

RAS E-532

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.	50-247-LR
)		50-286-LR
ENERGY NUCLEAR OPERATIONS, INC.)		
)		
(Indian Point Nuclear Generating Units 2 and 3))	May 20, 2011	

**HUDSON RIVER SLOOP CLEARWATER, INC.'S
MANDATORY DISCLOSURE UPDATE PURSUANT TO C.F.R. § 2.336**

Pursuant to 10 C.F.R. § 2.336, as amended by the Agreement of the Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 ("Mandatory Disclosure Agreement"), Manna Jo Greene hereby declares as follows:

1. I am the Environmental Director for petitioner-intervenor, Hudson Sloop Clearwater, Inc. ("Clearwater").
2. The accompanying Mandatory Disclosure Update supplement's Clearwater's previous disclosures.
3. To the best of my knowledge, information and belief, Clearwater's Mandatory Disclosure Update is accurate and complete, and transmits all materials required to be disclosed pursuant to 10 C.F.R. § 2.336 and the Agreement of Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 that were identified as relevant to the admitted contentions through a reasonable search of the information and documentation under the possession, control, and custody of Clearwater as of May 20, 2011.
4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 20, 2011.

DOCKETED

May 20, 2011 (3:35 p.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Manna Jo Greene

Manna Jo Greene

TEMPLATE = SECY-026

DS 03

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-247-LR
)	and
)	50-286-LR
ENTERGY NUCLEAR OPERATIONS, INC.)	
)	
(Indian Point Nuclear Generating Units 2 and 3))	
)	May 20, 2011

**HUDSON RIVER SLOOP CLEARWATER, INC.'S
MANDATORY DISCLOSURE UPDATE PURSUANT TO C.F.R. § 2.336**

Pursuant to 10 C.F.R. § 2.336, as amended by the Agreement of the Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 (“Mandatory Disclosure Agreement”), Hudson River Sloop Clearwater (“Clearwater”) hereby makes the following mandatory disclosure update to all parties.

DOCUMENTS

In accordance with 10 C.F.R. § 2.336(a)(2), documents, data compilations, and tangible things (e.g., books, publications, and treatises) in the possession, custody or control of Clearwater that are relevant to the Consolidated Contention are identified in the lists below.

Clearwater incorporates by reference, however, pursuant to the Mandatory Disclosure Agreement, does not list documents already served on the parties in this proceeding, relevant news clippings, and drafts of documents. The following lists also exclude documents for which Clearwater claims a privileged status, although, in accordance with the Mandatory Disclosure Agreement, Clearwater will not produce a

privilege log for documents asserted to be protected from disclosure under attorney work-product and/or attorney-client privileges.

A. Public Documents:

Description	Document Type	Author	Date	Location
Audiolecture regarding Environmental Justice	Website	University of Notre Dame	2/25/2009	http://ocw.nd.edu/center-for-social-concerns/environmental-justice-and-human-rights-in-the-aftermath-of-katrina/lectures/course-schedule
Westchester County Indian Point Emergency Guide 2010-2011	Brochure	Westchester County	2010	Clearwater Office
Seismic Risk at Indian Point Nuclear Generating Station	Letter	Eric T. Schneiderman	3/18/2011	Clearwater Office
Opposition to Nuclear Power Rises Amid Japanese Crisis	Report	The Pew Research Center For the People & the Press	3/21/2011	Clearwater Office

B. Non-public Documents:

Description	Document Type	Author	Date	Location
Email and attachment re: "Invitation to participate in a brief call on Clearwater's Environmental Justice Contention 12/23"	Email	From: Manna Jo Greene To: Various parties	12/17/2010	Clearwater Office
Email re: "Invitation to participate in a brief call on Clearwater's Environmental Justice Contention 12/23"	Email	From: Aaron Mair To: Manna Jo Greene; Various parties	12/18/2010	Clearwater Office
Email re: "Invitation	Email	From: Aaron Mair	12/28/2010	Clearwater

