

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

May 3, 2010 (10:15am)

In the matter of
Entergy Corporation
Pilgrim Nuclear Power Station
License Renewal Application

Docket # 50-293 OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

May 3, 2010

**Pilgrim Watch Request for Information Relating to Previous Disclosures
And Request for Additional Information**

On April 29, 2010, Entergy's expert witness, Fred Mogolesko, provided a supplemental disclosure and affidavit in which he said that, "To the best of my knowledge, information and belief, Entergy's twelfth Supplemental Disclosure in this above captioned proceeding discloses all materials required to be disclosed by 10 CFR 2.336(a) that were developed, obtained or identified subsequent to the previous disclosures as being relevant to the admitted contentions."

The materials previously disclosed were provided by Entergy to Pilgrim Watch on more than half a dozen CD discs, each of which contains a number of pdf files of varying length. There discs have no index identifying what each contains; individual pages are simply sequentially numbered by Bates number, and each disc contains a mixture of files pertaining to both Contention 1 and Contention 3. For example CD 1 contains 72 files and a total over 35,000 pages.

Thus, the manner in which these materials were provided does not make them usable in any real sense, places an undue burden on Pilgrim Watch, and, we believe, is contrary to instructions on disclosures provided by Chief Judge Young.

At the beginning of this process, Judge Young provided instructions for disclosures. In essence, Judge Young directed that disclosures should be "user friendly" and straightforward.

Pilgrim Watch complied. We ask that Judge Young review this issue at the upcoming scheduling call, May 4. We also ask that Entergy be required to provide a file-by-file index that clearly identifies the title (if any) and subject matter of each file and document on each disc, and, the corresponding Bates label range for that document.

In addition, Pilgrim Watch requests the following further disclosures be made, on discs that are clearly indexed as outlined above.

1. The machine-readable MACCS2 input files used for the Pilgrim SAMA analysis as described in Appendix E where the site-specific inputs used, and their basis for selection, as discussed by Entergy. The MACCS2 input files should include the following: 1) ATMOS input file, 2) meteorological data file, 3) EARLY input file, 4) site data file, and 5) CHRONC input file.
2. The output, i.e., the .OUT file generated by MACCS2 from those inputs.
3. Any and all engineering work sheets or other documents which describe how, and the bases (including any technical papers that support the procedure used by Entergy) upon which, each of the five MACCS2 input files requested above were prepared. To the extent that any of this has been previously disclosed, please indicate precisely on which disc and provide the title of the file and Bates number range.
4. Any and all written descriptions and other documents relating to how the above meteorological data file was prepared from site weather tower and how the 15-minute weather-tower data required by Reg. Guide 1.23 was converted to the 60-minute basis required by MACCS2, including a description of any averaging of wind direction and winds-speed that was performed.

Thank-you for your cooperation,

Mary Lampert
Pilgrim Watch, pro se
148 Washington Street
Duxbury, MA 02332

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket # 50-293-LR

Entergy Corporation

Pilgrim Nuclear Power Station

License Renewal Application

May 3, 2010

CERTIFICATE OF SERVICE

I hereby certify that Pilgrim Watch Request for Information Relating to Previous Disclosures and Request for Additional Information was served May 3, 2010 in the above captioned proceeding to the following persons by electronic mail this date, followed by deposit of paper copies in the U.S. mail, first class.

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May 3, 2010

Hearing Docket

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Sent: Monday, May 03, 2010 10:15 AM
To: Jones, Andrea; Young, Ann; Newell, Brian; David Lewis; Roth(OGC), David; Harris, Brian; Docket, Hearing; 'Jason Parker'; Kevin Nord; Regner, Lisa; Simon, Marcia; Mark Stankiewicz (Plymouth); Matthew Brock; OCAAMAIL Resource; Abramson, Paul; paul.gaukler@Pillsburylaw.com; Cole, Richard; Richard MacDonald; Sheila Hollis(PlyAttorney); Uttal, Susan; 'Terence Burke'
Subject: Pilgrim Watch Request for Information Relating to Previous Disclosures and Request for Additional Information and Certificate of Service
Attachments: PW request Disclosure 05 03 10.docx; Certificate Service PW Request for Information Relating to Previous Disclosures and Request for Additional Information 05.03.10.doc

Hello

Please find, Pilgrim Watch Request for Information Relating to Previous Disclosures and Request for Additional Information and Certificate of Service. If you have difficulty in opening these documents, please call.

Thank-you and have a good day.

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781-934-0389

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X-fn: PW request Disclosure 05 03 10.docx;

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Disclosures and Request for Additional Information 05.03.10.doc

X-IronPort-Anti-Spam-Filtered: true

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Subject: Pilgrim Watch Request for Information Relating to Previous Disclosures and Request
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Date: Mon, 3 May 2010 10:14:56 -0400

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