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C O U N S E L O R S A T L A W

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June 1, 2011

Robert V. Eye, Esq.
Kauffman & Eye
112 SW 6th Ave., Suite 202
Topeka, KS 66603

Michael Spencer, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Twentieth Update to Disclosures Pursuant to 10 C.F.R. § 2.336; *Nuclear Innovation North America LLC* (South Texas Project Units 3 and 4), Docket Nos. 52-012 and 52-013

Pursuant to 10 C.F.R. § 2.336, the agreement among the parties dated September 10, 2009, and the Initial Scheduling Order dated October 20, 2009, Nuclear Innovation North America LLC (NINA) is providing the twentieth update to its disclosures with respect to Intervenor's Contention CL-2, as restated and admitted by the Atomic Safety and Licensing Board (Board) on July 2, 2010 (LBP-10-14), and Contention DEIS-1-G, as admitted by the Board on February 28, 2011 (LBP-11-07).

NINA's disclosures consist of the following:

- Enclosure 1 provides the names, addresses, and telephone numbers of the persons upon whose opinion NINA will base its positions on the contentions and upon whom NINA may rely as a witness, and a copy of the analyses and authorities upon which they base their opinions.
- Enclosure 2 provides a description, by category and location, of all relevant non-privileged documents, data compilations, and tangible things in the possession, custody, or control of NINA that are relevant to the admitted contentions in this proceeding. If you determine that you would like a copy of any of these documents, please inform me of which documents you would like and I will provide a copy to you.

Mr. Robert V. Eye, et al.

June 1, 2011

Page 2

- Enclosure 3 provides an index of any documents, data compilations, or tangible things in the possession, custody, or control of NINA that may be relevant to the contentions but contain proprietary-related or otherwise protected information. Upon request by the NRC Staff, NINA will provide a copy using the procedure in 10 C.F.R. § 2.390. If the Intervenor desire a copy, NINA will work with the Intervenor to develop a mutually acceptable proposed amendment to the Protective Order for issuance by the Board. NINA will provide any requested proprietary documents to the Intervenor after the Board has entered an amended Protective Order.
- Enclosure 4 provides an index of relevant documents that are otherwise publicly available.

In order to compile Enclosures 2, 3, and 4, NINA made a reasonable good faith search of its records since the previous disclosures filed on May 2, 2011. The attached affidavit attests that all relevant materials identified by this search have been disclosed, and that the disclosures are accurate and complete as of May 15, 2011. Additions to the logs since the last disclosures are highlighted.

In the event that NINA identifies additional relevant documents or the witnesses for any hearing on the contentions, NINA will update these disclosures on the 1st day of each month (subject to 10 C.F.R. § 2.306(a)), as required by 10 C.F.R. § 2.336(d), the agreement among the parties dated September 10, 2009, and the Initial Scheduling Order dated October 20, 2009.

NINA has been conservative in identifying documents for inclusion in Enclosures 2, 3, and 4. By identifying documents on those Enclosures, NINA does not necessarily concede that the documents are in fact relevant or material to the admitted contention.

Sincerely,

Signed (electronically) by Stephen J. Burdick

Stephen J. Burdick

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Counsel for Nuclear Innovation North America LLC

Enclosures

cc: Service List

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

June 1, 2011

1. My name is Scott Head. My title is Manager, Regulatory Affairs for South Texas Project, Units 3 & 4. Working with the attorneys for Nuclear Innovation North America LLC (NINA), I have been responsible for managing the searches, collection, and compilation of documents, data compilations, and tangible things to comply with the mandatory disclosure requirements in 10 C.F.R. § 2.336.
2. This Affidavit relates to the disclosures that NINA is providing on June 1, 2011 in the above-captioned proceeding pursuant to 10 C.F.R. § 2.336, the parties' joint agreement on mandatory disclosures, dated September 10, 2009, and the Initial Scheduling Order, dated October 20, 2009.
3. A reasonable good faith search was conducted of documents, data compilations, and tangible things in the possession, custody, or control of NINA for the types of information specified in 10 C.F.R. § 2.336(a). As provided in 10 C.F.R. § 2.336(c), this search was conducted based on information and documents reasonably available to NINA:
 - a. The searches encompassed both electronic and paper documents.

