

Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: 202-739-3000
Fax: 202-739-3001
www.morganlewis.com

Morgan Lewis
C O U N S E L O R S A T L A W

Stephen J. Burdick
202.739.5059
sburdick@morganlewis.com

January 4, 2010

Robert V. Eye, Esq.
Kauffman & Eye
112 SW 6th Ave., Suite 202
Topeka, KS 66603

Michael Spencer, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Third Update to Disclosures Pursuant to 10 C.F.R. § 2.336; *STP Nuclear Operating Co.*
(South Texas Project Units 3 and 4), Docket Nos. 52-012 and 52-013

Pursuant to 10 C.F.R. § 2.336, the agreement among the parties dated September 10, 2009, and the Initial Scheduling Order dated October 20, 2009, STP Nuclear Operating Company (STPNOC) is providing the third update to its disclosures with respect to Interveners' Contention 21, as restated and admitted by the Atomic Safety and Licensing Board (Board) on August 27, 2009 (LBP-09-21), and Contentions 8, 9, 14, and 16, as restated and admitted by the Board on September 29, 2009 (LBP-09-25).

STPNOC's disclosures consist of the following:

- Enclosure 1 is reserved for the names, addresses, and telephone numbers of the persons upon whose opinion STPNOC will base its positions on the contentions and upon whom STPNOC may rely as a witness, and a copy of the analyses and authorities upon which they base their opinions. STPNOC has not yet identified witnesses for any hearing on the contentions, and will update Enclosure 1 when it has identified its witnesses.
- Enclosure 2 provides a description, by category and location, of all relevant non-privileged documents, data compilations, and tangible things in the possession, custody, or control of STPNOC that are relevant to the admitted contentions in this proceeding. If you determine that you would like a copy of any of these documents, please inform me of which documents you would like, and I will provide a copy to you.

Mr. Robert V. Eye, et al.

January 4, 2010

Page 2

- Enclosure 3 provides an index of documents, data compilations, or tangible things in the possession, custody, or control of STPNOC that may be relevant to the contentions but contain proprietary-related or otherwise protected information. Upon request by the NRC Staff, STPNOC will provide a copy using the procedure in 10 C.F.R. § 2.390. If the Intervenor desire a copy, STPNOC will work with the Intervenor to develop a mutually acceptable proposed amendment to the Protective Order for issuance by the Board. STPNOC will provide any requested proprietary documents to the Intervenor after the Board has entered an amended Protective Order.
- Enclosure 4 provides an index of relevant documents that are otherwise publicly available.

In order to compile Enclosures 2, 3, and 4, STPNOC made a reasonable good faith search of its records since the previous disclosures filed on December 1, 2009. The attached affidavit attests that all relevant materials identified by this search have been disclosed, and that the disclosures are accurate and complete as of December 15, 2009. Additions to the logs since the last disclosures are highlighted.

In the event that STPNOC identifies additional relevant documents or the witnesses for any hearing on the contentions, STPNOC will update these disclosures on the 1st day of each month (subject to 10 C.F.R. § 2.306(a)), as required by 10 C.F.R. § 2.336(d), the agreement among the parties dated September 10, 2009, and the Initial Scheduling Order dated October 20, 2009.

STPNOC has been conservative in identifying documents for inclusion in Enclosures 2, 3, and 4. By identifying documents on those Enclosures, STPNOC does not necessarily concede that the documents are in fact relevant or material to the admitted contentions.

Sincerely,

Signed (electronically) by Stephen J. Burdick

Stephen J. Burdick

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Phone: 202-739-3000

Fax: 202-739-3001

E-mail: sburdick@morganlewis.com

Counsel for STP Nuclear Operating Company

Enclosures

cc: Service List

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|-------------------------------------|---|------------------------|
| In the Matter of |) | |
| |) | Docket Nos. 52-012-COL |
| STP NUCLEAR OPERATING COMPANY |) | 52-013-COL |
| |) | |
| (South Texas Project Units 3 and 4) |) | January 4, 2010 |
| |) | |

AFFIDAVIT

1. My name is Scott Head. My title is Manager, Regulatory Affairs for South Texas Project, Units 3 & 4. Working with the attorneys for STP Nuclear Operating Company (STPNOC), I have been responsible for managing the searches, collection, and compilation of documents, data compilations, and tangible things to comply with the mandatory disclosure requirements in 10 C.F.R. § 2.336.
2. This Affidavit relates to the disclosures that STPNOC is providing on January 4, 2010 in the above-captioned proceeding pursuant to 10 C.F.R. § 2.336, the parties' joint agreement on mandatory disclosures, dated September 10, 2009, and the Initial Scheduling Order, dated October 20, 2009.
3. A reasonable good faith search was conducted of documents, data compilations, and tangible things in the possession, custody, or control of STPNOC for the types of information specified in 10 C.F.R. § 2.336(a). As provided in 10 C.F.R. § 2.336(c), this search was conducted based on information and documents reasonably available to STPNOC:
 - a. The searches encompassed both electronic and paper documents.

