

March 31, 2008

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board Panel

DOCKETED
USNRC

April 1, 2008 (7:30am)

In the Matter of)
)
Entergy Nuclear Generation Company and)
Entergy Nuclear Operations, Inc.)
)
(Pilgrim Nuclear Power Station))

Docket No. 50-293-LR
ASLBP No. 06-848-02-LR

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**ENTERGY'S RESPONSE IN OPPOSITION TO
PILGRIM WATCH MOTION TO PERMIT LATE FILED EXHIBITS**

Pursuant to 10 C.F.R § 2.323(c), Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. (collectively, "Entergy") hereby file their opposition to "Pilgrim Watch's Motion to Permit Late Filed Exhibits" ("Motion"), filed on March 24, 2008. The Motion is inexcusably untimely, having been filed almost two months after Pilgrim Watch's testimony and exhibits. Moreover, it is highly prejudicial to Entergy (and the NRC Staff) because it has denied them the opportunity to address the late filed exhibits in their testimony. Additionally, wholly apart from being late-filed, the exhibits are inadmissible for a variety of reasons, discussed below. Furthermore, Pilgrim Watch failed to consult with counsel for Entergy as required under 10 C.F.R. § 2.323(b) prior to filing its Motion.

I. BACKGROUND

The December 20, 2006 Order of the Atomic Safety and Licensing Board ("Board") provided that the parties file their statements of position, written direct testimony and exhibits under 10 C.F.R. § 2.1207(a)(1) on December 3, 2007.¹ The Board

¹ Order (Establishing Schedule for Proceeding and Addressing Related Matters) (December 20, 2006) ("Initial Board Order") at 7.

further explained the relationship between the filing of the statement of position, written direct testimony and exhibits as follows:

In filing statements of position, testimony and exhibits, the parties (and other participants, as applicable), should bear in mind the following considerations: A statement of position should be in the nature of a trial brief, or summary of a participant's position on matters at issue, that provides a precise "road map" of the party/participant's case, setting out affirmative arguments and any applicable legal standards, identifying witnesses and evidence, and specifying the purpose of witnesses and evidence (stating with particularity how the witness, exhibit, or other evidence supports a factual or legal position). The written testimony shall be under oath or supported by an affidavit. The exhibits shall include all documents that the party or its witnesses refer to, use, or rely upon for their statements of position.²

The Board's December 19, 2007 Order changed the date for the filing of the initial statement of position, testimony and exhibits for Pilgrim Watch and the Staff to January 29, 2008 and the filing of rebuttal testimony and exhibits for all parties to March 3, 2008.³ The Board also emphasized that:

The opportunity to submit rebuttal is NOT an opportunity to present material unrelated to the explicit prefiled direct testimony being rebutted, nor is it an opportunity to raise additional matters or testimony to supplement its initial prefiled direct testimony.⁴

Pursuant to the Board's Orders and 10 C.F.R. § 2.1207(a)(1), Pilgrim Watch filed its statement of position, testimony and exhibits on January 29, 2008.⁵

On February 21, 2008, the Board issued an order that in part directed Pilgrim Watch to "provide specific citations to the testimony of its (or any other party's) experts and to exhibits, as relevant, for each of the statements made in its Statement of Position

² Id. at 8 (emphasis added).

³ Order (Revising Schedule for Evidentiary Hearing and Responding to Pilgrim Watch's December 14 and 15 Motions) ("Dec. 19 Order") at 3.

⁴ Id. at n.3 (emphasis added)

⁵ Pilgrim Watch Presents Statements of Position, Direct Testimony and Exhibits Under 10 CFR 2.1207 (Jan. 29, 2008) ("Statement of Position").

of January 29, 2008, and in any additional statements” in and/or with its rebuttal testimony.⁶ In a series of e-mails responding to Pilgrim Watch’s persistent ex parte communications,⁷ the law clerk for the Board provided Pilgrim Watch guidance on the submittal of exhibits and statements of position. In his e-mail of February 22, 2008, Mr. Kahn advised Pilgrim Watch that:

Because any statement made in a ‘Statement of Position’ is not itself considered to be evidence, you must, for each statement, provide ("cite") a specific reference to (a) specific page(s) or paragraph(s) of something that is evidence -- i.e., citations (references) to specific parts of expert testimony/affidavits, or other documents provided as exhibits, that the Board can look to in order to see what evidence supports each statement of position.

