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DOCKETED  
USNRC

October 21, 2010 (8:00am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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October 20, 2010

**BY FEDERAL EXPRESS**

Ms. Mary Lampert  
148 Washington Street  
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Dear Ms. Lampert:

Thank you for your Seventh Supplemental Disclosure which we received last week. We note, however, that your disclosure did not identify any experts or the bases of their expected testimony as required by 10 CFR § 2.336(a)(1). We ask that you please provide Pilgrim Watch's witness list and the relied upon bases of your experts in accordance with 10 CFR § 2.336(a)(1). Also, we note that your disclosure was not accompanied by a sworn affidavit, as required by 10 CFR § 2.336(c). We also request that you provide such a certification as required by the Commission's rules.

In our letter dated June 10, 2010, we previously asked that Pilgrim Watch proffer its witness list and relied upon bases. In your June 13 response you said "identifying witnesses at this stage ... is premature because the board has not issued an order regarding the scope of the proceeding or the proposed schedule for hearing." You also indicated that Pilgrim Watch would wait to produce a witness list and their relied upon bases until after the Board issues an order that more clearly defines the issues to be heard in this proceeding.

The Commission has since issued a Memorandum and Order that, among other things, clarified the scope of this proceeding (Memorandum and Order, CLI-10-22, Aug. 27, 2010). Further, in two subsequent orders, the Board has clearly defined the scope of this proceeding and set forth a firm schedule for submitting prefiled direct and rebuttal testimony. (Orders, Sept. 2, 2010 and Sept. 23, 2010). The scope of the proceeding is therefore sufficiently defined (with one exception) for the

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identification of witnesses and their relied upon bases.<sup>[1]</sup> As such, we look forward to receiving this information in the near future.

Finally, your Sixth and Seventh Supplemental Disclosures included a number of documents that are either not easily accessible on the internet or are large documents for which citations are necessary. We ask that you provide all of the documents listed in Attachment 1 in accordance with 10 CFR § 2.336(a)(2) via email or CD by mail. We also request that you provide specific page citations for the larger documents so noted in Attachment 1 in accordance with 10 CFR § 2.336(a)(2).

Sincerely,

A handwritten signature in black ink that reads "Paul Gaukler". The signature is fluid and cursive, with the first name "Paul" and last name "Gaukler" clearly distinguishable.

Paul Gaukler  
Counsel for Entergy

Enclosure: Attachment 1  
cc: Service List

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<sup>[1]</sup> Entergy does not request that Pilgrim Watch proffer its expected witnesses and their relied upon bases for Pilgrim Watch's averaging practice concerns since the Board has yet to rule on the issue's timeliness and whether the issue is a part of this proceeding.

## ATTACHMENT 1

### 6<sup>th</sup> Supplemental Disclosure

- 1) Angevine, Wayne; Trainer, Michael; McKeen, Stuart; Berkowitz, Carl; Mesoscale meteorology of the New England coast. Gulf of Maine, and Nova Scotia: Overview, JOURNAL OF GEOPHYSICAL RESEARCH, VOL. 101, NO. D22, PP. 28,893-28,901, 1996 doi:10.1029/95JD03271
- 2) Planchon , O; Damato, F; Dubreuil, V; Gouery, P; A method of identifying and locating sea-breeze fronts in north-eastern Brazil by remote sensing April 2006
- 3) Aijun Ding, Tao Wang, Ming Zhao, Tijian Wang and Zongkai Li, Simulation of sea-land breezes and a discussion of their implications on the transport of air pollution during a multi-day ozone episode in the Pearl River Delta of China, Atmospheric Environment Volume 38, Issue 39, December 2004, Pages 6737-6750
- 4) **Copies of applicable pages and page citation required:** Environmental Science and Engineering, J. Glynn Henry & Gary W. Heinke, (Prentice-Hall 1989)
- 5) **Copies of applicable pages and page citation required:** Tracking and Predicting the Atmospheric Dispersion of Hazardous Material Releases Implications for Homeland Security, Committee on the Atmospheric Dispersion of Hazardous Material Releases Board on Atmospheric Sciences and Climate Division on Earth and Life Studies, National Research Council of the National Academies, 2003