- b. The searches encompassed both South Texas Project (STP) Units 3 and 4 project-related files and documents in the possession and control of STPNOC employees who have worked on the STP Units 3 and 4 project.
 - c. The searches also encompassed documents, data compilations, and tangible things in the possession and control of the vendors and contractors who have supported the STPNOC combined license application to the extent that STPNOC has rights to these documents, data compilations, and tangible things.
 - d. Searches did not encompass documents in the possession of individuals who did not work on the STP Units 3 and 4 project or files unrelated to the STP Units 3 and 4 project.
4. Enclosure 2 provides the index of relevant non-privileged, non-protected documents, data compilations, and tangible things that were located as a result of this search.
5. Enclosure 3 provides the index of relevant documents, data compilations, and tangible things containing proprietary-related or otherwise protected information.
6. Enclosure 4 provides the index of relevant documents, data compilations, and tangible things that are publicly available.
7. With respect to admitted Contentions 8, 9, 14, and 16, the parties agreed on October 2, 2009 to limit disclosures based on the following criteria:
 - a. STPNOC will produce all relevant documents, data compilations, or other tangible things for these contentions that have been generated or collected as part of the STP Units 3 and 4 project and are in STPNOC's possession, custody, or control.

- b. In addition to the above information, STPNOC will produce compilations or summary reports of relevant information related to operation of STP Units 1 and 2, such as information on radioactive particulates in the Main Cooling Reservoir (MCR) sediment, that have been prepared during the last five years and are in the possession of STP Units 1 and 2 personnel. For example, STPNOC will produce documents such as the Annual Environmental Operating Report, the Annual Radioactive Effluent Release Report, and the Annual Water Use Report.
 - i. STPNOC does not need to produce: 1) raw data or samples from environmental monitoring for STP Units 1 and 2; 2) documents that only describe activities related to operation of STP Units 1 and 2; or 3) documents that do not provide compilations of data regarding water quality and radionuclide concentrations in the MCR, adjacent surface waters, or groundwater.
 - c. Following the initial disclosures on these contentions, the Intervenors may request production of other documents that are relevant to the admitted contentions. STPNOC will provide documents to the Intervenors in response to any reasonable requests.
8. STPNOC has been conservative in identifying documents for inclusion in Enclosures 2, 3, and 4. By identifying documents on those Enclosures, I do not necessarily concede that the documents are in fact relevant or material to the admitted contentions.
9. These disclosures are accurate and complete as of December 15, 2009.

The statements made above are true to the best of my knowledge, information, and belief.

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

Executed in Accord with 10 C.F.R. § 2.304(d)

Scott M. Head

Manager, Regulatory Affairs

South Texas Project, Units 3 & 4

4000 Avenue F – Suite A

Bay City, TX 77414

Phone: 361-972-7136

Fax: 361-972-8298

E-mail: smhead@stpegs.com

Executed this 4th day of January 2010

ENCLOSURE 1

STPNOC WITNESSES

The name and, if known, the address and telephone number of any person, including any expert, upon whose opinion the party bases its claims and contentions and may rely upon as a witness:

Response:

STPNOC has not yet identified the persons that it may rely upon as its witnesses. STPNOC will update this disclosure when it has identified such persons.

A copy of the analysis or other authority upon which that person bases his or her opinion:

Response:

Currently, STPNOC bases its position on the following sections of the Environmental Report (ER) for STP Units 3 and 4 and the references cited therein:

- Contentions 8, 9, and 14 - - ER §§ 2.3, 3.3, 3.5, 5.2, and 5.4, and the revisions to ER §§ 2.3.1, 5.2, and 5.4 identified in November 11, 2009 and November 23, 2009 letters to the NRC.
- Contention 16 - - STPNOC's September 28, 2009 response to Request for Additional Information No. 05.10-4, which includes revisions to the ER.
- Contention 21 - - ER §§ 7.1, 7.2, and 7.3, and the new ER § 7.5S identified in a November 10, 2009 letter to the NRC.

STPNOC will update this disclosure when it has identified the persons that it may use as witnesses and the analyses and authorities upon which they base their opinion.

ENCLOSURE 2

Mandatory Disclosure Log

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|------------|-------------------------|---------------------|-----|--|------------|
| 1 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Execution File for MACCS2 Code | 21 |
| 2 | 9/30/2005 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Execution File for MACCS2 Code | 21 |
| 3 | 4/19/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MET Input File for MACCS2 Code (2000 STP Meteorological Input Data) | 21 |
| 4 | 3/19/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | SIT Input File for MACCS2 Code (2060 Population Projection) | 21 |
| 5 | 4/19/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MET Input File for MACCS2 Code (1997 STP Meteorological Input Data) | 21 |
| 6 | 4/19/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MET Input File for MACCS2 Code (1999 STP Meteorological Input Data) | 21 |
| 7 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | ATMOS Input File for MACCS2 Code (STP ABWR) | 21 |
| 8 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | CHRONC Input File for MACCS2 Code (STP ABWR) | 21 |
| 9 | 3/25/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | EARLY Input File for MACCS2 Code (STP ABWR) | 21 |
| 10 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MACCS2 Output File (2000 STP Meteorological Input Data) | 21 |
| 11 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MACCS2 Output File (1997 STP Meteorological Input Data) | 21 |
| 12 | 4/20/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | MACCS2 Output File (1999 STP Meteorological Input Data) | 21 |
| 13 | N/A | Morgan, Lewis & Bockius | GE Nuclear | N/A | Section 19E.3 (Consequence Analysis) of ABWR Standard Safety Analysis Report | 21 |
| 14 | N/A | Morgan, Lewis & Bockius | GE Nuclear | N/A | Section 19E.3 of ABWR Design Control Document/Tier 2 | 21 |
| 15 | 11/18/1994 | Morgan, Lewis & Bockius | GE Nuclear | N/A | Technical Support Document for the ABWR, Rev. 1, MPL No. A90-3230 | 21 |
| 16 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |
| 17 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |
| 18 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |

*Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.
DB1/64124119.1

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|-----------|-------------------------|---|-----------------------|--|------------|
| 19 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |
| 20 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |
| 21 | 7/9/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Diversion Flows | 14 |
| 22 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 23 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 24 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 25 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 26 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 27 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 28 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 29 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 30 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 31 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 32 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 33 | 10/2/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation | 14 |
| 34 | 2/23/2005 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | N/A | 2004 Annual Water Use Report | 16 |
| 35 | 2/22/2006 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | N/A | 2005 Annual Water Use Report | 16 |
| 36 | 2/22/2007 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | N/A | 2006 Annual Water Use Report | 16 |
| 37 | 2/25/2008 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | N/A | 2007 Annual Water Use Report | 16 |
| 38 | 2/24/2009 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | N/A | 2008 Annual Water Use Report | 16 |
| 39 | 9/9/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Validation Package for RAI 03.03-01 | 14, 16 |
| 40 | 8/21/2007 | Morgan, Lewis & Bockius | Julie Leong, GE | David Wagner, Bechtel | E-mail Re: Table 12.2-22 | 8, 9 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|---------------|-------------------------|---------------------------------|--|---|--------------|
| 41 | 3/18/2009 | Morgan, Lewis & Bockius | Will Pietkiewicz, Fluor | N/A | Well Water Plan of Action | 16 |
| 42 | 8/6/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Impact of UHS Relocation & Slurry Wall Construction on Groundwater, Rev. 1 | 8, 9, 14, 16 |
| 43 | 3/24/2009 | Morgan, Lewis & Bockius | MACTEC | Fluor | Review of Bechtel Calculation 2593-501-G65-GEK-001, Rev. 000 and COLA Sections | 16 |
| 44 | 7/11/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Validation Package for RAI 02.04.01-2 | 16 |
| 45 | November 2008 | Morgan, Lewis & Bockius | Fluor | N/A | Scope of Activities for STPNOC Contractors | 9, 16 |
| 46 | 7/14/2008 | Morgan, Lewis & Bockius | Lansing Dusek, Fluor | Sheila Koza | E-mail Re: Schedule for "Bechtel Borings" | 8, 9, 14, 16 |
| 47 | 4/10/1975 | Morgan, Lewis & Bockius | Woodward-Clyde Consultants | John T. Mooney, Project Manager, Engineering | Water Supply Wells South Texas Project | 16 |
| 48 | 8/6/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Slurry Wall Effect on Groundwater - COLA Change Validation Package | 8, 9, 16 |
| 49 | 6/26/2009 | Morgan, Lewis & Bockius | Matt Featherston, Fluor | N/A | Fluor Nuclear Power Extent-of-Condition Investigation Results, Review for Inconsistencies Between STP 3 and 4 COLA (Rev. 2) FSAR and Environmental Report | 16 |
| 50 | 6/15/2008 | Morgan, Lewis & Bockius | Lansing Dusek, Fluor | Sheila Koza | E-mail Re: White Paper for the UHS - Groundwater | 16 |
| 51 | 2/20/2002 | Morgan, Lewis & Bockius | Reliant Energy | Texas Water Development Board | Water Survey | 16 |
| 52 | 2/14/2003 | Morgan, Lewis & Bockius | Reliant Energy | Texas Water Development Board | Water Survey | 16 |
| 53 | 2/24/2004 | Morgan, Lewis & Bockius | STPNOC | Texas Water Development Board | Water Survey | 16 |
| 54 | 2/21/2007 | Morgan, Lewis & Bockius | STP Electric Generating Station | Texas Water Development Board | Water Use Survey – Industrial | 16 |
| 55 | 9/15/2008 | Morgan, Lewis & Bockius | MACTEC | Fluor | Final Data Report (Observation Wells) | 8, 9, 14, 16 |
| 56 | 6/17/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Total Well Usage | 16 |
| 57 | 9/10/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Graph of Groundwater Withdrawals | 16 |
| 58 | 5/29/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Water Flow Discrepancies in ER & FSAR | 16 |
| 59 | 6/16/2009 | Morgan, Lewis & Bockius | Jim Golden, Fluor | Will Pietkiewicz, Fluor | E-mail Re: Unit 1 & 2 Well Water Usage Pre 1995 | 16 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|------------|-------------------------|--|--|--|--------------|
| 60 | 6/25/2009 | Morgan, Lewis & Bockius | Kenneth Gartner, STPNOC | Jim Golden, Fluor | E-mail Re: Water Usage | 16 |
| 61 | 11/13/1987 | Morgan, Lewis & Bockius | Houston Lighting & Power | N/A | Well Water / Freshwater / Service Water, Rev. 3 – System Description Cover Sheet | 16 |
| 62 | 7/30/2009 | Morgan, Lewis & Bockius | Jim Golden, Fluor | Will Pietkiewicz, Matthew Featherston, Fluor | E-mail Re: STP Units 1 and 2 Groundwater Use | 16 |
| 63 | 7/30/2007 | Morgan, Lewis & Bockius | STPNOC | N/A | Well Water Pump Designs | 16 |
| 64 | 2/7/2008 | Morgan, Lewis & Bockius | Coastal Plains Groundwater Conservation District | STPNOC | Operating Permit | 16 |
| 65 | 6/21/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Well Water Available | 16 |
| 66 | 12/22/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Pond Level Calculations | 16 |
| 67 | 2/16/2006 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | Texas Water Development Board | Industrial Water Use Survey for the Calendar Year Ending December 31, 2005 | 16 |
