UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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 and 52-026
Southern Nuclear Operating Company, Inc.	)	
	)	ASLBP No. 09-873-01-COL-BD01
Vogtle Electric Generating Plant,	)	
Units 3 and 4	)	March 25, 2010
	)	

JOINT INTERVENORS' RESPONSE TO SOUTHERN NUCLEAR OPERATING COMPANY'S MOTION TO EXCLUDE PORTIONS OF JOINT INTERVENORS' RESPONSE TO MOTION FOR SUMMARY DISPOSITION OF CONTENTION SAFETY-1 OR, IN THE ALTERNATIVE, FOR LEAVE TO REPLY

I. INTRODUCTION

In accordance with 10 C.F.R. §§ 2.1205 and 2.323, and the schedule provided by the Atomic Safety and Licensing Board (the "Board") in the Order (Schedule for Responses to Motion to Exclude or for Leave to Reply; Request for Notice Regarding Issuance of Advanced Safety Evaluation Report Chapter) dated March 16, 2010, Joint Intervenors[1] submit this opposition to Southern Nuclear Operating Company's Motion to Exclude Portions of Joint Intervenors' Response to Motion for Summary Disposition of Contention Safety-1 or, in the Alternative, for Leave to Reply filed on March 15, 2010 (the "Motion to Strike").

Since Southern Nuclear Operating Company ("SNC") has chosen to argue in the alternative, requesting either leave to reply or to strike portions of Joint Intervenors' Response to

[1] Joint Intervenors include Atlanta Women's Action for New Directions, Blue Ridge Environmental Defense League, Center for a Sustainable Coast, Savannah Riverkeeper, and Southern Alliance for Clean Energy.

Motion for Summary Disposition of Contention Safety-1 dated March 4, 2010 ("Response to Motion for Summary Disposition"), Joint Intervenors will address each of these motions in turn. For the reasons set forth below, each of these motions should be denied.

II. BACKGROUND

On March 28, 2008, SNC submitted an application for a combined license ("COLA") for Units 3 and 4 at the Vogtle Electric Generating Plant (the "Vogtle Site"). Joint Intervenors petitioned for intervention in the proceeding on November 17, 2008, and the Board admitted contention Safety-1 on March 5, 2009. As originally admitted, Safety-1 was a contention of omission.

As a result of additional information provided by SNC regarding the subject matter of Safety-1, Joint Intervenors filed a Motion to Amend Contention Safety-1 on October 23, 2009. This amended contention, reflecting the inadequacy of information provided by SNC, was admitted by the Board on January 8, 2010.

On January 29, 2010, SNC moved for summary disposition of contention Safety-1 and attached a statement of undisputed facts;[2] NRC Staff ("Staff") supported this motion in a brief dated February 12, 2010.[3] In order to address arguments made by SNC in its motion for summary disposition and to dispute the "undisputed" facts, Joint Intervenors filed a response on March 4, 2010.[4] To support this response, Joint Intervenors attached the Joint Declaration of Arjun Makhijani and Diane D'Arrigo in Support of Intervenors' Opposition to Motion for Summary Disposition of Contention Safety-1 (the "Joint Declaration").

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[2] Southern Nuclear Operating Company's Motion for Summary Disposition of Contention Safety-1 ("SNC's Motion for Summary Disposition") dated January 29, 2010.
[3] NRC Staff Answer in Support of Southern Nuclear Operating Company's Motion for Summary Disposition of Contention Safety-1, ("NRC Staff Answer") dated February 12, 2010.
[4] Response to Motion for Summary Disposition.

Then, although reply briefs are "clearly discourage[d]" in the context of summary disposition,[5] and after conceding that motions to strike are a form preferred even less than a reply,[6] SNC none-the-less filed its Motion to Strike on March 25, 2010. It is to this motion that Joint Intervenors now respond.

III. SNC'S Motion to Strike is inappropriate in this context.

Because this Board has already ruled that a motion to strike is inappropriate in this context, and because matters SNC attempts to strike are within the scope of Safety-1, SNC's Motion to Strike should be denied.

