

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

**ATOMIC SAFETY AND LICENSING BOARD PANEL
BEFORE THE LICENSING BOARD**

In the Matter of)	
)	
Tennessee Valley Authority)	Docket Nos. 52-014, 52-015
)	
Bellefonte Nuclear Power Plant)	ASLBP No. 08-864-02-COL-BD01
Units 3 and 4)	October 29, 2008
)	

INTERVENORS' FIRST GENERAL DISCOVERY DISCLOSURE

Pursuant to 10 C.F.R. § 2.336 and in accordance with the Atomic Safety and Licensing Board's order of September 12, 2008, the Blue Ridge Environmental Defense League and its chapter Bellefonte Efficiency and Sustainability Team and the Southern Alliance for Clean Energy ("Intervenors") hereby submit their first general discovery disclosure. This disclosure is based on information currently available to the Intervenors and will be updated per the agreement of the parties.

Intervenors may rely on the following expert witnesses:

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DOCUMENTS RELEVANT TO CONTENTION NEPA-B:
IMPACTS ON AQUATIC RESOURCES INCLUDING FISH, BENTHIC
INVERTEBRATES, AND GENERAL AQUATIC COMMUNITY STRUCTURE OF
THE PROJECT AREA AND GUNTERSVILLE RESERVOIR

Angermeier, P.L. (1995) *Ecological Attributes of Extinction-Prone Species: Loss of Freshwater Fishes of Virginia*, Conservation Biology, (Vol. 9 No. 1), pp. 143-158

Bain, K.B. and Bain, J.L. (1982) *Habitat Suitability Index Models: Coastal Stocks of Striped Bass*, United States Fish and Wildlife Service, Office of Biological Services, (FWS/OBS-82/10.1) Washington, DC, 29 pp.

Edwards, E.A., Gebhart, G. and Maughan, O.E. (1983) *Habitat Suitability Information: Smallmouth Bass*, U.S. Department of the Interior, Fish and Wildlife Service (FWS/OBS-82/10.36) Washington, DC, 47 pp.

Fay, C.W., Neves, R.J. and Pardue, G.B. (1983) *Species Profiles: life histories and environmental requirements of coastal fishes and invertebrates (Mid-Atlantic)—striped bass*, United States Fish and Wildlife Service, Division of Biological Services, (FWS/OBS-82/11.8) U.S. Army Corps of Engineers, TR EL-82-4, 36 pp.

Hubert, W.A., Anderson, S.H., Southall, P.D. and Crance, J.H. (1984) *Habitat suitability models and instream flow suitability curves: Paddlefish*, United States Fish and Wildlife Service, (FWS/OBS-82/10.80), 32 pp.

Starnes and Bogans 1988. *document unavailable at this time*

Master, L.L., Flack, S.R. and Stein, B.A., (1998) *Rivers of Life: Critical Watersheds for Protecting Freshwater Biodiversity*, The Nature Conservancy, Arlington, Virginia (ISBN: 1-886765-09-X), 71 pp.

McMahon, T.E. (1982) *Habitat suitability index models: Creek chub*, U.S. Department of the Interior, Fish and Wildlife Service, (FWS/OBS-82/10.4) 23 pp.

Hampson et al. (2000). *document unavailable at this time, website is listed*

Stuber, R.J., Gebhart, G. and Maughan, O.E., (1982) *Habitat suitability index models: Largemouth bass*, U.S. Department of the Interior, Fish and Wildlife Service, (FWS/OBS-82/10.16) 32 pp.

Vaughn, C.C., (1997) *Regional patterns of mussel distributions in North American rivers*, *Ecography* 20:107-115, (ISSN 0906-7590), Copenhagen

Wiltz, J.W. (1983) *Vogtle Electric Generating Plant Savannah River Larval Fish Study, Burke County, Georgia from January through August, 1974*, Operating License Stage Environmental Report Technical Document, Georgia Power Company, 33 pp.

DOCUMENTS RELEVANT TO CONTENTION FSAR-D AND NEPA G:
SO-CALLED LOW LEVEL RADIOACTIVE WASTE

U.S. General Accounting Office (1998) *Radioactive Waste: Answers to Questions Related to the Proposed Ward Valley Low-Level Radioactive Waste Disposal Facility* (GAO/RCED-98-40R Questions on Ward Valley, B-278691), Washington, DC, May 22, 1998, Jones, G.L.

DOCUMENTS RELEVANT TO CONTENTION NEPA-N:
ENVIRONMENTAL REPORT'S INADEQUATE COST ESTIMATES AND COST
COMPARISONS

Steven D. Scroggs, (October 16, 2007) *Direct Testimony before the Florida Public Service Commission*, Florida Power & Light Company, Docket No. 07____-EI Document number 09467-07, Exhibit SDS-8, <http://www.psc.state.fl.us/library/filings/07/09467-07/09467-07.pdf>

Nuclear Power Joint Fact-Finding, (June 2007) The Keystone Center, Keystone, Colorado, [http://www.keystone.org/spp/documents/FinalReport_NJFF6_12_2007\(1\).pdf](http://www.keystone.org/spp/documents/FinalReport_NJFF6_12_2007(1).pdf)

“Weighted-Average Price of U. S. and Foreign-Origin Uranium Purchased by Owners and Operators of U. S. Civilian Nuclear Power Reactors, 1994-2007 Deliveries,” (May 19, 2008) US Department of Energy—Energy Information Agency,. On the Internet at <http://www.eia.doe.gov/cneaf/nuclear/umar/summaryfig2.html>

Zavadil, R. et al, (2006) *Final Report - 2006 Minnesota Wind Integration Study, Volume I*, EnerNex Corporation for the Minnesota Public Utilities Commission, November 30, 2006) Knoxville, Tennessee, http://www.puc.state.mn.us/docs/windrpt_vol%201.pdf

“DOE Selects 13 Solar Energy Projects for up to \$168 Million in Funding” (March 8, 2007). On the Internet at <http://www.energy.gov/news/4855.htm>

Assessment of Potential Impact of Concentrating Solar Power on Electricity Generation, DOE-GO-102007-2400, February 2007, p. iv

Competitive Renewable Energy Zones (CREZ) Transmission Optimization Study: Attachment A, ERCOT (April 2, 2008).

At this time, Intervenor have 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 29, 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, Intervenors' 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 Intervenor's First General Discovery Disclosure was served this day on the following persons via Electronic Information Exchange.

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