to participate in a brief call on Clearwater's Environmental Justice Contention 12/23"		To: Robert Bullard; Beverly Wright; Ross Gould; Manna Jo Greene		Office
Email and attachment re: "Draft EIS Final EIS Report"	Email	From: Michael Boyajian To: Ross Gould; Stephen Filler; Manna Jo Greene	12/21/2010	Clearwater Office
Email re: "government contacts"	Email	From: Michael Boyajian To: Ross Gould; Stephen Filler; Manna Jo Greene; Richard Webster	1/3/2011	Clearwater Office
Email re: Indian Point Conference Call	Email	From: Robert Bullard To: Ross Gould; Beverly Wright; Aaron Mair; Manna Jo Greene; Richard Webster	1/6/2011	Clearwater Office
Email re: "I must leave for Ramapo at 11"	Email	From: Manna Jo Greene To: Michael Edelstein	1/23/2011	Clearwater Office
Email re: "Can Michael Edelstein come back to speak to your class?"	Email	From: Manna Jo Greene To: Julio Medina Cc: Michael Edelstein Bcc: MJ Wilson; Karla Raimundi; Stephen Filler; Ross Gould; Richard Webster	1/31/2011	Clearwater Office
Email re: "Please contact Julio asap"	Email	From: Manna Jo Greene To: Michael Edelstein Cc: Richard Webster; Ross Gould; Stephen Filler Bcc: MJ Wilson; Karla Raimundi	1/31/2011	Clearwater Office
Email re: "CW's new EJ Contentions ; rapid response needed – pls review and comment today, if possible"	Email	From: Manna Jo Greene To: Aaron Mair; Brian Reid Cc: Various parties	2/3/2011	Clearwater Office

Email re: "Westchester County Indian Point Emergency Guide – pt 1"	Email	From: Stephen Filler To: MJ Wilson Cc: Manna Jo Greene; Ross Gould; Richard Webster; Karla Raimundi; Stephen Filler	2/14/2011	Clearwater Office
Email re: "Westchester County Indian Point Emergency Guide – pt 2"	Email	From: Stephen Filler To: MJ Wilson Cc: Manna Jo Greene; Ross Gould; Richard Webster; Karla Raimundi; Stephen Filler	2/14/2011	Clearwater Office
Email re: "Westchester County Indian Point Emergency Guide – pt 3"	Email	From: Stephen Filler To: MJ Wilson Cc: Manna Jo Greene; Ross Gould; Richard Webster; Karla Raimundi; Stephen Filler	2/14/2011	Clearwater Office
Email re: "Scaled- back participation in Clearwater's Indian Point Environmental Justice Contention"	Email	From: Manna Jo Greene To: Various parties	2/20/2011	Clearwater Office
Email re: "Question about Indian Point/Town of Greenburgh" evacuation plans	Email	Stephen Filler	2/23/2011	Clearwater Office
Email re: Tony Sutton	Email	Stephen Filler	2/23/2011	Clearwater Office
Email re: "Reminders re: Need your times for EJ Litigation call and a call to Bob Bullard"	Email	From: Manna Jo Greene To: Aaron Mair	2/28/2011	Clearwater Office
Email re: "Fwd: Invitation to participate in a brief call on Clearwater's Environmental..."	Email	From: Robert Bullard To: Aaron Mair; B Wright Cc: R Gould; Manna Jo Greene	3/20/2011	Clearwater Office
Email re: "[IPSEC1] Amory Lovins: Learning from Nuclear Disaster"	Email	From: Alice Slater To: Various parties	3/23/2011	Clearwater Office
Email re: "CW-IP: Potential EJ Contact"	Email	From: MJ Wilson To: Manna Jo Greene	3/25/2011	Clearwater Office

C. FOIL Documents:

The following list contains documents in Clearwater's possession, relevant to the Contentions, which were produced or received in connection with FOIL requests by Clearwater.