And in his e-mail of February 25, 2008, Mr. Kahn advised Pilgrim Watch that:

[I]f there are any technical documents, or portions thereof, that you wish the Board to consider as evidence in making their decision, then you should provide copies of each document, and/or the portions thereof that you rely on, to the Board and all parties, and mark them with exhibit numbers. This is because all exhibits considered as evidence must be made part of the record in the case, so that, for example, if the case were appealed to court by any party, all the evidence would be there for the reviewing court to read.⁸

On March 3, 2008, Pilgrim Watch filed its revised statement of position as directed by the Board’s February 21 Order.⁹ At the same time, Pilgrim Watch filed 16 new, additional exhibits that had not been included with its January 29, 2008 initial submittal. On March 6, 2008, Pilgrim Watch filed its rebuttal

⁶ Order and Notice (Regarding Hearing, Limited Appearance Session, and Additional Questions for Parties) (“Feb. 21 Order”) at 2.

⁷ February 22, 2008 email to Mary Lampert from Zachary Kahn (“Feb. 22 Email”); February 25, 2008 email to Mary Lampert from Zachary Kahn (“Feb. 25 Email”); February 26, 2008 Email to Mary Lampert from Zachary Kahn (“Feb. 26 Email”).

⁸ Feb. 25 E-mail (emphasis added).

⁹ Pilgrim watch Presents Statements of Position, Direct Testimony and Exhibits Under 10 CFR 2.1207 [Modified Per Request ASLB Order of February 21, 2008, section c, page 2] (March 3, 2008) (“Revised Statement of Position”).

statement of position and additional testimony but filed no new additional exhibits.¹⁰

On March 24, 2008, Pilgrim Watch filed its instant Motion requesting the Board to allow the introduction of more than 25 late-filed exhibits into the record.

II. ARGUMENT

A. The Request to Late File Exhibits is Untimely and Highly Prejudicial

1. Pilgrim Watch's Exhibits Are Clearly Untimely

Pilgrim Watch's exhibits are untimely and should not be permitted by the Board. The regulations are clear: "[I]nitial written statements of position and written testimony with supporting affidavits on the admitted contentions . . . must be filed on the dates set by the presiding officer." 10 C.F.R. § 2.1207(a)(1). In this respect, the Board's Initial Order expressly provided for the "[s]imultaneous filing of statements of position, written direct testimony and exhibits under 10 C.F.R. § 2.1207(a)(1)," more than two months in advance of the then scheduled date for the hearing.¹¹ The Order as quoted above furthermore made clear that the pre-filed "exhibits shall include all documents that the party or its witnesses refer to, use, or rely upon" for their position.¹² While the Board's December 19 Order changed the date of this filing, the Order left unaltered the Board's requirement for a party to file all exhibits, without exception, upon which a party relies as part of the party's pre-filed written testimony.

¹⁰ Pilgrim Watch's Rebuttal Directed to Entergy's Initial Statement of Position on Pilgrim Watch Contention 1, January 8, 2008 and NRC Staff Initial Statement of Position – Contention 1, January 29, 2008 (Mar. 6, 2008) ("PW Rebuttal Statement of Position").

¹¹ Initial Board Order at 7 (emphasis added).

¹² Id. at 8

Thus, the late filed exhibits are inexcusably untimely since Pilgrim Watch did not file them according to the Board's orders. Moreover, the Board's law clerk expressly advised Pilgrim Watch on the need to provide as pre-filed exhibits any document that Pilgrim Watch wished "the Board to consider as evidence in making their decision" and to "provide copies of each document, and/or the portions thereof that you rely on, to the Board and all parties, and mark them with exhibit numbers." Pursuant to the Board's February 21 Order and subsequent communications with the Board's law clerk, Pilgrim Watch has already filed along with its revised statement of position numerous additional exhibits beyond those filed with its initial submittal.¹³ Given that the Board has allowed Pilgrim Watch many opportunities for the filing of exhibits, the Board should not permit the continued late filing of exhibits.

2. *Pro Se* Intervenor Are Obligated to Meet NRC and Board Rules and Deadlines

Pilgrim Watch's claim that it should be excused from meeting clearly established Board deadlines because it is a *pro se* intervenor is not a valid reason to permit the late filed exhibits. It is well established that *pro se* intervenors have the same obligation as represented parties to adhere to Board set deadlines. Entergy Nuclear Vermont Yankee L.L.C. (Vermont Yankee Nuclear Power Station), 2006 NRC LEXIS 72, at *9 (NRC ASLB Mar. 24, 2006).¹⁴ In Vermont Yankee, the intervenor did not adhere to a briefing deadline, already extended by the board, and requested a further extension to file its brief. In denying the intervenor a further extension of the deadline, the board said that its order

¹³ See Pilgrim Watch's Revised Statement of Position and Exhibits.

