pillsbury

DOCKETED
USNRC

June 10, 2010 (10:11a.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Pillsbury Winthrop Shaw Pittman LLP
2300 N Street, NW | Washington, DC 20037-1122 | tel 202.663.8000 | fax 202.663.8007

June 10, 2010

Paul A. Gaukler
Phone: 202.663.8304
paul.gaukler@pillsburylaw.com

BY FEDERAL EXPRESS

Ms. Mary Lampert
148 Washington Street
Duxbury, MA 02332

Dear Ms. Lampert:

Thank you for your Sixth Supplemental Disclosure which we received Monday. We note, however, that your disclosure did not identify any experts or other persons upon whom Pilgrim Watch may rely as witnesses at hearing. At the May 4 telephone conference with the Board, you identified several persons that Pilgrim Watch intends to use as witnesses at the hearing. The Commission's disclosure regulation, 10 CFR § 2.336(a)(1), requires a party to identify "any person, including any expert, upon whose opinion the party bases its claims and contentions and may rely upon as a witness, and a copy of the analysis or other authority upon which that person bases his or her opinion." In view of this requirement and your representations to the Board, we would have expected your Sixth Supplemental Disclosure Statement to provide the identity and the related information for the witnesses you identified to the Board in the May 4 telephone conference. We look forward to receiving that information.

Also, we note that your disclosure was not accompanied by a sworn affidavit, as required by 10 CFR § 2.336(c), that "all relevant materials . . . have been disclosed, and that the disclosures are accurate and complete." We request that you provide such a certification as required by the Commission's rules.

Sincerely,

Paul Gaukler
Counsel for Entergy

cc: Service List

From:	Gaukler, Paul A. [paul.gaukler@pillsburylaw.com]
Sent:	Thursday, June 10, 2010 10:11 AM
To:	mary.lampert@comcast.net
Cc:	Docket, Hearing; OCAAMAIL Resource; Young, Ann; Cole, Richard; Abramson, Paul; Uttal, Susan; Jones, Andrea; Harris, Brian; Dreher, Michael; msylvia@townhall.plymouth.ma.us; nord@town.duxbury.ma.us; macdonald@town.duxbury.ma.us; sshollis@duanemorris.com; Martha.Coakley@state.ma.us; Matthew.Brock@state.ma.us; Mitchell, Matilda; Solomakos, Matina; Tucker, Katie; Glew, William (Enexus); Cho, Jeanne; Lewis, David R.
Subject:	Letter regarding Pilgrim Watch Sixth Supplemental Disclosure -- Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. (Pilgrim Nuclear Power Station), Docket No. 50-293-LR, ASLBP No. No. 06-848-02-LR
Attachments:	Letter to M. Lampert (6-10-10) re 6th Supplemental Disclosure.pdf

Mary, attached is a letter regarding Pilgrim Watch's Sixth Supplemental Disclosure that we are sending out this morning. We look forward to hearing from in regard to the letter.

Paul Gaukler
Counsel for Entergy

<<Letter to M. Lampert (6-10-10) re 6th Supplemental Disclosure.pdf>>

Paul Gaukler | Pillsbury Winthrop Shaw Pittman LLP

Tel: 202.663.8304 | Fax: 202.663.8007 | Cell: 301.602.5881
2300 N Street, NW | Washington, DC 20037-1122
Email: paul.gaukler@pillsburylaw.com
www.pillsburylaw.com