A. Legal standard.

Generally, motions to strike are the proper mechanism for excluding information that is deemed irrelevant.[7] However, in the summary disposition context the Board is not obligated to rely upon any information that is outside of the scope of the contention.[8] Therefore, a motion to strike is not appropriate when requested for the sole purpose of excluding information that the movant deems "outside the scope of the [] admitted contention."[9]

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[5] In the Matter of Southern Nuclear Operating Company (Early Site Permit for Vogtle ESP Site), Memorandum and Order (Ruling on Dispositive Motion and Associated Motions to Strike and to Supplement the Record Regarding Environmental Contention 1.3), LBP-08-3, 67 N.R.C. 85, 98 n. 7 (2008) ("ESP 1.3 Order on Motion to Strike") ("[T]he current procedural rule governing summary disposition . . . clearly discourages the filing of replies to summary disposition responses.").

[6] Southern Nuclear Operating Company's Motion to Exclude Portions of Joint Intervenors' Response to Motion for Summary Disposition of Contention Safety-1 or, in the Alternative, for Leave to Reply, ("Motion to Strike") dated March 15, 2010 at 1 n. 2.

[7] *See* Private Fuel Storage (Independent Spent Fuel Storage Installation), LBP-05-20, 62 N.R.C. 187, 228 (2003). As illustrated by the support SNC used in the Motion to Strike, it has been that held motions to strike can be the correct response to additional information provided within a reply brief at the initial admission of a contention phase. Motion to Strike at 4 n. 11 *citing* In re Northern States Power Co. (Prairie Island Nuclear Generating Plant, Units 1 and 2), LBP-08-26, 68 NRC 905, 918-19, 950 (2008).

[8] NRC Staff Answer at 4.

[9] *See* ESP 1.3 Order on Motion to Strike at 97 ("[I]n the context of a summary disposition order we do not consider a 'motion to strike' to be the appropriate vehicle for raising the argument posited by both SNC and the staff here."); Motion to Strike at 1, n. 2 ("[T]he granting of this motion will not result in the actual expungement of material from the record because it could become relevant in a subsequent appeal.").
Motions to strike may be appropriate in the context of summary disposition to exclude "portions of a filing or affidavit that contain technical arguments based on questionable competence" *Private Fuel Storage* (Independent Spent Fuel Storage Installation), LBP-05-20, 62 N.R.C. 187, 228 (2003), however, SNC does not argue that this is the case. *See generally* Motion to Strike.

B. This Board has previously ruled that a motion to strike is not appropriate in a similar context.

This Board has already entertained similar arguments by SNC in the Vogtle Early Site Permit ("ESP") proceeding, and found them unpersuasive. There also, SNC argued that Joint Intervenors "attempt[ed] to expand the scope of [the contention]."[10] As the Board resolved the issues at contention, it stated that "in the context of a summary disposition motion we do not consider a 'motion to strike' to be the appropriate vehicle for raising [arguments regarding the scope of the contention or the adequacy of materials provided]."[11] This is because these "are matters that the Board can consider and resolve without such a motion and without 'striking' anything."[12]

SNC's argument here is noticeably similar to its failed argument in the ESP proceeding: "[Joint Intervenors]' Response raises new issues that are neither within the scope of the original admitted contention nor the subject of an amended or supplemental contention." Just as in the ESP proceeding, here the motion to strike is inappropriate because the information that SNC seeks to strike is not outside the scope of the contention. And, in the event that any information does exceed the scope of the contention, Joint Intervenors reassert their previously stated confidence in the Board to decide the motion for summary disposition based only upon admissible evidence and arguments within the scope of Safety-1. In addition, since the information SNC seeks to strike cannot actually be stricken from the record,[13] its Motion to Strike's stated purpose cannot be accomplished.

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[10] *See generally* Southern Nuclear Operating Company's Motion to Strike or in the Alternative for Leave to Reply to Joint Intervenors' Answer Opposing Southern Nuclear Operating Co.'s Motion for Summary Disposition of Environmental Contention 1.3, dated November 23, 2007.
[11] ESP 1.3 Order on Motion to Strike at 97.
[12] *Id.*
[13] *Id.*

SNC attempts to circumnavigate the rules by filing a brief that impermissibly replies to Joint Intervenors' Response to Motion for Summary Disposition without leave from the Board. While Joint Intervenors acknowledge that SNC has seemingly attempted to cure this deficiency by styling its Motion to Strike as a motion for leave to reply in the alternative, its second request is also deficient, as discussed below.[14]

C. SNC's Motion to Strike is inappropriate because the information it seeks to strike is relevant to the admitted contention.