¹⁴ See e.g., USEC, Inc., LBP-05-28, 62 N.R.C. 585, 593 n.8 (2005); Public Service Electric and Gas Co. (Salem Nuclear Generating Station, Units 1 and 2), ALAB-136, 6 A.E.C. 487, 489 (1973); PPL Susquehanna LLC (Susquehanna Steam Electric Station, Units 1 and 2), LBP-07-10, 66 N.R.C. 1, 21 (2007); Shieldalloy Metallurgical Corp. (Licensing Amendment Request for Decommissioning of the Newfield, New Jersey Facility), LBP-07-5, 65 N.R.C. 341, 352 (2007)

was “clearly stated,” and that the excuse provided by the intervenor did not “meet the Commission’s ‘unavoidable and extreme circumstances’ standard for granting an extension of time.” Id. at *9.¹⁵

Pilgrim Watch should be held to the same standard as a represented party. The Board’s scheduling orders are clear and the deadlines set for the statements of position and supporting testimony and exhibits were unambiguous. The Board’s scheduling order clearly required Pilgrim Watch’s initial filing of exhibits to “include all documents that the party or its witnesses refer to, use, or rely upon for their statements of position.”¹⁶ Pilgrim Watch’s representative, Ms. Lampert, did not need to be a lawyer to understand this express direction. Further, this requirement was reinforced by the informal communications of the Board’s law clerk. Thus, similar to the *pro se* intervenor in Vermont Yankee, Pilgrim Watch hopes to ignore the deadlines set forth in three Board orders. As reflected by Vermont Yankee, such is not permitted under the Commission’s rules of practice.

Furthermore, Pilgrim Watch’s claim that it was confused in the interpretation of 10 C.F.R § 2.1207 and misunderstood the proper use of Entergy’s Disclosures¹⁷ rings hollow. Pilgrim Watch’s representative, Ms. Lampert, has skillfully navigated many other procedural and evidentiary rules throughout this proceeding. For example, Ms. Lampert was able to cite Rule 408 in the Rules of Evidence¹⁸ in Pilgrim Watch’s

¹⁵ See Statement of Policy on Conduct of Adjudicatory Proceedings, CLI-98-12, 48 N.R.C. 18, 21 (1998), 63 Fed. Reg 41,872, 41,874 (Aug. 5, 1998).

¹⁶ Initial Board Order at 8 (emphasis added).

¹⁷ Motion at 1.

¹⁸ Fed R. Evid. 408 (2007).

December 15 motion for admission of materials used in settlement discussions.¹⁹ This suggests that Pilgrim Watch is quite capable of consulting with attorneys when it suits its interests,²⁰ and this Board should not permit Pilgrim Watch to use its *pro se* status as a shield in this proceeding. Furthermore, nothing in the NRC's regulations or the Board's orders suggests that Entergy's disclosures could, *ipso facto*, be used in the hearing as evidence absent identification and introduction as an exhibit. To the contrary, the Board's orders and communications of the Board's law clerk clearly reflect that all documents relied upon by a party are to be provided to the Board and the parties as pre-filed exhibits, which Pilgrim Watch failed to do.²¹

3. The Late Filed Exhibits Are Highly Prejudicial

Pilgrim Watch's Motion should also be denied because it is highly prejudicial. Pilgrim Watch argues that "all the Exhibits that [Pilgrim Watch] request[s] to file are from Entergy's Disclosures; and being so, there is no prejudice to Entergy since they are their own documents."²² Such an argument completely ignores the purpose of exhibits as part of the testimony and statement of position. The statement of position, according to the Board, is to be a

"summary of a participant's position on matters at issue, that provides a precise 'road map' of the party/participant's case, setting out affirmative arguments and any applicable legal standards, identifying witnesses and evidence, and specifying the purpose of witnesses and evidence (stating with particularity how the witness, exhibit, or other evidence supports a factual or legal position)."

¹⁹ Pilgrim Watch's Motion Regarding Admissibility of Factual Evidence (Dec. 15, 2007)

²⁰ Indeed, Ms. Lampert's husband is a partner with WilmerHale.

