP

(Early Site Permit for Clinton ESP Site)

CERTIFICATE OF SERVICE

I, Shannon Fisk, hereby certify that copies of the Fourth 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 1st day of April, 2005.

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)

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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

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Shannoh Fisk

One of the Attorneys for the Environmental Law and Policy Center