SNC's motion is also inappropriate because the information presented by Joint Intervenors is relevant and within the scope of Safety-1. Complaining that three categories of information – off-site storage, off-site disposal, and general statements concerning on-site storage – are outside of the scope of the contention and amount to a new or amended contention, SNC argues that this information should be stricken. However, each of these categories of information – and the statements supporting them – are well within the scope of Safety-1.

The availability of off-site disposal is relevant to the admitted contention because the contention is based upon Joint Intervenors' belief, which SNC contends, that it is not.[15] Joint Intervenors have included discussion regarding the current unavailability of off-site disposal to underscore the need for a detailed plan at this point.[16] Therefore, Joint Intervenors' arguments regarding off-site disposal, including Joint Declaration paragraphs 4 – 7 and 16 –19, are within the scope of Safety-1.

Additionally, off-site storage is relevant to the admitted contention because SNC's proposed plans described in its Final Safety Analysis Report ("FSAR") include long-term interim

[14] *See* Section IV., *infra*.
[15] *See* Memorandum and Order (Ruling on Motion to Amend Contention), dated Jan. 8, 2010 at 2 ("SNC's COLA is incomplete because the FSAR fails to provide adequate detail as to how SNC will comply with NRC regulations governing storage of LLRW *in the event an off-site waste disposal facility remains unavailable when VEGP Units 3 and 4 begin operations* in that it does not contain the following information.").
[16] *See* Joint Declaration at ¶ 16 ("Currently, there is no LLRW disposal facility that can accept Class B and C radioactive waste from Plant Vogtle.").

storage as an alternative to on-site storage.[17] However, due to current uncertainty regarding off-site storage capacity and ability for facilities to accept such storage, on-site storage is necessary. This is described in paragraphs 8 – 15 of the Joint Declaration.

Finally, Joint Intervenors' general statements regarding on-site storage are used to support Safety-1 by illustrating the importance of detailed plans. As shown by previous cases of on-site storage, there are inherent safety risks in on-site storage that could result in significant problems.[18] SNC must provide plans that are sufficient to allow the Staff to assess this risk and to ensure such problems do not occur at the Vogtle Site. Joint Declaration's paragraphs 20 – 24, addressing past examples of off-site storage, are therefore within the scope of Safety-1.

D. Regardless of SNC's interpretation of this contention's permissible scope, as a matter of fairness Joint Intervenors should have the opportunity to respond to SNC's arguments.

Even if SNC is correct in its interpretation of Safety-1 's parameters, as a matter of fairness SNC should not be allowed to discuss certain issues and then prevent Joint Intervenors from providing a response to those issues.[19] With its Motion to Strike, SNC is attempting to prevent Joint Intervenors from addressing certain information presented in its motion for Summary Disposition.[20] As discussed above, this information concerns off-site disposal, off-site storage capacity, and the amount of detail necessary to SNC's on-site storage plans.[21]

First, SNC argues that on-site storage should be "interim" only, so detailed plans are not necessary.[22] However, many of the quotes and citations SNC uses have a basic underlying

[17] *See* Statement of Undisputed Facts ¶¶ 9, 15.
[18] *See* Joint Declaration at ¶¶ 20-21.
[19] *See* ESP 1.3 Order on Motion to Strike at 98, n. 8. ("Nonetheless, if a movant discusses a matter in its statement of undisputed facts, it would not be untoward for the Board to view with skepticism any later argument by that movant that a response regarding that issue is outside the scope of the contention, particularly given the onus that is placed upon an opposing party to respond to such a statement.")
[20] *See generally*, Motion to Strike.
[21] *Id.*
[22] *See* Motion for Summary Disposition at 11.

assumption that a disposal path will be available to applicants. Discussion regarding off-site disposal in the Joint Declaration paragraphs 4 – 7 and 16 – 19 is intended to show that reliance on this underlying assumption is flawed.