²¹ As noted in Entergy's motion in limine, statements by Pilgrim Watch's witness Arnold Gundersen suggest that Pilgrim Watch and its witnesses had never previously reviewed Entergy's disclosures. See Entergy's Motion in Limine to Exclude Pilgrim Watch Testimony and Exhibits (Mar. 10, 2008) at 33-34. This suggests that the instant motion is not caused by confusion over NRC requirements and practice but by a failure of Pilgrim Watch and its witnesses to previously review Entergy's extensive disclosures.

²² Motion at 2.

Initial Board Order at 8 (emphasis added). Since Pilgrim Watch ignored its obligations under the NRC rules to disclose the bases for its witnesses' opinions, and provided virtually no discussion of Entergy's aging management programs in response to the prior summary disposition motion, the initial filing of testimony, exhibits and the statement of position was in essence the only opportunity that Entergy and the NRC Staff had to identify and respond to the bases for Pilgrim Watch's claims.

As such, the late filed exhibits are highly prejudicial because Entergy (and the Staff) have not had a chance to prepare rebuttal testimony in response to the new exhibits which have been provided at this eleventh hour. Moreover, being filed wholly separate from Pilgrim Watch's statement of position and witness testimony, neither the Board nor the parties have the "precise 'roadmap'" of how these exhibits allegedly support Pilgrim Watch's legal and factual position as intended by the Board in its Initial Scheduling Order. Accepting these exhibits at this late hour would therefore clutter the record with vague and ambiguous implications to which no meaningful opportunity to respond has been made available. Accordingly, allowing the late filed exhibits is exceptionally prejudicial to Entergy (and the Staff), particularly considering the short time of the filing of Pilgrim Watch's Motion prior to hearing. Due process and fairness requires more and the Motion must therefore be denied.²³

B. The Late Filed Exhibits Are Inadmissible in Their Own Right

Wholly apart from being late filed, Pilgrim Watch's late filed exhibits are inadmissible in their own right because they (1) are unsponsored by any testifying expert, (2) are either draft or partial documents and/or have often been marked on and altered by

²³ If the Board were to grant the Motion, fairness dictates that, at a minimum, Entergy be allowed to present oral testimony at the hearing in response to these late filed exhibits.

Pilgrim Watch, or (3) in many instances do not concern buried pipes containing radioactive water subject to aging management to which the Contention 1 is limited. The table included at Attachment 1 to this response identifies for each exhibit the additional grounds why each exhibit is inadmissible wholly apart from being late-filed.

1. Unsponsored Exhibits Must be Excluded from The Record

None of Pilgrim Watch's late filed exhibits are relied on or sponsored by Pilgrim Watch's testifying witnesses. Consequently, they are not admissible evidence and should be excluded from the record. See Duke Power Co. (William B. McGuire Nuclear Station, Units 1 and 2), ALAB-669, 15 N.R.C. 453, 477 (1982) (excluding exhibits not sponsored by an expert "who can be examined on the reliability of the factual assertions and soundness of the scientific opinions found in the documents").

Pilgrim Watch Exhibit 52A, which includes excerpts from Pilgrim Nuclear Power Station Chemistry Corporate Assessment, is a prime example of why unsponsored exhibits should be excluded. Neither of Pilgrim Watch's witnesses attempted to relate that data and information contained in these documents to their testimony. Pilgrim Watch proffered the late filed exhibits, but provides no explanation as to how they relate to the PNPS aging management programs. Without such an explanation, the late filed exhibits cannot assist the Board to determine a fact in issue. To the contrary, the Board and the parties are left with numerous exhibits with vague and ambiguous implications for which no expert explanation of relevance is provided. This fails to provide the "precise 'roadmap'" mandated by the Board's Initial Scheduling order. By longstanding Commission rules of practice and precedent, Pilgrim Watch's late filed exhibits not

sponsored by either of its testifying witnesses must therefore be excluded from the record.

2. Drafts, Partial Documents and Altered Documents Are Inadmissible

Many of the late filed exhibits are either draft or partial documents and moreover many of the documents contain comments or other markings provided by Pilgrim Watch. Draft documents are unreliable and not probative of the final aging management program put in place. Indeed, absent any sponsoring testimony, there is no foundation to establish the accuracy and reliability of such documents. Similarly, partial documents are unreliable and not probative. Partial documents reveal only part of the story and fail to put information in proper perspective. And certainly, the comments and markings made by Pilgrim Watch on the documents do not constitute admissible evidence.