Description	Document Type	Author	Date	Location
Email re: FOIA request	Email	From: Ross Gould To: FOIA, US Dept. of Homeland Security	7/25/2010	Clearwater Office
Email and attachment re: DES FOIL Request WCF-Tue Jul 20 2010 00:04:51 GMT-0400 (EDT)	Email	From: Ross Gould To: Westchester County Government, Dept. Of Emergency Services	7/19/2010	Clearwater Office
Email and attachment re: Corrections FOIL Request WCF-Mon Aug 16 2010	Email	From: Ross Gould To: Westchester County Government, Dept. Of Emergency Services	8/16/2010	Clearwater Office
Email re: Corrections FOIL Request WCF-Mon Aug 16 2010	Email	From: Justin Pruyne To: Ross Gould	8/18/2010	Clearwater Office
Email re: Corrections FOIL Request WCF-Mon Aug 16 2010	Email	From: Ross Gould To: Justin Pruyne	8/16/2010	Clearwater Office
Email re: Rockland County FOIL Request	Email	From: Rockland County Government, Law Department To: Ross Gould	8/16/2010	Clearwater Office
Email re: Rockland County FOIL Request	Email	From: Rockland County Government, Fire & Emergency Services To: Ross Gould	8/16/2010	Clearwater Office
Email re: Rockland County FOIL Request	Email	From: Rockland County Government, Fire & Emergency Services To: Ross Gould	8/16/2010	Clearwater Office
Email re: Rockland County FOIL Request	Email	From: Rockland County Government, Sheriff To: Ross Gould	8/16/2010	Clearwater Office
Email re: FOIL	Email	From: Daniel Block,	8/23/2010	Clearwater

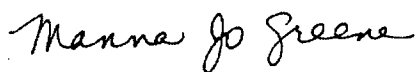
Request		Records Access Officer, County of Rockland Department of Law To: Ross Gould		Office
Email re: Foil Request	Email	From: Halley Bonnie, Records Access Officer, County of Rockland Department of Law To: Ross Gould	1/11/2011	Clearwater Office
Email re: FOIL-HUDSON RIVER SLOOP CLEARWATER, INC.	Email	From: Jeff Fortunato, Chief Ass't County Attorney, County of Rockland To: Ross Gould	9/17/2010	Clearwater Office
Email re: New FOIL Request	Email	From: Vincent Altieri, County of Rockland To: Ross Gould	1/4/2011	Clearwater Office
Email re: New FOIL Request	Email	From: Ross Gould To: Vincent Altieri, County of Rockland	1/4/2011	Clearwater Office
Email re: New FOIL Request	Email	From: Vincent Altieri, County of Rockland To: Ross Gould	1/4/2011	Clearwater Office
Email re: FOIL request re: sing sing	Email	From: Ross Gould To: Susan Shapiro	10/13/2010	Clearwater Office
Email and attachment re: FOIL Request	Email	From: Ross Gould To: FOIL-DES@westchestergov.com , FOIL-PS@westchestergov.com , FOIL-CE@westchestergov.com	1/3/2011	Clearwater Office
Email re: FOIL request	Email	From: FOIL-PS@westchestergov.com To: Ross Gould	1/7/2011	Clearwater Office
Email re: FOIL request	Email	From: Ross Gould To: FOIL-CMHS@westchestergov.com	1/3/2011	Clearwater Office
Email re: FOIL request	Email	From: FOIL-DES@westchestergov.com To: Ross Gould	1/10/2011	Clearwater Office
Email re: FOIL request	Email	From: Ross Gould To: FOIL-Correction@westchest	1/3/2011	Clearwater Office