Second, SNC repeatedly asserts that on-site storage is a contingency plan and that off-site storage is the preferred method of storage for low-level radioactive waste.[23] SNC provides certain facts in its statement of "undisputed" facts intended to suggest that Waste Control Specialists, Inc. ("WCS") and Studsvick will be able to provide adequate off-site storage for the Vogtle Site.[24] Paragraphs 8 – 15 of the Joint Declaration illustrate that there are no facilities currently licensed to accept Class B and C waste, nor are there likely to be at the time Vogtle Units 3 and 4 start operation.[25]

Last, SNC repeatedly asserts that enough detail was already provided within the FSAR to fulfill obligations under 10 CFR parts 52 and 20.[26] Joint Intervenors responded by showing why detailed information is necessary in SNC's FSAR – through other sites with significant safety information, which is contained in paragraphs 20 – 24 of the Joint Declaration – for the Staff to evaluate on-site storage plans.

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[23] *See id*.
[24] *See* Statement of Undisputed Facts at ¶¶ 10-14.
[25] *Compare, e.g.,* SNC's Motion for Summary Disposition at p. 17 ("Off-site options are expected to be available") *and* SNC's Statement of Undisputed Facts in Support of Motion For Summary Disposition of Contention Safety-1 ("SNC's Statement of Undisputed Facts") at Proposed Statement 9 ("Vendor services are available to process Class A, B, and C waste and transfer for storage of that material until a disposal site is available. Currently, [WCS] of Texas is available to store Class A, B, and C material pending the availability of a licensed disposal site.") *with* Joint Declaration of Arjun Makhijani and Diane D'Arrigo at ¶¶ 4-19 ("Based on the facts and available data, we conclude that the assumption that off-site storage space will be available for the new reactors for the license period or anything close to it at WCS is unwarranted;" "Thus even if Studsvik takes title to the LLRW, it has the right to send it back to the generator and, in any event, may not keep it for more than a year.").
[26] *See* Statement of Undisputed Facts, Proposed Statements 6, 15, 16.

IV. SNC'S MOTION FOR LEAVE TO REPLY DOES NOT GIVE THE BOARD ADEQUATE BASIS FOR GRANTING A LEAVE TO REPLY.

In addition to requesting that this Board strike portions of the Response to Motion for Summary Disposition, SNC alternatively requests that this Board grant it leave to reply to that same opposition. However, aside from stating the legal requirements for a leave to reply, SNC's brief does not support such a ruling under the applicable legal standard.

A. Legal standard for leave to reply.

Under 10 C.F.R. § 2.323(c), there is no right for a moving party to submit a reply brief. In order for a party to file a reply, the Board must first grant approval to that party.[27] Board approval of leave to reply is only appropriate in "compelling circumstances."[28]

The regulation provides for "compelling circumstances" in instances "such as where the moving party demonstrates that it could not reasonably have anticipated" arguments made in opposition to the motion.[29] This demonstration of "compelling circumstances" is a high standard to reach, but has been granted in the past in situations where a movant was "forced to shoot in the dark" in its original motion, or suggested in summary disposition briefing where an answer included "plainly and factually incorrect" allegations about basic facts.[30]

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[27] 10 C.F.R. § 2.323.

[28] 10 C.F.R. § 2.323. *See also* In the Matter of U.S. Department of Energy (High-Level Waste Repository), 67 N.R.C. 386, (June 2008) (describing 10 C.F.R. § 2.323(c) as setting "strict conditions" that must be met).

[29] 10 C.F.R. § 2.323; *See also*, In the Matter of Entergy Nuclear Vermont Yankee, LLC, And Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station), 62 N.R.C. 828, 838 (Dec. 2005) (stating repeatedly that there is no right to reply, but granting leave to reply due to "compelling circumstances" where an applicant had produced such a "skimpy" privilege log that the moving party was "forced to shoot in the dark" and therefore "could not reasonably have anticipated" the privilege claimant's arguments).

