

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before the Licensing Board:

E. Roy Hawkens, Chair
Dr. Michael F. Kennedy
Dr. William C. Burnett

In the Matter of)
) Docket No. 52-040 and 52-041
Florida Power & Light Company)
)
Combined License Application for)
Turkey Point Units 6 & 7)
_____)

JOINT INTERVENORS' INITIAL MANDATORY DISCLOSURES

Pursuant to 10 C.F.R. § 2.336 and the Atomic Safety and Licensing Board's March 30, 2011 Initial Scheduling Order and Administrative Directives (the "Disclosure Order"), intervenors, Mark Oncavage, Dan Kipnis, Southern Alliance for Clean Energy, and National Parks Conservation Association (collectively, "Joint Intervenors"), hereby provide the required mandatory disclosures relevant to Joint Intervenors' partially admitted contention, NEPA 2.1.

1. Expert Witnesses and Documents

As of March 31, 2011, and pursuant to 10 C.F.R. 2.336(a)(1) and the Disclosure Order, Joint Intervenors state that they have not identified any person on which they may rely upon as a witness. Pursuant to Joint Intervenors' continuing duty of disclosure under 10 C.F.R. § 2.336(d) and the Disclosure Order, Joint Intervenors will update these disclosures if such persons are identified.

2. Data Compilations or Tangible Things

As of March 31, 2011, and pursuant to 10 C.F.R. 2.336(a)(2) and the Disclosure Order, Joint Intervenors state that they have not identified any documents, data compilations, or tangible things in their possession relevant to the partially admitted contention. As required under 10 C.F.R. § 2.336(d) and the Disclosure Order, Joint Intervenors will update these disclosures if they obtain any relevant documents, data compilations, or tangible things.

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**CERTIFICATION OF JOINT INTERVENORS' INITIAL MANDATORY
DISCLOSURES; AFFADAVIT OF MINDY GOLDSTEIN**

County of DeKalb)
)
State of Georgia)

I, Mindy Goldstein, being duly sworn according to law, depose and state the following:

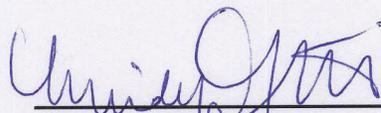
1. I am the Staff Attorney at the Turner Environmental Law Clinic. My business address is 1301 Clifton Road, Atlanta, GA 30322. I am authorized to provide this certification, pursuant to 10 C.F.R. § 2.336(c), on behalf of Mark Oncavage, Dan Kipnis, Southern Alliance for Clean Energy, and National Parks Conservation Association (collectively, "Joint Intervenors").

2. In connection with Joint Intervenors' initial mandatory disclosures in this proceeding, I have overseen the review and classification of all relevant documents being provided by Joint Intervenors.

3. To the best of my knowledge, information, and belief, Joint Intervenors' initial mandatory disclosures, dated April 8, 2011, describe all materials required to be disclosed by 10 C.F.R. § 2.336(a) (as modified by the Atomic Safety and Licensing Board's March 30, 2011 Initial Scheduling Order and Administrative Directives) that were identified as relevant to the partially admitted contention through a search of the information and documentation reasonably available to and under Joint Intervenors' possession, custody, or control.

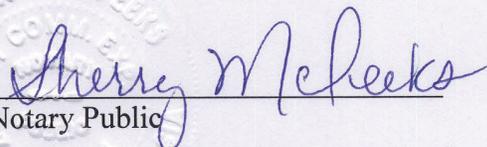
4. Further, to the best of my knowledge, information, and belief, and based on a review of the information and documentation currently reasonably available to and under the possession, custody, or control of Joint Intervenors, these disclosures are accurate and complete as of March 31, 2011.

Further, the affiant sayeth not.



Mindy Goldstein, Esq.
Turner Environmental Law Clinic
Emory University School of Law
1301 Clifton Road
Atlanta, GA 30322
Email: magolds@emory.edu

Subscribed and sworn to before me
this 8 day of April



Notary Public

My commission expires 7/7/14

SHERRY McPECK
NOTARY PUBLIC
DEKALB COUNTY, GEORGIA
MY COMMISSION EXPIRES JULY 7, 2014

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **CERTIFICATION OF JOINT INTERVENORS' INITIAL MANDATORY DISCLOSURES; AFFADAVIT OF MINDY GOLDSTEIN** was served upon the following persons by Electronic Information Exchange and/or electronic mail.

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Dated: April 8, 2011

/signed (electronically) by/
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