

August 31, 2009(3:08 pm)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
PLANNING AND
ADMINISTRATIVE STAFF

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before the Licensing Board:

G. Paul Bollwerk, III, Chairman
Nicholas G. Trikouros
Dr. James Jackson

In the Matter of)	Docket Nos. 52-025-COL and 52-026-COL
)	
Southern Nuclear Operating Company)	ASLBP No. 09-873-01-COL-BD01
)	
Vogtle Electric Generating Plant, Units 3 and 4)	August 31, 2009
)	

JOINT INTERVENORS' INITIAL MANDATORY DISCLOSURES

Pursuant to 10 C.F.R. § 2.336 and the Atomic Safety and Licensing Board (the "Board") August 17, 2009 Memorandum and Order (Ruling Regarding Joint Motion on Mandatory Disclosures and Request for Additional Scheduling Information) (the "Disclosure Order"), Center for a Sustainable Coast, Savannah Riverkeeper, Southern Alliance for Clean Energy, Atlanta Women's Action for New Directions, and Blue Ridge Environmental Defense League (collectively, "Joint Intervenors") hereby provide the required mandatory disclosures relevant to Joint Intervenors' admitted contention, SAFETY-1.

1. Expert Witnesses and Documents

Pursuant to 10 C.F.R. § 2.336(a)(1), Joint Intervenors disclose that they have engaged the following experts upon whom Joint Intervenors intend to rely upon as witnesses:

a. Arjun Makhijani, Ph.D.

Dr. Arjun Makhijani is an engineer with over 37 years of experience, much of it related to nuclear energy, including radioactive wastes. He is the President and Senior Engineer for the Institute for Energy and Environmental Research and is one of the principal investigators in the audit of the reconstruction of worker radiation doses under the Energy Employees Occupational Illness Compensation Program Act, which is contracted by the Centers for Disease Control and Prevention. His office is located at 6935 Laurel Ave., Suite 201, Takoma Park, Maryland 20912. Dr. Makhijani has not yet developed any analysis or authority relevant to the admitted contention and upon which he intends to base his opinion or testimony. Pursuant to Joint Intervenors' continuing duty of disclosure under 10 C.F.R. § 2.336(d) and the Disclosure Order, Joint Intervenors will disclose such information as Dr. Makhijani identifies and produces it.

b. Ms. Diane D'Arrigo

Ms. Diane D'Arrigo is the Radioactive Waste Project Director at the Nuclear Information and Resource Service, where she has been employed since 1986. Her office is located at 6930 Carroll Ave., Takoma Park, Maryland 20912. Ms. D'Arrigo has not yet developed any analysis or authority relevant to the admitted contention and upon which she intends to base her opinion or testimony. Pursuant to Joint Intervenors' continuing duty of disclosure under 10 C.F.R. § 2.336(d) and the Disclosure Order, Joint Intervenors will disclose such information as Ms. D'Arrigo identifies and produces it.

2. Data Compilations or Tangible Things

Pursuant to 10 C.F.R. § 2.336(a)(2), Joint Intervenors state that they have no documents, data compilations or tangible things relevant to the admitted contention in their possession. Joint Intervenors further state that they do not currently possess any privileged documents nor any

documents that would necessitate the compilation of a proprietary information log. As required under the Disclosure Order and 10 C.F.R. § 2.336(d), Joint Intervenors will update these disclosures if they obtain any relevant documents, data compilations or tangible things.

Dated: August 31, 2009

/signed (electronically) by/
Lawrence D. Sanders, Esq.
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Southern Nuclear Operating Company)	ASLBP No. 09-873-01-COL-BD01
)	
Vogtle Electric Generating Plant, Units 3 and 4)	August 31, 2009
)	

CERTIFICATION OF LAWRENCE D. SANDERS

Pursuant to 10 C.F.R. § 2.336(c), I, Lawrence D. Sanders, an attorney, hereby certify as follows:

1. I am an attorney employed by the Turner Environmental Law Clinic, located at Emory University School of Law, 1301 Clifton Road, Atlanta, Georgia 30322, and I am one of the counsel for Joint Intervenors in the above-captioned docket.
2. Included with this certification are the disclosures required under 10 C.F.R. § 2.336 for the Joint Intervenors in the above-captioned docket.
3. To the best of my knowledge, the attached disclosures include all relevant materials required by 10 C.F.R. § 2.336 and are accurate and complete as of the date of this certification.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 31, 2009

/signed (electronically) by/
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_____)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **JOINT INTERVENORS' INITIAL MANDATORY DISCLOSURES** and **AFFIDAVIT OF LAWRENCE D. SANDERS** were served upon the following persons by Electronic Information Exchange and/or electronic mail.

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Dated: August 31, 2009

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Hearing Docket

From: Goldstein, Mindy [magolds@emory.edu]
Sent: Monday, August 31, 2009 3:08 PM
To: OCAAMAIL Resource; Bollwerk, Paul; Trikouros, Nicholas; Jackson, James; jackson538@comcast.net; Bu, Wen; klw@nrc.gov; Hodgdon, Ann; Kirkwood, Sara; Gilman, Joseph; Moulding, Patrick; Price, Sarah; Lazar, Carol; Emily.Krauss@nrc.gov; Docket, Hearing; ksutton@morganlewis.com; sfrantz@morganlewis.com; pbessette@morganlewis.com; deckert@morganlewis.com; gmoore@balch.com; teribart61@aol.com; mcaston@southernco.com; kchairston@balch.com; sblanton@balch.com; plejeune@balch.com; OGCMailCenter Resource; robert.haemer@pillsburylaw.com
Cc: Sanders, Lawrence D; Goldstein, Mindy
Subject: Vogtle COL (Docket Nos. 52-025 and 52-026) - Joint Intervenors Initial Mandatory Disclosures
Attachments: Intervenors Initial Mandatory Disclosures.pdf

All,

Please find attached Joint Intervenors' Initial Mandatory Disclosures. After 5.5 hours of trying, it seems as though current technical issues on our university network will continue to prevent us from submitting anything through e-filing for some time. As soon as these problems are resolved, we will file electronically.

Thanks,
Mindy

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X-SBRS: 5.3

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Date: Mon, 31 Aug 2009 15:08:28 -0400

Subject: Vogtle COL (Docket Nos. 52-025 and 52-026) - Joint Intervenors
Initial Mandatory Disclosures

Thread-Topic: Vogtle COL (Docket Nos. 52-025 and 52-026) - Joint Intervenors
Initial Mandatory Disclosures

Thread-Index: AcoqbmX/TVnccvIKS42p1RSzVN2UHA==

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