

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

_____	)	
In the Matter of	)	Docket Nos. 52-017
Virginia Electric and Power Company	)	
d/b/a Dominion Virginia Power and	)	ASLBP No. 08-863-01-COL
Old Dominion Electric Cooperative	)	
North Anna Unit 3	)	October 1, 2008
Combined License	)	
_____	)	

**INTERVENOR’S FIRST GENERAL DISCOVERY DISCLOSURE**

Pursuant to 10 C.F.R. § 2.336, the Blue Ridge Environmental Defense League with its chapter Peoples Alliance for Clean Energy (“Intervenor”) hereby submits its first general discovery disclosure. This disclosure is based on information currently available to the Intervenor and will be updated per the agreement of the parties.

DOCUMENTS RELEVANT TO CONTENTION ONE:

1) Radioactive Waste: Answers to Questions Related to the Proposed Ward Valley Low-Level Radioactive Waste Disposal Facility, Gary L. Jones, Associate Director Energy, Resources and Science Issues, General Accounting Office to Sen. Boxer and Rep. Miller, May 22, 1998.

A copy of this document is appended to this document as Attachment 1.

WITNESSES RELEVANT TO CONTENTION ONE:

1) Ms. Diane D’Arrigo, Nuclear Information and Resource Service, 6930 Carroll Ave., Takoma Park, Maryland 20912, (301) 270-6477, E-mail: dianed@nirs.org

At this time, Intervenor has not selected any additional witnesses. In accordance

with 10 C.F.R. § 2.336, Intervenor will identify additional witnesses in supplemental disclosures.

At this time, no other tangible things have been identified. Intervenor will provide supplemental disclosures in accordance with 10 C.F.R. § 2.336.

Respectfully submitted,

A handwritten signature in black ink that reads "Louis A. Zeller". The signature is written in a cursive style and is followed by a horizontal line.

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October 1, 2008

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_____	)	

**DECLARATION OF LOUIS A. ZELLER  
PURSUANT TO 10 C.F.R. § 2.336(c)**

Under penalty of perjury, I, Louis A. Zeller, certify that to the best of my knowledge and belief, Intervenor's First General Discovery Disclosure includes all relevant materials required by 10 C.F.R. § 2.336 and that the disclosures are accurate and complete as of the date of this certification.



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**CERTIFICATE OF SERVICE**

**I hereby certify that copies of the October 1, 2008  
INTERVENOR'S FIRST GENERAL DISCOVERY DISCLOSURE**

was served on the following persons via Electronic Information Exchange this 1<sup>st</sup> day of October, 2008.

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Signed in Glendale Springs,  
this day, October 1, 2008

A handwritten signature in black ink that reads "Louis A. Zeller". The signature is written in a cursive style and is followed by a horizontal line.

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