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February 1, 2011

Via Electronic Mail and Electronic Information Exchange

Secretary  
Att'n: Rulemakings and Adjudications  
Staff  
Mail Stop O-16 C1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Entergy's Rebuttal Testimony

Pursuant to 10 C.F.R. § 2.1207(a)(2) and the Atomic Safety and Licensing Board's ("Board") September 23, 2010 Order<sup>1</sup> setting the schedule for submissions, Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. (collectively, "Entergy") hereby submit their "Rebuttal Testimony of Dr. Kevin R. O'Kula and Dr. Steven R. Hanna on Meteorological Matters Pertaining to Pilgrim Watch Contention 3" (ENT000013).

As requested by the Board's September 23 Order, Entergy is also submitting the "Rebuttal Testimony of Dr. Kevin R. O'Kula on Source Term Used in the Pilgrim Nuclear Power Station SAMA Analysis" (ENT000014) to respond to Pilgrim Watch's response to Board Question No. 2 in the Appendix of that Order concerning the source term used in the SAMA analysis. Entergy's position, however, is that this testimony is not relevant to Contention 3, because Contention 3 does not challenge the source term.

Finally, Entergy also submits its updated exhibit list (Attachment 1) which now includes Entergy's prefiled rebuttal testimony, Exhibits ENT000013 and ENT0000014.

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<sup>1</sup> Order (Confirming Matters Addressed at September 15, 2010, Telephone Conference) (September 23, 2010) ("September 23 Order").

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Sincerely yours,

/Signed electronically by Paul Gaukler/

Paul Gaukler  
Counsel for Entergy

Attachment  
CC: Certificate of Service

ENTERGY HEARING EXHIBIT LIST		
Party Exh. #	Witness/Date	Document Name & Description
ENT000001	Kevin R. O'Kula, Steven R. Hanna Jan. 3, 2011	Testimony of Dr. Kevin R. O'Kula and Dr. Steven R. Hanna on Meteorological Matters Pertaining to Pilgrim Watch Contention 3.
ENT000002	Kevin R. O'Kula, Dec. 2010	Delaration of Kevin R. O'Kula In Support Of Entergy's Pre-Filed Testimony ON Pilgrim Watch Contention 3 and Resume of Kevin R. O'Kula.
ENT000003	Steven R. Hanna, Dec. 2010	Delaration of Steven R. Hanna In Support Of Entergy's Pre-Filed Testimony ON Pilgrim Watch Contention 3 and Resume of Steven R. Hanna.
ENT000004	Steven R. Hanna, Dec. 2010	Analysis of Annual Wind Roses and Precipitation within about 50 Miles of the Pilgrim Nuclear Power Station, and Use of CALMET to Calculate the Annual Distribution of Trajectories from the Pilgrim Station
ENT000005	Kevin R. O'Kula, Steven R. Hanna 2006	License Renewal Application Environmental Report, Section 4.21.
ENT000006	Kevin R. O'Kula, Steven R. Hanna 2006	License Renewal Application Environmental Report, Attachment E.
ENT000007	Kevin R. O'Kula, Steven R. Hanna 2006	LRA Amendment 4, Response to Request for Additional Information Regarding SAMAs, Entergy Letter to NRC Dated July 5, 2006.
ENT000008	Kevin R. O'Kula, Steven R. Hanna 2006	LRA Amendment 7, Response to Request for Additional Information Regarding SAMAs, Attachment D, Entergy Letter to NRC Dated August 30, 2006.
ENT000009	Kevin R. O'Kula, Steven R. Hanna 2006	LRA Amendment 9, Response to Request for Additional Information Regarding SAMAs, Attachment E, Entergy Letter to NRC Dated October 6, 2006.
ENT000010	Kevin R. O'Kula, Steven R. Hanna 2006	LRA Amendment 10, Response to Request for Additional Information Regarding SAMAs, Attachment C, Entergy Letter to NRC Dated December 12, 2006.
ENT000011	Kevin R. O'Kula, Jan. 2011	Exposure Index Analysis Using MACCS2 and CALMET: Sensitivity Study Supporting the Pilgrim Station SAMA Analysis, Revision 1.
ENT000012	Kevin R. O'Kula, Jan. 3, 2011	Testimony of Dr. Kevin R. O'Kula on Source Term Used in the Pilgrim Nuclear Power Station Severe Accident Mitigation Alternatives (SAMA) Analysis
ENT000013	Kevin R. O'Kula, Steven R. Hanna 2011	Rebuttal Testimony of Dr. Kevin R. O'Kula and Dr. Steven R. Hanna on Meteorological Matters Pertaining to Pilgrim Watch Contention 3.
ENT000014	Kevin R. O'Kula, 2011	Rebuttal Testimony of Dr. Kevin R. O'Kula on Source Term Used in the Pilgrim Nuclear Power Station SAMA Analysis.
JNT000001*	Kevin R. O'Kula Steven R. Hanna Oct. 2004	NUREG/CR-6853, Molenkamp et al., Comparison of Average Transport and Dispersion Among a Gaussian, a Two-Dimensional, and a Three-Dimensional Model.

\* Submitted by the NRC Staff.

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
Entergy Nuclear Generation Company and	)	Docket No. 50-293-LR
Entergy Nuclear Operations, Inc.	)	ASLBP No. 06-848-02-LR
	)	
(Pilgrim Nuclear Power Station)	)	

CERTIFICATE OF SERVICE

I hereby certify that the “Rebuttal Testimony of Dr. Kevin R. O’Kula and Dr. Steven R. Hanna on Meteorological Matters Pertaining to Pilgrim Watch Contention 3” and the “Rebuttal Testimony of Dr. Kevin R. O’Kula on Source Term Used in the Pilgrim Nuclear Power Station SAMA Analysis” were provided to the Electronic Information Exchange for service on the individuals below, this 1<sup>st</sup> day of February, 2011. In addition, a copy of this pleading was provided by email to the persons designated by an asterisk below.

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/Signed electronically by Paul  
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