| 68 | 2/22/2005 | Morgan, Lewis & Bockius | South Texas Project Electric Generating Station | Texas Water Development Board | Industrial Water Use Survey for the Calendar Year Ending December 31, 2004 | 16 |
| 69 | 3/10/2009 | Morgan, Lewis & Bockius | Sargent & Lundy | N/A | Evaluation of STP 3 & 4 COLA Section 2.4S, Rev. A | 8, 9, 16 |
| 70 | 5/1/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Streams and Flow Rates | 8, 9, 14, 16 |
| 71 | 8/18/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Groundwater Withdrawals | 16 |
| 72 | 9/15/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Groundwater Withdrawals | 16 |
| 73 | 3/26/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Evaluation of Bechtel Calculation 25293-000-K0C-HPYG-00001, Rev. 1 Projected Water Use | 16 |
| 74 | 4/8/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Evaluation of Bechtel Calculation 25293-401-MOC-WA-00001, Rev. 1 Water Balance Calculation | 16 |
| 75 | 8/31/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Water Balance | 14, 16 |
| 76 | 6/10/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Meeting Minutes STP Units 3 & 4 Water Needs | 16 |
| 77 | 6/30/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Surveying Services for Water Wells | 8, 9, 16 |
| 78 | 5/1/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Water Conservation Plan, Rev. 2 | 16 |
| 79 | 11/20/1987 | Morgan, Lewis & Bockius | South Texas Project | N/A | Well Water Supply System, Rev. 5 | 16 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|------------|-------------------------|---|---|---|------------|
| 80 | 1/10/2008 | Morgan, Lewis & Bockius | STPNOC | Coastal Plains Groundwater Conservation District | Permit Application Renewal | 16 |
| 81 | 7/13/2009 | Morgan, Lewis & Bockius | Texas Commission on Environmental Quality | N/A | Notice of Receipt of Application and Intent to Obtain Water Quality Permit Renewal | 8 |
| 82 | 7/17/2008 | Morgan, Lewis & Bockius | John L. Stone, STPNOC | Steven Blossom, Donald Ray, David Dujka, Milton Rejcek, and Ronnie Gipson, STPNOC | E-mail Re: Deep Aquifer Info | 9 |
| 83 | 9/1/2009 | Morgan, Lewis & Bockius | Amy Ballinger, STPNOC | Milton Rejcek, STPNOC | E-mail Re: Shallow Aquifer Wells and Groundwater Samples at STP Site | 9 |
| 84 | 2/23/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Groundwater and Potable Data | 16 |
| 85 | 8/11/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | STP Information Request Regarding Shallow Aquifer Wells and Groundwater Samples at STP Site | 9 |
| 86 | 8/18/2009 | Morgan, Lewis & Bockius | John Crenshaw, STPNOC | Milton Rejcek, STPNOC | E-mail Re: Tritium | 9 |
| 87 | 6/22/2009 | Morgan, Lewis & Bockius | Sandra Dannhardt, STPNOC | Derek Bass, STPNOC | E-mail Re: Unit 1 & 2 Well Water Usage Pre-1995 | 16 |
| 88 | 5/7/2009 | Morgan, Lewis & Bockius | Sandra Dannhardt, STPNOC | Milton Rejcek, STPNOC | E-mail Re: Units 3 and 4 Liquid Radwaste Effluents | 9 |
| 89 | 6/11/2009 | Morgan, Lewis & Bockius | Sandra Dannhardt, STPNOC | Jim Golden, Fluor | E-mail Re: Groundwater, Well Water Usage | 16 |
| 90 | 6/3/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Well Water Usage Tables | 16 |
| 91 | 11/25/2008 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 92 | 11/25/2008 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 93 | 11/25/2008 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 94 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 95 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 96 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 97 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 98 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |
| 99 | 8/29/2007 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Distance or Time Versus Drawdown for a Confined Aquifer | 16 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|-------------|-------------------------|----------------------------------|--|---|--------------|
| 100 | August 2007 | Morgan, Lewis & Bockius | Tetra Tech | Bechtel | Water Use Calculation Package for South Texas Project COL | 16 |
| 101 | 9/28/2009 | Morgan, Lewis & Bockius | Russell W. Kiesling, STPNOC | Scott Head, STPNOC | E-mail Re: Future Water Use Impacts | 16 |
| 102 | 9/21/2009 | Morgan, Lewis & Bockius | Milton Rejcek, STPNOC | Scott Head, STPNOC | E-mail Re: Well Water | 16 |
| 103 | 9/21/2009 | Morgan, Lewis & Bockius | Scott Head, STPNOC | Milton Rejcek, STPNOC | E-mail Re: Automated Groundwater Pumps | 16 |
| 104 | 9/19/1994 | Morgan, Lewis & Bockius | NRC | Houston Lighting & Power Company | Units 1 and 2 – Safety Evaluation on the Main Cooling Reservoir and Essential Cooling Pond Performance During and After Filling | 14 |
| 105 | 2/22/1993 | Morgan, Lewis & Bockius | Houston Lighting & Power Company | NRC | Performance of Main Cooling Reservoir and Essential Cooling Pond During and After Filling | 14 |
| 106 | 10/21/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Well Data | 8, 9, 14, 16 |
| 107 | 10/21/2009 | Morgan, Lewis & Bockius | MACTEC | N/A | Well Locations for Units 3 and 4 | 8, 9, 14, 16 |
| 108 | 8/19/2009 | Morgan, Lewis & Bockius | STPNOC | Coastal Plains Groundwater Conservation District | South Texas Project Units 3 & 4 Monitoring Well Registration | 8, 9, 14, 16 |
| 109 | 5/27/2009 | Morgan, Lewis & Bockius | Russell W. Kiesling, STPNOC | Bob Schrauder and Bill McConaghy, Toshiba | E-mail Re: Water Flow Discrepancies in ER & FSAR | 16 |
| 110 | 6/8/2009 | Morgan, Lewis & Bockius | Debbie Johnson, Fluor | Matthew Featherston, Fluor | E-mail Re: Water Balance | 14, 16 |
| 111 | 6/8/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Water Balance | 14, 16 |
