

November 15, 2006

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board

November 15, 2006 (4:13pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In the Matter of	)	
	)	
Entergy Nuclear Generation Company and	)	Docket No. 50-293-LR
Entergy Nuclear Operations, Inc.	)	ASLBP No. 06-848-02-LR
	)	
(Pilgrim Nuclear Power Station)	)	

**ENTERGY'S INITIAL DISCLOSURES**

Pursuant to 10 C.F.R. § 2.336(a), Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. ("Entergy") hereby make the following initial disclosures.

1. Testifying Witnesses

Entergy has not yet identified the persons upon whom it will rely as witnesses with respect to the admitted contentions. In accordance with 10 C.F.R. § 2.336(d), Entergy will supplement this disclosure after testifying witnesses are identified.

2. Documents and Data Compilations

Documents and data compilations that are relevant to Pilgrim Watch Contention 1 and Pilgrim Watch Contention 3, as admitted by the Atomic Safety and Licensing Board and that are not privileged or otherwise subject to protected status, are being provided on compact disks to the Pilgrim Watch and the NRC Staff. Entergy is not, however, providing copies of pleadings and attachments that have been served on the Board and parties in this licensing proceeding.

Attachment 1 provides a description and location of additional documents, or categories of

TEMPLATE = SECY-037

SECY-02

documents, that have been identified by Entergy as relevant to these contentions, but have not yet been provided on compact disks.

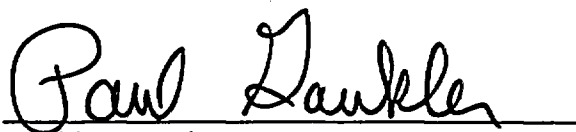
3. Tangible Things

Other than documents provided or listed, no relevant tangible things have been identified.

4. Privilege Log

As set forth in the parties' "Joint Stipulation and Motion on Disclosure" dated November 14, 2006, counsel for the parties have agreed that the privilege logs required by 10 C.F.R. § 2.336(a)(3) and (b)(5) need not identify documents that are subject to the attorney-client or work product privileges. The list of documents to which other privileges would apply or that have protected status because they contain proprietary information, is provided as Attachment 2. With respect to documents containing proprietary information, Entergy is prepared to seek any necessary authorization from other entities to provide copies of proprietary documents to those parties and their representatives executing a mutually acceptable confidentiality agreement, or otherwise disclose such documents pursuant to a protective order.

Respectfully Submitted,



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Paul A. Gaukler  
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Counsel for Entergy Nuclear Generation Company,  
and Entergy Nuclear Operations, Inc.

Dated: November 15, 2006

Attachment 1  
Additional Documents, or Categories and Locations, Relevant to the Admitted Contentions

<u>Document/Category</u>	<u>Location</u>	<u>Relevant Contention</u>
NUREG-1801, Generic Aging Lessons Learned, Rev. 1	<a href="http://www.nrc.gov">www.nrc.gov</a>	PW-1
Safety Guide 23: Onsite Meteorological Programs	<a href="http://www.nrc.gov">www.nrc.gov</a>	PW-1
Reg. Guide 1.145: Atmospheric Dispersion Models for Potential Accident Consequence Assessment at Nuclear Power Plants	<a href="http://www.nrc.gov">www.nrc.gov</a>	PW-3

Attachment 2

Log of Documents Containing Proprietary Information

<b>No.</b>	<b>Document Date</b>	<b>Entity Claiming Proprietary Status</b>	<b>Document Description</b>
1	02/02/1998	KLD Associates/Entergy	KLD Proposal for Revision 5 ETE
2.	08/18/1998	KLD Associates/Entergy	Purchase Order Request for Revision 5 ETE
3.	02/13/1998	KLD Associates/Entergy	Budget Oversight Committee Agenda and Attachments
4.	05/19/1998	KLD Associates/Entergy	Work Order for Revision 5 ETE
5.	01/22/1998	KLD Associates/Entergy	Sole Purchase Order Request for Revision 5 ETE
6.	01/14/1998	KLD Associates/Entergy	Draft Sole Purchase Order Request for Revision 5 ETE
7	02/03/2003	KLD Associates/Entergy	Contract Request for Revision 6 ETE with Attachments.
8	02/19/2003	KLD Associates/Entergy	KLD Draft Proposal for Revision 6 ETE
9.	08/16/2004	KLD Associates/Entergy	KLD Invoice and Progress Report
10.	08/17/2004	KLD Associates/Entergy	KLD Facsimile with Invoices and Progress Reports
11	01/27/2004	KLD Associates/Entergy	KLD Draft Scope of Work and Proposal for Revision 6 ETE
12	12/01/2004	KLD Associates/Entergy	KLD Invoices

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	)	
(Pilgrim Nuclear Power Station)	)	

**CERTIFICATE OF SERVICE**

I hereby certify that copies of "Entergy's Initial Disclosures" dated November 15, 2006, and Certification of Initial Disclosure Affidavit of Fred Mogolesko executed November 13, 2006, 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 15th day of November, 2006.

\*Administrative Judge  
Ann Marshall Young, Esq., Chair  
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Paul A. Gaukler

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	)	
(Pilgrim Nuclear Power Station)	)	

**Certification of Initial Disclosure  
Affidavit of Fred Mogolesko**

County of Plymouth	)
	)
State of Massachusetts	)

I, Fred Mogolesko, being duly sworn, state:

I am the License Renewal Project Manager for the Pilgrim Nuclear Power Station. My business address is Pilgrim Nuclear Station, 600 Rocky Hill Road, Plymouth, MA 02360. I am authorized to provide this certification, pursuant to 10 C.F.R. § 2.336(c), on behalf of Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. ("Entergy").

To the best of my knowledge, information and belief, the initial disclosures in the above captioned proceeding contain 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 Entergy.

Further, to the best of my knowledge, information and belief, and based on representations of personnel who were instructed to perform a diligent search, these disclosures are accurate and complete as of this date.

Further the affiant sayeth not.

Fred Mogolesko  
Fred Mogolesko

Subscribed and sworn to before me this 13<sup>th</sup> day of November, 2006

Judith M. Plummer  
Notary Public

My commission expires: 12/26/2008