		ergov.com		
Email re: FOIL request	Email	From: Justin Pruyne To: Ross Gould	1/4/2011	Clearwater Office
Email re: FOIL request	Email	From: Justin Pruyne To: Ross Gould	1/10/2011	Clearwater Office
Email re: Freedom of Information Law request to Putnam County	Email	From: Jennifer Caruso To: Ross Gould	2/22/2011	Clearwater Office
Email re: FOIL	Email	From: Ross Gould To: FOIL-CE@westchestergov.com	1/3/2011	Clearwater Office
Email re: FOIL Request	Email	From: Anthony Morizio, Westchester County Police Records Unit To: Ross Gould	2/4/2011	Clearwater Office
Email re: Foil Request	Email	From: Diane Dicola Leach, Westchester County Dept. of Community Mental Health To: Ross Gould	1/10/2011	Clearwater Office
Letter re: FOIL request	Letter	From: James Purdy; Joseph Payton, Department of Correctional Services, Sing Sing Correctional Facility To: Ross Gould	3/29/2011	Clearwater Office
Letter re: FOIL request	Letter	From: Chad Powell, Department of Correctional Services To: Ross Gould	1/20/2011	Clearwater Office
Letter re: FOIL request	Letter	From: James Purdy & Ricardo Morales, Department of Correctional Services, Sing Sing Correctional Facility To: Ross Gould	1/21/2011	Clearwater Office
Letter re: FOIL request	Letter	From: Chad Powell, Department of Correctional Services To: Ross Gould	1/6/2011	Clearwater Office
Letter re: Freedom of Information Law Received January 7, 2011	Letter	From: Jennifer L. Caurso, Putnam County Deputy County Attorney	2/14/2011	Clearwater Office

		To: Ross Gould		
Letter re: Freedom of Information Law Request dated July 19, 2010	Letter	From: Joyce R. Cole, Records Access Officer, Westchester County Department of Emergency Services To: Ross Gould	7/27/2010	Clearwater Office
Letter re: FOIL request, Putman County Jail	Letter	From: Ross Gould To: Dennis J. Sant, Putnam County Clerk	8/17/2010	Clearwater Office
Letter re: FOIL request, Orange County Jail	Letter	From: Ross Gould To: Local Emergency Planning Committee of Orange County	8/17/2010	Clearwater Office

In addition, Clearwater may rely upon documents identified by other parties to this proceeding. Clearwater may also rely upon all documents cited or referred to in all documents it has previously filed in this proceeding. As disclosure is continuing Clearwater reserves the right to supplement or amend this response.

Respectfully submitted,



Manna Jo Greene
Environmental Director
Hudson River Sloop Clearwater, Inc.
724 Wolcott Ave.
Beacon, NY 12508
Email: mannajo@clearwater.org

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.	50-247-LR
)		and
ENTERGY NUCLEAR OPERATIONS, INC.)		50-286-LR
)		
(Indian Point Nuclear Generating Units 2 and 3))		
		May 20, 2011	

CERTIFICATE OF SERVICE

Petitioner certifies that on May 20, 2011 copies of the enclosed "HUDSON RIVER SLOOP CLEARWATER, INC.'S MANDATORY DISCLOSURE UPDATE PURSUANT TO C.F.R. § 2.336" were served on the following list by first-class mail and e-mail.

Lawrence G. McDade, Chair Atomic Safety and Licensing Board Panel Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 E-mail: Lawrence.McDade@nrc.gov	Judge Kaye D. Lathrop 190 Cedar Lane East Ridgeway, CO 81432 E-mail: Kaye.Lathrop@nrc.gov
Richard E. Wardwell Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 E-mail: Richard.Wardwell@nrc.gov	Michael J. Delaney Department of Environmental Protection 59-17 Junction Boulevard Flushing NY 11373 E-mail: mdelaney@dep.nyc.gov (718) 595-3982
John J. Sipos, Esq. Assistant Attorney General Office of the New York Attorney General for the State of New York The Capitol Albany, NY 12224 E-mail: John.Sipos@oag.state.ny.us	Kathryn M. Sutton, Esq. Paul M. Bessette, Esq. Jonathan M. Rund, Esq. Morgan, Lewis & Bockius, LLP 1111 Pennsylvania Ave. N.W. Washington, D.C. 20004 E-mail: pbessette@morganlewis.com ksutton@morganlewis.com jrund@morganlewis.com