| 112 | 4/10/2009 | Morgan, Lewis & Bockius | MACTEC | N/A | Scope of Work – Hydrology and Groundwater | 8, 9, 14, 16 |
| 113 | 5/29/2009 | Morgan, Lewis & Bockius | Russell Kiesling, STPNOC | Lanny Dusek, Fluor | E-mail Re: Discussion of ER and FSAR Discrepancies – Water Usage | 16 |
| 114 | 5/29/2009 | Morgan, Lewis & Bockius | STPNOC | N/A | ER Table 3.3-1 with Annotations | 16 |
| 115 | 11/8/2005 | Morgan, Lewis & Bockius | Milton Rejcek, STPNOC | N/A | Outage Comparisons | 8, 9, 16 |
| 116 | 11/14/2006 | Morgan, Lewis & Bockius | Milton Rejcek, STPNOC | N/A | Outage Comparisons | 8, 9, 16 |
| 117 | 9/30/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Well Water Planning Update | 16 |
| 118 | 8/20/2009 | Morgan, Lewis & Bockius | Jim Golden, Fluor | Robert Watkins, Matthew Featherston, Fluor | E-mail Re: Units 3 and 4 Monitoring Wells Registration | 16 |
| 119 | 7/28/2009 | Morgan, Lewis & Bockius | MACTEC | N/A | Monitoring Well Locations for Units 3 and 4 | 16 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|------------|-------------------------|----------------------------|--|--|--------------|
| 120 | 3/16/2009 | Morgan, Lewis & Bockius | Robert Watkins, Fluor | Jim Golden, Fluor | E-mail Re: Water Needs During Construction Meeting Minutes | 16 |
| 121 | 3/16/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Construction and Operation Well Water Use | 16 |
| 122 | 8/17/2009 | Morgan, Lewis & Bockius | Matthew Featherston, Fluor | Will Pietkiewicz, Fluor | E-mail Re: Groundwater Assumption Question | 16 |
| 123 | 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Groundwater Usage 1992-Present | 16 |
| 124 | 7/13/2009 | Morgan, Lewis & Bockius | Jim Golden, Fluor | Will Pietkiewicz, Matthew Featherston, Fluor | E-mail Re: Measuring Diverted Flow to the MCR | 16 |
| 125 | 3/4/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Well Water Usage | 16 |
| 126 | 2/24/2009 | Morgan, Lewis & Bockius | Robert Watkins, Fluor | Jim Golden and Will Pietkiewicz, Fluor | E-mail Re: Groundwater Info | 16 |
| 127 | 3/27/2009 | Morgan, Lewis & Bockius | Will Pietkiewicz, Fluor | Dennis McBride, Fluor | E-mail Re: STP-Recommendation for Potable Water and Sewer Flow Capacity | 16 |
| 128 | 3/27/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Personnel Water Use | 16 |
| 129 | 5/16/2008 | Morgan, Lewis & Bockius | Will Pietkiewicz, Fluor | STPNOC | E-mail Re: Potable Water Facility Capacity | 16 |
| 130 | 3/18/2009 | Morgan, Lewis & Bockius | Jim Golden, Fluor | Fluor Personnel | E-mail Re: Water Needs During Construction Meeting Minutes | 16 |
| 131 | 6/13/2008 | Morgan, Lewis & Bockius | Fluor | N/A | Impact of UHS Relocation & Slurry Wall Construction on Groundwater, Rev. 0 | 8, 9, 14, 16 |
| 132 | 2/10/2009 | Morgan, Lewis & Bockius | Will Pietkiewicz, Fluor | Robert Watkins, Fluor | E-mail Re: Water Usage Estimate | 16 |
| 133 | 2/5/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Potable Water Analysis | 16 |
| 134 | 6/12/2009 | Morgan, Lewis & Bockius | Will Pietkiewicz, Fluor | Jim Golden, Fluor | E-mail Re: Agenda and Comments from Water Needs Meeting | 16 |
| 135 | 6/11/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Agenda for Water Needs Meeting | 16 |
| 136 | 11/6/2008 | Morgan, Lewis & Bockius | Dennis Graves, Fluor | Lanny Dusek, Fluor | E-mail Re: Dredging the STP MCR | 8, 9 |
| 137 | 12/03/2008 | Morgan, Lewis & Bockius | Milton Rejcek, STPNOC | Dennis Graves, Fluor | E-mail Re: MCR Sediment Concentration | 8 |
| 138 | 2008 | Morgan, Lewis & Bockius | Unknown | N/A | Measured Activity in Environmental Media – 2007 | 8 |
| 139 | 8/29/1975 | Morgan, Lewis & Bockius | Woodward-Clyde Consultants | Brown and Root, Inc. | Basic Data Report – Ground Water South Texas Project | 8, 9, 14, 16 |
| 140 | 8/3/2006 | Morgan, Lewis & Bockius | NALCO | N/A | STPNOC Cooling Water Data, Main Cooling Reservoir | 14 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-------|---------------|-------------------------|--------------------------|-----|--|------------|
| 141 | 10/31/2006 | Morgan, Lewis & Bockius | NALCO | N/A | STPNOC Cooling Water Data, Main Cooling Reservoir | 14 |
| 142 | 5/21/1993 | Morgan, Lewis & Bockius | Houston Lighting & Power | EPA | Wastewater Discharge Permit Renewal | 8, 9, 14 |
| 143 | November 2009 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Validation Package for ER Section 2.3.1.1.2.1 | 8, 9, 14 |
| 144 | November 2009 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Validation Package for ER Section 5.2.3 | 8, 9, 14 |
| 145 | November 2009 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Validation Package for ER Section 5.4.1 | 8 |
| 146 | 10/19/2009 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Calculation of Impacts at Collocated Units from an Initiating Accident at a Site Unit | 21 |
| 147 | June 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Sampling Results from June 2009 | 8, 9, 14 |
| 148 | 1/26/2000 | Morgan, Lewis & Bockius | STPNOC | N/A | Design Criteria for Equipment Qualification Program | 21 |
| 149 | November 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Calculation of Equilibrium Concentration of Co-60 | 8 |
| 150 | November 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Detection Sensitivity in Sediments | 8 |
| 151 | November 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Calculation of Equilibrium Concentration of Co-60 | 8 |
| 152 | 2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation - Daily Data - Historical River Flow, Case 3, 93% Load Factor | 8, 9, 14 |
| 153 | 2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Estimate of MCR Level Under 4 Unit Operation - Daily Data - WAM PROJECTION 2060 with LSWP | 8, 9, 14 |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

