

October 28, 2010 (8:00am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

October 27, 2010

BY FEDERAL EXPRESS & EMAIL

Paul A. Gaukler
David Lewis
Pillsbury Winthrop Shaw Pitman LLP
2300 N St., Washington DC 20037-1122

Dear Paul and David:

I received Paul Gaukler's October 20 letter in which were raised three issues.

1. **Witness List:**

Mr. Gaukler asked Pilgrim Watch to provide a witness list. We disagree that the scope has been clarified. As you know, Pilgrim Watch filed a Motion with the NRC Commission asking for clarification of the scope on September 22, 2010. The Commission has not yet responded. When the Commission responds, we expect that the scope will become crystal clear; and at that time Pilgrim Watch will enter into contracts with expert witnesses and provide a complete witness list and relied upon bases. We trust this is reasonable.

In the interim, in accordance with 10 C.F.R § 2.336 (a) (1) 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, and a copy of the analysis or other authority upon which that person bases his or her opinion. They include, at this still unclear stage of the proceeding the following:

- Dr. Bruce Egan: Dr. Egan's CV is of record Pilgrim Watch Answer Opposing Entergy's Motion for Summary Disposition of Pilgrim Watch Contention 3, June 2007- Adams Accession Number ML071840568
- David I. Chanin: Mr. Chanin's CV is of record a Pilgrim Watch Answer Opposing Entergy's Motion for Summary Disposition of Pilgrim Watch Contention 3, June 2007- Adams Accession Number ML071840568; and in addition, his CV can be accessed easily on Mr. Chanin's website <http://chaninconsulting.com/index.php>
- Dr. Edwin Lyman: As a consequence of the October 26 Board Order regarding timeliness of the "averaging issue," I have emailed Dr. Lyman and asked for his assistance. When I receive confirmation, I will send his CV. However Dr. Lyman is a Senior Staff Scientist in Global Security Program at the Union of Concerned Scientists with a PhD in physics.

In the interim, Dr. Lyman's biographical information is on Adams at ML100291054
http://wba.nrc.gov:8080/ves/view_contents.jsp

2. Sixth & Seventh Disclosures:

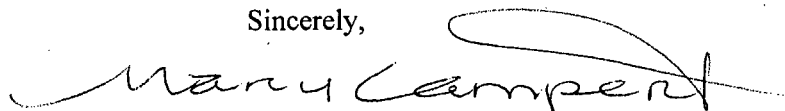
Mr. Gaukler said that a number of documents are either not easily accessible on the internet or are large documents for which citations are thought necessary; therefore, Paul asked for all of the documents in Attachment 1, numbering 16 via email or CD by mail and page citations. Dr. Bruce Egan is out of town and I will ask him for copies upon his return. In the interim, I know that copies of these documents were provided as Exhibits with Dr. Egan's Declaration for the NYAGO in their Motion for Summary Disposition on Contention 16/16A (DPR-26, DPR-64I), August 28, 2009. I unsuccessfully searched Adams and have a request to the staff for the ML numbers. Further, I feel confident that your witness, Steve Hanna, has most of these documents or can easily access them. He is a contemporary of my witness, Bruce Egan. In fact, they have worked together on projects and co-authored reports, as you may know. Therefore I ask that you contact Steve Hanna and then request any documents that he either does not have or cannot easily get. I ask for your patience. Unlike your situation, I do not have any staff, assistance or a copy room.

3. Sworn Affidavit on 7th Disclosure

Last, Mr. Gaukler noted that the Pilgrim Watch's seventh disclosure was not accompanied by a sworn affidavit, citing 10 C.F.R. 2.336 (c). Old habits are hard to break; hopefully a new one has been formed. Pilgrim Watch now provides a supplement to the 7th disclosure with an affidavit and will make every effort to continue in subsequent disclosures. It is attached.

I hope this addresses your concerns

Sincerely,



Mary Lampert

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

Cc: Service list via email

Attachment 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 <http://www.agu.org/pubs/crossref/1996/95JD03271.shtml>

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

<http://journals.cambridge.org/action/displayAbstract?jsessionid=B78822076DEBDD5DB387F9C8138737B8.tomcat1?fromPage=online&aid=465851>

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

http://www.sciencedirect.com/science?_ob=ArticleURL&_udi=B6VH3-4DS8JBR-6&_user=10&_coverDate=12%2F01%2F2004&_rdoc=1&_fmt=high&_orig=search&_sort=d&_docanchor=&view=c&_searchStrId=1356948703&_rerunOrigin=google&_acct=C000050221&_version=1&_urlVersion=0&_userid=10&md5=00e6e91393ee1181620bf3e5d474ba63

Copies Applicable Pages and Pages & Page Citations: 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
<http://www.nap.edu/openbook.php?isbn=0309089263>.

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.

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.

Egan, B.A., and R.J. Paine. 1986. "The Rough Terrain Diffusion Model and Its Use with Different Terrains." TAPPI Journal, 69(12).

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

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.

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

Egan, B.A. and B.L. Murphy. 2007: Forensic Air Dispersion Modeling and Analysis. Chapter 12: Introduction to Environmental Forensics. Elsevier Academic Press. London

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.

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.

Nordo, J., 1974: Quantitative estimates of long range transport of sulphur pollutants in Europe. *Ann. Meteor.*, 9,71-77

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

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

Perry, S.G., 1992: A Dispersion Model for Sources Near Complex Topography. Part I: Technical Formulations. *Journal of Applied Meteorology*, 31(7):633-645

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, *Atmospheric Environment* 39 (2005) 1497-1511, available online at www.sciencedirect.com

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

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

October 13, 2010

CERTIFICATE OF SERVICE

I hereby certify that both Pilgrim Watch's Supplement To Seventh Disclosure Statement and Response to Paul Gaukler's October 27th Letter was served October 27, 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.

Secretary of the Commission
Attn: Rulemakings and Adjudications
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