[30] In the Matter of Entergy Nuclear Vermont Yankee, LLC, And Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station), 62 N.R.C. 828, 838 (Dec. 2005); *See* Enterqy Nuclear Vermont Yankee, L.L.C., and Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station), LBP-06-5, 63 NRC 116, 123 n.10 (2006) (suggesting that if the "allegation" that Entergy had received an earlier copy of a document "was plainly and factually incorrect, Entergy could have requested the opportunity to respond and to correct the record."); *C.f. id.* at 122 ("Factual disputes [between experts] are to be resolved at an evidentiary hearing, where the Board has the opportunity to examine witnesses, probe the documents, and weigh the evidence.").

As a general rule, and as discussed in the Order from the ESP proceeding, replies in support of summary disposition are "clearly discourage[d]."[31]

B. SNC has failed to demonstrate that it could not have reasonably anticipated Joint Intervenors' arguments.[32]

In order for the Board to rule in favor of SNC's request for leave to reply, SNC must have shown that there were compelling circumstances. In attempt to fulfill this requirement, SNC briefly discusses the requirements of 10 C.F.R. § 2.323(c), asserting that there are "compelling circumstances" because Joint Intervenors' arguments "are outside the scope of the contention" and therefore SNC could not have "reasonably anticipated" these arguments.[33] However, instead of elaborating on why arguments outside of the scope of the contention should be considered compelling circumstances, SNC's discussion instead turns to arguments to strike portions of the Joint Declaration.[34]

SNC's rationale supporting its leave to reply is not compelling. As discussed above, Joint Intervenors' arguments and the Joint Declaration fall within the scope of contention Safety-1.[35] Further, since Joint Intervenors were responding to arguments made in SNC's Motion for Summary Disposition, SNC was not shooting in the dark.[36] Rather, SNC should have reasonably anticipated a response to its allegations. Regardless, even if the statements made by Joint

[31] ESP 1.3 Order on Motion to Strike at 97, n. 7 ("[T]he current procedural rule governing summary disposition . . . clearly discourages the filing of replies to summary disposition responses.").
[32] Inability to reasonably anticipate Joint Intervenors' arguments is the only "compelling circumstance" that SNC chooses to address. Since SNC does not argue that Joint Intervenors have presented facts that are so plainly and factually incorrect as to compel reply, Joint Intervenors do not further address that rationale.
[33] Motion to Strike at 5-6.
[34] *See* SNC's Motion to Strike at Attachment A.
[35] *See* Section III.C., *supra.*
[36] *See* In the Matter of Entergy Nuclear Vermont Yankee, LLC, And Entergy Nuclear Operations, Inc. (Vermont Yankee Nuclear Power Station), 62 N.R.C. 828, 838 (Dec. 2005); *Compare, e.g.,* SNC's Statement of Undisputed Facts at ¶ 11 ("[WCS] owns and operates a storage and disposal facility located near Andrews, Texas. WCS is currently licensed by the Texas Commission for Environmental Quality ("TCEQ") (License #R04971) to accept for processing and storage of Class A, B, and C wastes from entities outside of Texas.") *with* Joint Affidavit ¶¶ 9-14 (discussing the lapse and limitations on WCS's license).

Intervenors do fall outside of the scope of Safety-1, the Board can simply ignore them.[37] There is no compelling reason to reply to statements that can instead be disregarded. Because SNC has failed to show that the circumstances are so compelling as to require a reply, the request for leave to reply found in the Motion to Strike should be denied.

V. CONCLUSION

For the foregoing reasons, Joint Intervenors respectfully request that the Board deny SNC's Motion to Strike.

Respectfully submitted this 25th day of March, 2010.

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[37] *See* III.A., *supra*.

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Before the Licensing Board:

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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	)	March 25, 2010

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **JOINT INTERVENORS' RESPONSE TO SOUTHERN NUCLEAR OPERATING COMPANY'S MOTION TO EXCLUDE PORTIONS OF JOINT INTERVENORS' RESPONSE TO MOTION FOR SUMMARY DISPOSITION OF CONTENTION SAFETY-1 OR, IN THE ALTERNATIVE, FOR LEAVE TO REPLY** was served upon the following persons by Electronic Information Exchange and/or electronic mail.

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