### 7<sup>th</sup> Supplemental Disclosure

- 1) Egan, B.A. 1975. "Turbulent Diffusion in Complex Terrain." Lecture notes for the American Meteorological Society Workshop on Meteorology and Environmental Assessment. September-October 1975. Boston, MA.
- 2) Egan, B.A., R. D'Errico, and C. Vaudo. 1978. "Assessing Air Quality Levels in Regions of Mountainous Terrain." World Meteorological Organization Symposium on Boundary-layer Physics Applied to Specific Problems of Air Pollution. June 1978. Norrköping, Sweden.
- 3) Egan, B.A., and R.J. Paine. 1986. "The Rough Terrain Diffusion Model and Its Use with Different Terrains." TAPPI Journal, **69**(12).
- 4) Egan, B.A., and F.A. Schiermeier. 1986. "Dispersion in Complex Terrain: A Summary of the AMS Workshop Held in Keystone, CO, May 19-20." Bull. Amer. Meteorological Society, **67**(10).
- 5) Egan, B.A., and R.J. Paine. 1986. "The Applicability of the Rough Terrain Diffusion Model (RTDM) to Different Terrain Settings." Paper 4-2,

Proceedings of the 1986 TAPPI Environmental Conference. Atlanta, GA.  
TAPPI Press.

- 6) Egan, B. A., and D. Heinold. 1997. "A Guide to EPA's Risk Management Program Under Section 112(r) of the Clean Air Act: Strategies for Effective Compliance." Air and Waste Management Association, Pittsburgh, PA.
- 7) Egan, B.A. and W. H. Snyder. 2001: "Atmospheric Dispersion : Complex Terrain." Chapter in the "Encyclopedia of Environmetrics." John Wiley and Sons, West Sussex, UK.
- 8) Egan, B.A. and B.L. Murphy. 2007: Forensic Air Dispersion Modeling and Analysis. Chapter 12: Introduction to Environmental Forensics. Elsevier Academic Press. London
- 9) Lavery, T.F., A. Bass, B. Greene, R.V. Hatcher, A. Venkatram, and B.A. Egan. 1982. "The Cinder Cone Butte Dispersion Experiment." Third Joint Conference on Applications of Air Pollution Meteorology, San Antonio, TX. Boston, MA. American Meteorological Society.
- 10) Lavery, T.F., B.R. Greene, B.A. Egan, and F.A. Schiermeier. 1983. "The EPA Complex Terrain Model Development Program." Extended Abstracts, Sixth Symposium on Turbulence and Diffusion, Boston, MA. American Meteorological Society.
- 11) Nordo, J., 1974: Quantitative estimates of long range transport of sulphur pollutants in Europe. Ann. Meteor., 9,71-77.
- 12) Paine, R.J., B.A. Egan, M.T. Mills and D.G. Strimaitis. 1987. "Applications of the Complex Terrain Dispersion Model." 80th Annual Meeting of the Air Pollution Control Assoc. NY, NY
- 13) Paumier, J.O., S.G. Perry and D.J. Burns, 1990: CTDMPPLUS: A Dispersion Model for Sources in Complex Topography, Part II: Performance Characteristics, Journal of Applied Meteorology 31(7): 646-660
- 14) Perry, S.G., 1992: A Dispersion Model for Sources Near Complex Topography. Part I: Technical Formulations. Journal of Applied Meteorology, 31(7):633-645
- 15) Srinivas, C.V., R. Venkatsen, A Simulation Study of dispersion of air borne radionuclides from a nuclear power plant under a hypothetical accidental scenario at a tropical coastal site, Nov., 22, 2004, Atmosphereic Environment 39 (2005) 1497-1511, available online at [www.sciencedirect.com](http://www.sciencedirect.com)
- 16) Venkatram, A., D. Strimaitis, D. DiChristofaro, J. Pleim, T. Lavery, A. Bass, and B. Egan. 1982. "The Development and Evaluation of Advanced

Mathematical Models to Simulate Dispersion in Complex Terrain.” Extended Abstracts, Third Joint Conference on Applications of Air Pollution Meteorology, San Antonio, TX. Boston, MA. American Meteorological Society.

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