

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 52-016

Calvert Cliffs-3 Nuclear Power Plant
Combined Construction and License Application

JOINT INTERVENORS INITIAL DISCLOSURES

Pursuant to 10 CFR 2.336, the Discovery Disclosure Agreement dated April 7, 2009 and the ASLB order of April 22, 2009, Joint Intervenors make the following initial disclosures.

Contention 1

Testifying Witnesses: Joint Intervenors have not yet identified the person(s) upon whom they will rely as witnesses for this contention. In accordance with 10 CFR 2.336, Joint Intervenors will supplement this disclosure once witnesses are identified.

Documents: Joint Intervenors refer to the documents cited in our Petition to Intervene (November 19, 2009) and Response Petition (December 22, 2009) in this proceeding. One additional document has been identified. It is an article from Energy and Environment Daily, dated April 27, 2009, titled “*NUCLEAR POWER: A key energy industry nervously awaits its 'rebirth'*” and is available upon request.

In addition, Joint Intervenors refer to Case No. 9127 before the Maryland Public Service Commission at <http://webapp.psc.state.md.us>, in particular the direct testimony of Michael J. Wallace and George Vanderheyden (available at Number 21). We also refer to Number 63 in that docket: “CRC Salomon - Stenographer's Record. Hearing Date: August 11, 2008 (Public Hearing) Case No. 9127” although Joint Intervenors do not currently have this document in our possession.

We expect that documents related to Case No. 9173 before the Maryland Public Service Commission will be used by Joint Intervenors. However, we have not yet conducted a review of these documents.

In accordance with 10 CFR 2.336, the Discovery Disclosure Agreement dated April 7, 2009, and the ASLB order of April 22, 2009, Joint Intervenors will supplement this disclosure monthly as additional documents are identified.

Contention 2

Testifying Witnesses: Joint Intervenors have not yet identified the person(s) upon whom they will rely as witnesses for this contention. In accordance with 10 CFR 2.336, Joint Intervenors will supplement this disclosure once witnesses are identified. We note further activity on this contention depends on the outcome of the legal arguments scheduled for briefing on May 15.

Documents: Joint Intervenors refer to the documents cited in our Petition to Intervene and Response Petition in this proceeding. Joint Intervenors have no additional documents to disclose related to this contention at this time.

In accordance with 10 CFR 2.336, the Discovery Disclosure Agreement dated April 7, 2009, and the ASLB order of April 22, 2009, Joint Intervenors will supplement this disclosure monthly as additional documents are identified.

Contention 7

Testifying Witnesses: As stated in our original Petition to Intervene, Joint Intervenors intend to rely on Diane D'Arrigo as an expert witness for this contention. Ms. D'Arrigo's initial declaration was attached to the Petition to Intervene. Ms. D'Arrigo's address is NIRS, 6930 Carroll Avenue, #340, Takoma Park, MD 20912; phone: 301-270-6477, e-mail: dianed@nirs.org. In accordance with 10 CFR 2.336, Joint Intervenors will supplement this disclosure if other witnesses are identified.

Documents: Joint Intervenors refer to the documents cited in our Petition to Intervene and Response Petition in this proceeding. Two additional documents have been identified, although these are in the possession of the NRC. They are transcripts of the Commissioners' Briefing on the Low-Level Waste Program, April 17, 2009, Parts 1 and 2, and are available at: <http://www.nrc.gov/reading-rm/doc-collections/commission/tr/2009/20090417a.pdf> and <http://www.nrc.gov/reading-rm/doc-collections/commission/tr/2009/20090417b.pdf>.

In accordance with 10 CFR 2.336, the Discovery Disclosure Agreement dated April 7, 2009, and the ASLB order of April 22, 2009, Joint Intervenors will supplement this disclosure monthly as additional documents are identified.

Respectfully submitted,

This 1st day of May 2009

Signed Electronically by _____

Michael Mariotte

Executive Director

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Executed in Accord with 10 CFR 2.304(d) _____

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CERTIFICATE OF SERVICE

It is our understanding that all on the Calvert Cliffs-3 service list are receiving this motion through the submission I am making on May 1, 2009 via the EIE system.

JOINT INTERVENORS INITIAL DISCLOSURES

Signed Electronically by _____

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 52-016

Calvert Cliffs-3 Nuclear Power Plant
Combined Construction and License Application

**AFFIDAVIT OF MICHAEL MARIOTTE CONCERNING
MANDATORY DISCLOSURE REQUIREMENTS OF 10 C.F.R. § 2.336**

I, Michael Mariotte, do hereby state as follows:

1. I am employed as executive director of Nuclear Information and Resource Service, a party in this proceeding.
2. In accordance with the Licensing Board's April 22, 2009 Memorandum and Order, I hereby certify that all relevant materials required to be disclosed pursuant to 10 C.F.R. § 2.336 in this proceeding have been disclosed and that the disclosures are accurate and complete as of April 30, 2009.
3. I hereby certify under penalty of perjury that the foregoing is true and complete to the best of my knowledge, information, and belief.

Respectfully submitted,

This 1st day of May 2009

_____. Signed Electronically by _____

Michael Mariotte
Executive Director
Nuclear Information and Resource Service
6930 Carroll Avenue, Suite 340
Takoma Park, MD 20912
301-270-6477