Received: from mail1.nrc.gov (148.184.176.41) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.1.393.1; Thu, 10 Jun 2010
10:11:08 -0400
X-Ironport-ID: mail1
X-SBRS: 5.3
X-MID: 15813989
X-fn: Letter to M. Lampert (6-10-10) re 6th Supplemental Disclosure.pdf
X-IronPort-Anti-Spam-Filtered: true
X-IronPort-Anti-Spam-Result:
AjoCAFOPEEzM4/YRmWdsb2JhbACSUYVhhioVAQEBAQEICwoHESK+RIJzgiUE
X-IronPort-AV: E=Sophos;i="4.53,398,1272859200";
 d="pdf'?scan'208,217";a="15813989"
Received: from dcemf02.pillsburywinthrop.com ([204.227.246.17]) by
 mail1.nrc.gov with ESMTP; 10 Jun 2010 10:11:07 -0400
Received: from [172.16.2.11] by dcemf02.PillsburyWinthrop.com with ESMTP
 (DCPWSP SMTP Relay (Email Firewall v6.3.2)); Thu, 10 Jun 2010 10:10:54 -0400
X-Server-Uuid: 9BA6C334-D0DE-48DE-8906-DFAF2974D549
Received: from DW2XM02.PillsburyWinthrop.com ([172.16.2.60]) by
 dcxims01.PillsburyWinthrop.com with Microsoft SMTPSVC(6.0.3790.4675); Thu, 10
 Jun 2010 10:10:54 -0400
X-MimeOLE: Produced By Microsoft Exchange V6.5
Content-Class: urn:content-classes:message
MIME-Version: 1.0
Subject: Letter regarding Pilgrim Watch Sixth Supplemental Disclosure --
 Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc.
 (Pilgrim Nuclear Power Station), Docket No. 50-293-LR, ASLBP No. No.
 06-848-02-LR
Date: Thu, 10 Jun 2010 10:10:53 -0400
Message-ID:
<47CAB5EECBE89F4280DD8914EBD6FCFD6DBF5B@DW2XM02.PillsburyWinthrop.com>
In-Reply-To:
<75EFF893C27E8740A74481F0AA3508599FF4FDCF@DW2XM02.PillsburyWinthrop.com>
X-MS-Has-Attach:
X-MS-TNEF-Correlator:
Thread-Topic: Letter regarding Pilgrim Watch Sixth Supplemental
 Disclosure -- Entergy Nuclear Generation Company and Entergy Nuclear
 Operations, Inc. (Pilgrim Nuclear Power Station), Docket No. 50-293-LR,
 ASLBP No. No. 06-848-02-LR
Thread-Index:
Acd3nmP8O80kZKQ7QJuSKxUg6F8sJgV9w1gQBujy/hAFfaw7cAWFbFSAhiUljUAAAeauAAAu
0xBwA1n0ayADWJCmUAAJiNTQAUT0qwA=
References:
<75EFF893C27E8740A74481F0AA3508599FF4FDCF@DW2XM02.PillsburyWinthrop.com>
From: "Gaukler, Paul A." <paul.gaukler@pillsburylaw.com>

To: mary.lampert@comcast.net
CC: hearingdocket@nrc.gov,
        ocaamail@nrc.gov,
        Ann.Young@nrc.gov,
        Richard.Cole@nrc.gov,
        Paul.Abramson@nrc.gov,
        susan.uttal@nrc.gov,
        andrea.jones@nrc.gov,
        brian.harris@nrc.gov,
        "Dreher, Michael" <Michael.Dreher@nrc.gov>,
        msylvia@townhall.plymouth.ma.us,
        nord@town.duxbury.ma.us,
        macdonald@town.duxbury.ma.us,
        sshollis@duanemorris.com,
        Martha.Coakley@state.ma.us,
        Matthew.Brock@state.ma.us,
        "Mitchell, Matilda" <MMitchell@duanemorris.com>,
        Matina.Solomakos@nrc.gov,
        Katie.Tucker@nrc.gov,
        "Glew, William (Enexus)" <william.glew@enexusenergy.com>,
        "Cho, Jeanne" <jcho91@entergy.com>,
        "Lewis, David R." <david.lewis@pillsburylaw.com>
Return-Path: paul.gaukler@pillsburylaw.com
X-OriginalArrivalTime: 10 Jun 2010 14:10:54.0696 (UTC)
 FILETIME=[BD7E5E80:01CB08A6]
X-WSS-ID: 600E2DE42O894304-01-01
Content-Type: multipart/mixed;
        boundary="----_=_NextPart_001_01CB08A6.BD014246"