Pilgrim Watch's proffer of draft and partial documents is unjustified because Entergy's provided as part of its disclosures the final, current versions of each of these documents.²⁴ For example, Pilgrim Watch's exhibits 33, 34, 42, and 43 are partial drafts of the aging management review for the salt service water system. Entergy has, however, provided to both Pilgrim Watch and the Staff the complete signed documents for both version 1 (the current version) and version 0 of the aging management review for the salt service water system. Similarly, Pilgrim Watch's exhibits 27, 28, and 30 are partial drafts of the aging management review for the standby gas treatment system. Again, Entergy provided Pilgrim Watch and the Staff with the complete signed document for

²⁴ Because the NRC rules require disclosure of all documents relevant to the admitted contentions (10 C.F.R. § 2/336(a)(2)), Entergy's disclosures provided draft documents and partial documents that it obtained based on a reasonable search of individuals' files. Entergy also provided the complete and final versions of these documents. That Entergy's disclosures included some partial documents that individuals had in their files does not excuse Pilgrim Watch from proffering as its exhibits the complete and accurate copies of the documents that Pilgrim Watch wishes to use.

version 1 (the current version) of the aging management review for the standby gas treatment system. Likewise, Pilgrim Watch exhibit 32 is a partial draft of the aging management review for the condensate storage system. Entergy provided Pilgrim Watch and the Staff with the complete signed document for version 0 (the current version) of the aging management review for the condensate storage system.

As such, virtually all of Pilgrim Watch's late-filed exhibits are also inadmissible because they are either partial documents and/or drafts of the final, current versions of plant documents, and/or because they contain Pilgrim Watch markings and comments that are not evidence. See Table at Attachment 1.

3. Irrelevant Exhibits are Inadmissible

Many of Pilgrim Watch's late filed exhibits are also inadmissible because they do not concern buried pipes containing radioactive water subject to license renewal aging management. As such, they are beyond the scope of Contention 1 and are inadmissible because they are not relevant to the issues subject to hearing in this license renewal proceeding. For example, most of the condition reports for the salt service water system referenced by Pilgrim Watch (exhibits 36-39) do not concern the buried piping portion of the salt service water system. See Table at Attachment 1. Similarly, many other of Pilgrim Watch's late filed do not concern buried pipes containing radioactive water subject to license renewal aging management and, as such, are irrelevant and beyond the scope of this license renewal proceeding. Id.

C. Pilgrim Watch Failed to Consult Prior to Filing Its Motion

Under 10 C.F.R. § 2.323(b), “[a] motion must be rejected if it does not include a certification by the attorney or representative of the moving party that the movant has

made a sincere effort to contact other parties in the proceeding and resolve the issue(s) raised in the motion, and that the movant's efforts to resolve the issue(s) have been unsuccessful." Pilgrim Watch did not consult with Entergy and provides no certification in its Motion. This failure also warrants denial of the Motion.

III. CONCLUSION

For the foregoing reasons, the Board should deny Pilgrim Watch's Motion to late file exhibits.

Respectfully Submitted,



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Dated: March 31, 2008

ATTACHMENT 1
Table of Pilgrim Watch Late Filed Exhibits

Exhibit	Further Reason for Inadmissibility				
	Un-sponsored by witness	Partial Document	Draft	Altered by PW	Irrelevant
27	X	X	X		Standby gas treatment system is beyond the scope of the contention.
28	X	X	X		Standby gas treatment system is beyond the scope of the contention.
29	X			X	Standby gas treatment system is beyond the scope of the contention.
30	X	X	X	X	Standby gas treatment system is beyond the scope of the contention.
31	X	X	X	X	
32	X	X	X	X	
33	X	X	X		
34	X		X	X	
35	X	X		X	
36	X	X		X	Document does not discuss in scope buried piping.
37	X	X		X	Document does not discuss in scope buried piping.
38	X	X		X	Document does not discuss in scope buried piping.
39	X	X			Document does not discuss in scope buried piping.
40	X	X			
41	X	X	X	X	
42	X	X	X		
43	X	X	X	X	
44	X			X	Document discusses fire protection system.
45	X			X	
46	X		X	X	Document discusses portions of a draft aging management program that were not incorporated into the final aging management program.
47	X	X	X		
48	X			X	Document concerns current licensing basis, not aging management program. (See Entergy's Motion in Limine at pg. 38.)
49	X			X	Concerns monitoring for radioactivity, not loss of function.
50	X	X			
51	X	X			
52A	X	X			
52B	X				
52C	X			X	Document discusses water chemistry for the reactor and feedwater and does not discuss condensate storage system or salt-service water buried piping.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Entergy's Response In Opposition To Pilgrim Watch Motion To Permit Late Filed Exhibits," dated March 31, 2008, 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 31st day of March, 2008.

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