NEW ENGLAND COALITION, INC.'S (NEC) INITIAL DISCLOSURE PURSUANT TO 10 C.F.R. § 2.336

Pursuant to 10 C.F.R. § 2.336 and the Board’s Memorandum and Order dated September 22, 2006, New England Coalition, Inc. (NEC) hereby makes the following initial disclosure. This disclosure is based on information currently available to NEC and will be supplemented as appropriate.1

I. Witnesses

NEC may rely upon the following persons as witnesses:

A. Dr. Ross Jones
   Environmental Studies Program
   Dartmouth College
   6182 Steele Hall, Room 113
   Hanover, NH 03755
   Tele: 603-646-0261
   Email: ross.t.jones@dartmouth.edu

B. Dr. Joram Hopenfeld
   1724 Yale Place
   Rockville, MD 20850-1116
   Tele: 301-801-7480

II. Documents

1 NEC’s initial disclosure does not include information concerning a few documents in the custody of Raymond Shadis, NEC Staff Technical Advisor, which NEC’s counsel has not yet received. NEC will file a supplemental disclosure of this information as soon as possible.
Documents relevant to NEC’s admitted contentions are as follows. NEC does not separately list, but incorporates by reference, all documents filed in this docket and in the Vermont Yankee EPU docket.

A.  Documents relevant to Contention 1

Treatise


Articles from above Treatise


Connecticut River and the Effects of the Connecticut Yankee Plant.” Pages 155-180 in

Herring and American Shad in the Connecticut River.” Pages 361-377 in Jacobson, P.A.,
Maryland.

and Recruitment in the Connecticut River: A 40-Year Summary.” Pages in 407-417 in
Maryland.

Peer Reviewed Journal Articles


of elevated temperatures on life-history traits of an introduced fish, pumpkinseed

upstream migrant fishes in open-channel flow: a new approach to predicting passage

Leach, S.D. and E.D. Houde. 1999. “Effects of environmental factors on survival,

body and tissue-specific energy use in American shad (Alosa sapidissima).” Can. J.

in an anadromous clupeid, the American shad (Alosa sapidissima).” J. Comp Physiol B


**Thesis and Dissertations**


**Government Scientific Reports**


Reports on Vermont Yankee prepared by or for Entergy


Reports on Vermont Yankee prepared by or for the Vermont Agency of Natural Resources


Data concerning Vermont Yankee collected by or for Entergy


Government Data


B. Documents Relevant to Contentions 2-4


Levich, V.G. *Physicochemical Hydrodynamics*. Prentice- Hall. Inc 1962, Chapter III.


October 23, 2006  New England Coalition

by:  
Ronald A. Shems  
Karen Tyler  
SHEMS DUNKIEL KASSEL & SAUNDERS PLLC  
For the firm  

Attorneys for NEC
<table>
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<tr>
<th>Document Number</th>
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<td>10/12/2006</td>
<td>Hopenfeld</td>
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<td>RJ-42</td>
<td>Email re: NEC/Vermont Yankee - biological report</td>
<td>5/23/2006</td>
<td>Jones, Ross PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems, David Mears; P. Parenteau</td>
<td>None</td>
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<td>5/23/2006</td>
<td>Jones, Ross PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems, David Mears; P. Parenteau</td>
<td>Expert input to attorney work product.</td>
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<td>RJ-44</td>
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<td>5/23/2006</td>
<td>Jones, Ross PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems</td>
<td>None</td>
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<td>5/23/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
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<td>Ronald Shems</td>
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<td>RJ-46</td>
<td>Email re: Environmental Report Attachment</td>
<td>5/21/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems</td>
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<td>RJ-47</td>
<td>Email re: Water Contention reply2.doc</td>
<td>6/29/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems</td>
<td>Expert input to attorney work product.</td>
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<td>RJ-48</td>
<td>Email re: Vermont Yankee/NEC - biology</td>
<td>6/28/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems</td>
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<td>RJ-49</td>
<td>Email re: Vermont Yankee Affidavit</td>
<td>6/27/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
<td>Expert witness for NEC</td>
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<td>Email re: Vermont Yankee/NEC - biology</td>
<td>6/28/2006</td>
<td>Jones, Ross</td>
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<td>RJ-51</td>
<td>Email re: chemical engineer</td>
<td>9/20/2006</td>
<td>Jones, Ross</td>
<td>PhD</td>
<td>Expert witness for NEC</td>
<td>Ronald Shems</td>
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In the matter of
ENTERGY NUCLEAR VERMONT YANKEE, LLC
and ENTERGY NUCLEAR OPERATIONS, INC.
Vermont Yankee Nuclear Power Station

Docket No. 50-271-LR
ASLB No. 06-849-03-LR

DECLARATION OF KAREN TYLER

I, Karen Tyler, being properly sworn, state the following to the best of my personal knowledge:

1. New England Coalition, Inc.'s (NEC) Initial Disclosure Pursuant to 10 C.F.R. § 2.336 includes all relevant materials required by that rule, with the exception of information concerning a few documents in the custody of Raymond Shadis, NEC Staff Technical Advisor, which NEC’s counsel has not yet received. NEC will file a supplemental disclosure including this information as soon as possible. With this exception, NEC’s disclosures are accurate and complete as of October 23, 2006.

DATED at Burlington, Vermont this 23rd day of October, 2006

by:  
Karen Tyler
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of

Entergy Nuclear Vermont Yankee, LLC
and Entergy Nuclear Operations, Inc.
(Vermont Yankee Nuclear Power Station)

Docket No. 50-271-LR
ASLBP No. 06-849-03-LR

CERTIFICATE OF SERVICE

I, Karen Tyler, hereby certify that copies of the NEW ENGLAND COALITION, INC’S
(NEC) INITIAL DISCLOSURE PURSUANT TO 10 C.F.R. § 2.336 in the above-captioned
proceeding were served on the persons listed below, by U.S. Mail, first class, postage prepaid; by
Fed Ex overnight to Judge Elleman; and, where indicated by an e-mail address below, by
electronic mail, on the 23rd day of October, 2006.

Administrative Judge
Alex S. Karlin, Esq., Chair
Atomic Safety and Licensing Board
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: ask2@nrc.gov

Administrative Judge
Dr. Richard E. Wardwell
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: rew@nrc.gov

Administrative Judge
Thomas S. Elleman
Atomic Safety and Licensing Board Panel
5207 Creedmoor Road, #101
Raleigh, NC 27612
E-mail: elleman@eos.ncsu.edu

Office of the Secretary
Attn: Rulemaking and Adjudications Staff
Mail Stop: O-16C1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: hearingdocket@nrc.gov

Office of Commission Appellate Adjudication
Mail Stop: O-16C1
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Washington, DC 20555-0001
E-mail: OCAAdjudication@nrc.gov

Sarah Hofmann, Esq.
Director of Public Advocacy
Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601
E-mail: sarah.hofmann@state.vt.us
for the firm
Attorneys for New England Coalition, Inc.
October 23, 2006

Office of the Secretary
Attn: Rulemaking and Adjudications Staff
Mail Stop O-16C1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: In the Matter of Energy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station), Docket No. 50-271-LR, ASLBP No. 06-849-03-LR

Dear Sir or Madam:

Please find enclosed for filing in the above-stated matter New England Coalition, Inc.'s Initial Disclosure Pursuant to 10 C.F.R. § 2.336.

Thank you for your attention to this matter.

Sincerely,

Karen Tyler
SHEMS DUNKIEL KASSEL & SAUNDERS PLLC

Cc: attached service list
Enclosures (3)