ENCLOSURE 3

Proprietary Log

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION | BASIS FOR PROPRIETARY STATUS |
|-------|-----------|-------------------------|--|--------------|---|--------------|--------------------------------------|
| 1 | 4/28/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | COL Application Environmental Report Doses, Rev. 1 – Calculation Sheet | 8, 9, 21 | Bechtel Proprietary Information |
| 2 | 6/3/2009 | Morgan, Lewis & Bockus | Bechtel | N/A | COL Application Environmental Report Doses, Rev. 2 – Calculation Sheet | 8, 9, 21 | Bechtel Proprietary Information |
| 3 | 6/30/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | COL Application Environmental Report Doses, Rev. 3 – Calculation Sheet | 8, 9, 21 | Bechtel Proprietary Information |
| 4 | 6/30/2008 | Morgan, Lewis & Bockius | Westinghouse Containment and Radiological Analysis | B. F. Maurer | Letter Regarding Cleanup Water Line Break Doses in the ABWR DCD | 21 | Westinghouse Proprietary Information |
| 5 | 1/22/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Hydraulic Gradient, Average Linear Groundwater Velocity and Travel Time, Rev. 3 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 6 | 1/22/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Accidental Release of Liquid Effluent in Groundwater, Rev. 3 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 7 | 7/11/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | Hydraulic Gradient, Average Linear Groundwater Velocity and Travel Time, Rev. 2 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 8 | 7/25/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Water Balance, Rev. 1 – Calculation Sheet | 14, 16 | Bechtel Proprietary Information |
| 9 | 2/14/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | Liquid Tank Rupture Activity Releases, Rev. 1 – Calculation Sheet | 8, 9 | Bechtel Proprietary Information |
| 10 | 3/30/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Hydraulic Gradient Impact Engineering Study | 8, 9, 14, 16 | Bechtel Proprietary Information |

*Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.
DB1/64124119.1

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION | BASIS FOR PROPRIETARY STATUS |
|-------|------------|-------------------------|---|--------|--|--------------|---------------------------------|
| 11 | 12/11/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | Groundwater Flow Model for Shallow Aquifer, Rev. 1 – Calculation Sheet | 8, 9, 14, 16 | Bechtel Proprietary Information |
| 12 | 7/29/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | MCR Blowdown Analysis for Existing Units 1 & 2 and Conversion of 4-Unit Model Results to TDS Concentration – Calculation Sheet | 14 | Bechtel Proprietary Information |
| 13 | 2/12/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | MCR Water Budget Analysis, Rev. 1 – Calculation Sheet | 14 | Bechtel Proprietary Information |
| 14 | 6/6/2008 | Morgan, Lewis & Bockius | Bechtel | N/A | Projected Water Use, Rev. 1 – Calculation Sheet | 14, 16 | Bechtel Proprietary Information |
| 15 | 5/20/2009 | Morgan, Lewis & Bockius | MACTEC Engineering and Consulting, Inc. | STPNOC | Conceptual Site Model for Units 1 and 2 Groundwater Protection Initiative | 8, 9, 14, 16 | STP Proprietary Information |
| 16 | 9/10/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Plant Water Balance, Rev. C – Calculation Sheet | 16 | Fluor Proprietary Information |
| 17 | 9/16/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Site Groundwater Use, Rev. B – Calculation Sheet | 16 | Fluor Proprietary Information |
| 18 | 7/10/2007 | Morgan, Lewis & Bockius | Bechtel | N/A | Projected Water Use, Rev. 0 – Calculation Sheet | 16 | Bechtel Proprietary Information |
| 19 | 8/6/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Plant Water Balance, Rev. A | 16 | Fluor Proprietary Information |
| 20 | 9/24/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Potable Water System Design Description, Rev. C | 16 | Fluor Proprietary Information |
| 21 | 5/1/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Plant Water Balance, Rev. A | 16 | Fluor Proprietary Information |
| 22 | 8/17/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Plant Water Balance, Rev. B | 16 | Fluor Proprietary Information |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION | BASIS FOR PROPRIETARY STATUS |
|-------|------------|-------------------------|---------------------|-----|--|--------------|---------------------------------|
| 23 | 8/18/2009 | Morgan, Lewis & Bockius | Fluor | N/A | Site Groundwater Use, Rev. A | 16 | Fluor Proprietary Information |
| 24 | 1/20/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | MCR Blowdown Analysis | 14 | Bechtel Proprietary Information |
| 25 | 2009 | Morgan, Lewis & Bockius | STPNOC | N/A | Well Pump Test Data | 8, 9, 14, 16 | STPNOC Proprietary Information |
| 26 | 9/10/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Accidental Release of Liquid Effluent in Groundwater, Rev. 4 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 27 | 10/12/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Accidental Release of Liquid Effluent in Groundwater, Rev. 5 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 28 | 9/17/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | Hydraulic Gradient, Average Linear Groundwater Velocity, Travel Time, and Groundwater Level Trends, Rev. 4 – Calculation Sheet | 8, 9, 14 | Bechtel Proprietary Information |
| 29 | 9/23/2009 | Morgan, Lewis & Bockius | Bechtel | N/A | MCR Blowdown Re-Analysis for 4-Unit Operation – Calculation Sheet | 8, 14 | Bechtel Proprietary Information |

* Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

ENCLOSURE 4

Publicly Available Log

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|------------|--|---|-----|--|--------------|
| 1 | May 1998 | Available at http://www.doeal.gov/SWEIS/OtherDocuments/481%20MACCS2%20Vol%201.pdf | NRC | N/A | NUREG/CR-6613 (SAND97-0594) - Code Manual for MACCS2: Volume 1, User's Guide | 21 |
| 2 | April 2005 | Available at ADAMS Accession No. ML051260127 | South Texas Project Electric Generating Station | N/A | 2004 Annual Environmental Operating Report | 8, 9, 14, 16 |
| 3 | April 2006 | Available at ADAMS Accession No. ML061250075 | South Texas Project Electric Generating Station | N/A | 2005 Annual Environmental Operating Report | 8, 9, 14, 16 |
| 4 | April 2007 | Available at ADAMS Accession No. ML071270211 | South Texas Project Electric Generating Station | N/A | 2006 Annual Environmental Operating Report | 8, 9, 14, 16 |
| 5 | April 2008 | Available at ADAMS Accession No. ML081280093 | South Texas Project Electric Generating Station | N/A | 2007 Annual Environmental Operating Report | 8, 9, 14, 16 |
| 6 | April 2009 | Available at ADAMS Accession No. ML091310066 | South Texas Project Electric Generating Station | N/A | 2008 Annual Environmental Operating Report | 8, 9, 14, 16 |
| 7 | April 2005 | Available at ADAMS Accession No. ML051610266 | South Texas Project Electric Generating Station | N/A | Radioactive Effluent Release Report for 2004 | 8, 9 |
| 8 | April 2006 | Available at ADAMS Accession No. ML061290125 | South Texas Project Electric Generating Station | N/A | Radioactive Effluent Release Report for 2005 | 8, 9 |
| 9 | April 2007 | Available at ADAMS Accession No. ML071280681 | South Texas Project Electric Generating Station | N/A | Radioactive Effluent Release Report for 2006 | 8, 9 |
| 10 | April 2008 | Available at ADAMS Accession No. ML081300023 | South Texas Project Electric Generating Station | N/A | Radioactive Effluent Release Report for 2007 | 8, 9 |
| 11 | April 2009 | Available at ADAMS Accession No. ML091200487 | South Texas Project Electric Generating Station | N/A | Radioactive Effluent Release Report for 2008 | 8, 9 |
| 12 | 8/3/2005 | Available at ADAMS Accession No. ML052290091 | South Texas Project Electric Generating Station | NRC | Renewal of the Wastewater Discharge Permit | 8 |