<p>Josh Kirstein, Law Clerk Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555 E-mail: Josh.Kirstein@nrc.gov</p>	<p>Martin J. O'Neill, Esq. Morgan, Lewis & Bockius, LLP 1000 Louisiana Street, Suite 4000 Houston, TX 77002 E-mail: martin.oneill@morganlewis.com</p>
<p>Janice A. Dean, Esq. Assistant Attorney General Office of the Attorney General 120 Broadway, 26th Floor New York, NY 10271 E-mail: Janice.dean@oag.state.ny.us</p>	<p>Office of Commission Appellate Adjudication U.S. Nuclear Regulatory Commission Washington, D.C. 20555 E-mail: OCAAMAIL@nrc.gov</p>
<p>Office of the Secretary Rulemakings and Adjudications Staff U.S. Nuclear Regulatory Commission Washington, D.C. 20555 E-mail: HEARINGDOCKET@nrc.gov</p>	<p>William C. Dennis, Esq. Entergy Nuclear Operations, Inc. 440 Hamilton Avenue White Plains, NY 10601 E-mail: wdennis@entergy.com</p>
<p>Stephen C. Filler, Board Member Hudson River Sloop Clearwater, Inc. 724 Wolcott Ave Beacon, New York 12508 E-mail: sfiller@nylawline.com</p>	<p>Phillip Musegaas, Esq. Deborah Brancato, Esq. Riverkeeper, Inc. 20 Secor Road Ossining, NY 10562 Emails: phillip@riverkeeper.org dbrancato@riverkeeper.org</p>
<p>Melissa-Jean Rotini, of counsel Assistant County Attorney Office of Robert F. Meehan, Westchester County Attorney 148 Martine Avenue, 6th Floor White Plains, NY 10601 E-mail: MJR1@westchestergov.com</p>	<p>Joan Leary Matthews, Esq. Senior Attorney for Special Projects New York State Department of Environmental Conservation 625 Broadway, 14th floor Albany, New York 12233-5500 E-mail: jlmatthe@gw.dec.state.ny.us</p>
<p>Ross H. Gould, Esq. 270 Route 308 Rhinebeck, NY 12572 E-mail: rgouldesq@gmail.com</p>	<p>Thomas F. Wood, Esq. Daniel Riesel, Esq. Jessica Steinberg, Esq. Sive, Paget and Riesel, P.C. 460 Park Avenue New York, NY 10022 E-mail: driesel@sprlaw.com jsteinberg@sprlaw.com</p>

<p>Robert D. Snook, Esq. Assistant Attorney General 55 Elm Street, P.O. Box 120 Hartford, CT 06141-0120 E-mail: Robert.Snook@po.state.ct.us</p>	<p>John L. Parker, Esq. Regional Attorney, Region 3 New York State Department of Environmental Conservation 21 South Putt Corners New Paltz, NY 12561 E-mail: jlparker@gw.dec.state.ny.us</p>
<p>Elise N. Zoli, Esq. Goodwin Procter, LLP 53 State Street Boston, MA 02109 E-mail: ezoli@goodwinprocter.com</p>	<p>Mylan L. Denerstein, Esq. Executive Deputy Attorney General 120 Broadway, 25th Floor New York, NY 10271 E-mail: mylan.denerstein@oag.state.ny.us</p>
<p>Sherwin E. Turk Beth N. Mizuno Brian G. Harris David E. Roth Andrea Z. Jones Office of General Counsel Mail Stop: 0-15D21 U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001 E-mail: Sherwin.Turk@nrc.gov; Beth.Mizuno@nrc.gov; brian.harris@nrc.gov; David.Roth@nrc.gov; andrea.jones@nrc.gov;</p>	<p>Sean Murray, Mayor Village of Buchanan Municipal Building 236 Tate Avenue Buchanan, NY 10511-1298 E-mail: vob@bestweb.net, SMurray@villageofbuchanan.com, Administrator@villageofbuchanan.com</p>

Manna Jo Greene

Manna Jo Greene, Environmental Director
Hudson River Sloop Clearwater, Inc.
724 Wolcott Avenue
Beacon, New York 12508
E-mail: Mannajo@clearwater.org

May 20, 2011