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|---------------|--|---|-----|--|--------------|
| 13 | June 2009 | Available at http://www.nei.org/filefolder/NEI_Study_Water_June2009_v3.pdf | Nuclear Energy Institute | N/A | Water Use, Electric Power, and Nuclear Energy | 16 |
| 14 | March 2009 | Available at http://tceq.state.tx.us/assets/public/permitting/waterquality/forms/10411_10055ins.pdf | Texas Commission on Environmental Quality | N/A | Completing the Industrial Wastewater Permit Application | 8, 16 |
| 15 | 1986 | Available in Print | Fletcher G. Driscoll | N/A | Groundwater and Wells, Second Edition | 16 |
| 16 | 1996 | Available at http://www.lib.utexas.edu/geo/maps.html | The University of Texas at Austin, Bureau of Economic Geology | N/A | Physiographic Map of Texas | 8, 9, 14, 16 |
| 17 | 1996 | Available at http://capp.water.usgs.gov/gwa/ch_e/index.html | Ryder, Paul D., U.S. Geological Survey | N/A | Ground Water Atlas of the United States - Oklahoma, Texas | 8, 9, 14, 16 |
| 18 | 2000 | Available at http://www.twdb.state.tx.us/mapping/index.asp | Texas Water Development Board | N/A | Major Aquifers of Texas | 8, 9, 14, 16 |
| 19 | 1979 | Available at http://www.twdb.state.tx.us/publications/reports/GroundWaterReports/GWReports/Individual%20Report%20html%20files/Report%20236.htm | Texas Department of Water Resources | N/A | Stratigraphic and Hydrogeologic Framework of Part of the Coastal Plain of Texas | 8, 9, 14, 16 |
| 20 | 1969 | Available at http://www.twdb.state.tx.us/publications/reports/GroundWaterReports/GWReports/Individual%20Report%20html%20files/Report%2091.htm | Texas Water Development Board, Lower Colorado River Authority, and Matagorda County Commissioners Court | N/A | Ground-Water Resources of Matagorda County, Texas, Texas Water Development Board Report 91 | 8, 9, 14, 16 |
| 21 | N/A | Available at http://www.twdb.state.tx.us/publications/reports/GroundWaterReports/GWDatabaseReports/GWdatabaserpt.htm | Texas Water Development Board | N/A | Matagorda County Groundwater Database | 8, 9, 14, 16 |
| 22 | February 2006 | Available at http://www.twdb.state.tx.us/publications/reports/GroundWaterReports/GWReports/R365/AGCindex.htm | Texas Water Development Board | N/A | Aquifers of the Gulf Coast of Texas | 8, 9, 14, 16 |
| 23 | October 1977 | Available at http://www.nrc.gov/reading-rm/doc-collections/reg-guides/power-reactors/active/ | NRC | N/A | Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, RG 1.109, Rev. 1 | 8, 9 |

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|---------------|--|---------------------|-----|---|------------|
| 24 | July 1977 | Available at http://www.nrc.gov/reading-rm/doc-collections/reg-guides/power-reactors/active/ | NRC | N/A | Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routing Releases from Light-Water-Cooled Reactors, RG 1.111, Rev. 1 | 8, 9 |
| 25 | 10/1/2007 | Available at ADAMS Accession No. ML081300728 | STPNOC | N/A | Offsite Dose Calculation Manual, Rev. 15 | 8, 9 |
| 26 | December 2006 | Available at http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0713/v27/ | NRC | N/A | Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities – 2005, NUREG-0713, Vol. 27 | 8, 9 |
| 27 | December 2005 | Available at http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0713/v26/ | NRC | N/A | Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities – 2004, NUREG-0713, Vol. 26 | 8, 9 |
| 28 | January 1997 | Available at http://www.osti.gov/energycitations/servlets/purl/446391-rCqSr4/webviewable/446391.pdf | NRC | N/A | NUREG/BR-0184, Regulatory Analysis Technical Evaluation Handbook | 21 |
| 29 | 1/1/2006 | Available at ADAMS Accession No. ML061290127 | STPNOC | N/A | Offsite Dose Calculation Manual, Rev. 13 | 8, 9 |

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | |
|---------------------------------------|------------------------|
| In the Matter of) | |
| STP NUCLEAR OPERATING COMPANY) | Docket Nos. 52-012-COL |
| (South Texas Project Units 3 and 4)) | 52-013-COL |
|) | January 4, 2010 |

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2010 a copy of STP Nuclear Operating Company's "Third Update to Disclosures Pursuant to 10 C.F.R. § 2.336" was served by the Electronic Information Exchange on the following recipients:

Administrative Judge
Michael M. Gibson, Chair
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: mmg3@nrc.gov

Administrative Judge
Dr. Gary S. Arnold
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: gxa1@nrc.gov

Administrative Judge
Dr. Randall J. Charbeneau
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: Randall.Charbeneau@nrc.gov

Office of the Secretary
U.S. Nuclear Regulatory Commission
Rulemakings and Adjudications Staff
Washington, DC 20555-0001
E-mail: hearingdocket@nrc.gov

Sara Kirkwood
Michael Spencer
Jessica Bielecki
Anthony Wilson
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Mail Stop O-15D21
Washington, DC 20555-0001
E-mail: Sara.Kirkwood@nrc.gov
Michael.Spencer@nrc.gov
Jessica.Bielecki@nrc.gov
Anthony.Wilson@nrc.gov

Robert V. Eye
Counsel for the Intervenors
Kauffman & Eye
112 SW 6th Ave., Suite 202
Topeka, KS 66603
E-mail: bob@kauffmaneye.com

Office of Commission Appellate Adjudication
U.S. Nuclear Regulatory Commission
Mail Stop: O-16C1
Washington, DC 20555-0001
E-mail: ocaamail@nrc.gov

Signed (electronically) by Stephen J. Burdick
Stephen J. Burdick
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Phone: 202-739-3000
Fax: 202-739-3001
E-mail: sburdick@morganlewis.com

Counsel for STP Nuclear Operating Company