- b. The searches encompassed both South Texas Project (STP) Units 3 and 4 project-related files and documents in the possession and control of employees who have worked on the STP Units 3 and 4 project.
 - c. The searches also encompassed documents, data compilations, and tangible things in the possession and control of the vendors and contractors who have supported the NINA combined license application to the extent that NINA has rights to these documents, data compilations, and tangible things.
 - d. Searches did not encompass documents in the possession of individuals who did not work on the STP Units 3 and 4 project or files unrelated to the STP Units 3 and 4 project.
- 4. Enclosure 2 provides the index of relevant non-privileged, non-protected documents, data compilations, and tangible things that were located as a result of this search.
 - 5. Enclosure 3 provides the index of relevant documents, data compilations, and tangible things containing proprietary-related or otherwise protected information.
 - 6. Enclosure 4 provides the index of relevant documents, data compilations, and tangible things that are publicly available.
 - 7. NINA has been conservative in identifying documents for inclusion in Enclosures 2, 3, and 4. By identifying documents on those Enclosures, I do not necessarily concede that the documents are in fact relevant or material to the admitted contention.
 - 8. These disclosures are accurate and complete as of May 15, 2011.

The statements made above are true to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Accord with 10 C.F.R. § 2.304(d)

Scott M. Head

Manager, Regulatory Affairs

South Texas Project, Units 3 & 4

4000 Avenue F – Suite A

Bay City, TX 77414

Phone: 361-972-7136

Fax: 361-972-8298

E-mail: smhead@stpegs.com

Executed this 1st day of June 2011

ENCLOSURE 1

NINA WITNESSES

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:

Response: Contention CL-2

Jeffrey L. Zimmerly
Tetra Tech NUS, Inc.
Aiken Office
900 Trail Ridge Rd.
Aiken, SC 29803
Phone: 803-641-4938

Adrian Pieniazek
NRG Energy, Inc.
1005 Congress Ave., Suite 1000
Austin, TX 78701
Phone: 512-473-8895

Response: Contention DEIS-1-G

Adrian Pieniazek
NRG Energy, Inc.
1005 Congress Ave., Suite 1000
Austin, TX 78701
Phone: 512-473-8895

A copy of the analysis or other authority upon which that person bases his or her opinion:

Response: Contention CL-2

The witnesses will rely upon the May 9, 2011 “Direct Testimony of Applicant Witnesses Jeffrey L. Zimmerly and Adrian Pieniazek Regarding Contention CL-2” and the May 31, 2011 “Rebuttal Testimony of Applicant Witnesses Jeffrey L. Zimmerly and Adrian Pieniazek Regarding Contention CL-2.”

Response: Contention DEIS-1-G

The witness will rely upon the May 9, 2011 “Direct Testimony of Applicant Witness Adrian Pieniazek Regarding Contention DEIS-1-G,” and the May 31, 2011 “Rebuttal Testimony of Applicant Witness Adrian Pieniazek Regarding Contention DEIS-1-G.”

ENCLOSURE 2

Mandatory Disclosure Log

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/DESCRIPTION | CONTENTION |
|-----------|---|-------------------------|--|-----|---|------------|
| 1 - 14 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | |
| 15 | MOVED TO ENCLOSURE 4 | | | | | |
| 16 - 145 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | |
| 146 | 10/19/2009 | Morgan, Lewis & Bockius | Tetra Tech | N/A | Calculation of Impacts at Collocated Units from an Initiating Accident at a Site Unit | CL-2 |
| 147 - 172 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | |
| 173 | 09/14/2010 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Unit Dispatch – Removing All STP Units | CL-2 |
| 174 | 09/14/2010 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Calculations to Support Joint Affidavit | CL-2 |
| 175 | 09/14/2010 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Unit Dispatch Base Case | CL-2 |
| 176 | 01/08/2009 | Morgan, Lewis & Bockius | City Public Service Board (CPS Energy) | N/A | CPS Energy – Strategic Energy Plan Update | DEIS-1-G |
| 177 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (Austin Energy Load Zone) | CL-2 |
| 178 | 04/27/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | December 2010 – Average All Load Zone Prices | CL-2 |
| 179 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (CPS Load Zone) | CL-2 |
| 180 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (Houston Load Zone) | CL-2 |
| 181 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (Lower Colorado River Authority Load Zone) | CL-2 |
| 182 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (North Load Zone) | CL-2 |
| 183 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (Rayburn Load Zone) | CL-2 |
| 184 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (South Load Zone) | CL-2 |
| 185 | 05/20/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Real-Time Market Settlement Point Prices (West Load Zone) | CL-2 |
| 186 | 05/06/2011 | Morgan, Lewis & Bockius | J. Zimmerly | N/A | SAMDA Monetized Benefits Calculations | CL-2 |
| 187 | 05/06/2011 | Morgan, Lewis & Bockius | A. Pieniazek J. Zimmerly | N/A | SAMDA Calculations in Support of Direct Testimony | CL-2 |
| 188 | 05/06/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Unit Dispatch Calculations-STP Units and Wind Generation Removed | CL-2 |
| 189 | 05/06/2011 | Morgan, Lewis & Bockius | A. Pieniazek | N/A | Unit Dispatch Calculations-Wind Generation Removed | CL-2 |

*Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

ENCLOSURE 3

Proprietary Log

| DOC # | DATE | LOCATION* | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION | BASIS FOR PROPRIETARY STATUS |
|--------|---|-----------|---------------------|----|----------------------|------------|------------------------------|
| 1 - 30 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | | |

*Morgan Lewis is located at 1111 Pennsylvania Avenue, NW, Washington, DC 20004.

ENCLOSURE 4

Publicly Available Log

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|---------|---|---|--------------------------|-----|---|------------|
| 1 - 27 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | |
| 28 | January 1997 | Available at http://www.osti.gov/energycitations/servlets/purl/446391-rCqSr4/webviewable/446391.pdf | NRC | N/A | NUREG/BR-0184, Regulatory Analysis Technical Evaluation Handbook | CL-2 |
| 29 - 32 | DELETED PER LBP-10-14 (DISMISSING CONTENTIONS 8, 9, 14, 16, AND 21) | | | | | |
| 33 | August 2009 | Available at http://www.puc.state.tx.us/wmo/documents/annual_reports/2008annual_report.pdf | Potomac Economics, Ltd. | N/A | 2008 State of the Market Report for the ERCOT Wholesale Electricity Markets | CL-2 |
| 34 | 12/21/1994 | Available at ADAMS Accession No. ML100210563 | GE Nuclear | NRC | Technical Support Document for the ABWR, Rev. 1 | CL-2 |
| 35 | November 2005 | Available at ADAMS Accession No. ML060300194 | Nuclear Energy Institute | N/A | Severe Accident Mitigation Alternatives (SAMA) Analysis Guidance Document | CL-2 |
| 36 | July 2010 | Available at http://www.potomaceconomics.com/uploads/ercot_reports/2009_ERCOT_SOM_REPORT_Final.pdf | Potomac Economics, Ltd. | N/A | 2009 State of the Market Report for the ERCOT Wholesale Electricity Markets | CL-2 |
| 37 | May 2010 | Available at http://www.ercot.com/content/news/presentations/2010/2010_Capacity_Demand_and_Reserves.pdf | ERCOT | N/A | Report on the Capacity, Demand, and Reserves in the ERCOT Region | CL-2 |
| 38 | 07/01/2010 | Available at http://www.ercot.com/content/mktrules/guides/operating/2010/07/04/04-070110.doc | ERCOT | N/A | ERCOT Operating Guides, Section 4: Emergency Operation | CL-2 |
| 39 | 2009 | Available at http://www.ercot.com/content/gridinfo/load/load_hist/2009%20ERCOT%20Hourly%20Load%20Data.xls | ERCOT | N/A | ERCOT Hourly Load Data | CL-2 |
| 40 | 08/01/2010 | Available at http://www.ercot.com/mktrules/protocols/library/index | ERCOT | N/A | ERCOT Protocols Section 6: Ancillary Services | CL-2 |

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|---------------|--|--|------|---|------------|
| 41 | October 2008 | Available at http://aceee.org/research-report/e086 | American Council for an Energy Efficient Economy | N/A | State Energy Efficiency Scorecard | DEIS-1-G |
| 42 | January 2009 | Available at http://my.epri.com/portal/server.pt (enter subject/description into search) | EPRI | N/A | Assessment of Achievable Potential from Energy Efficiency and Demand Response Programs in the U.S. (2010–2030) | DEIS-1-G |
| 43 | 12/10/2008 | Available at http://www.puc.state.tx.us/electric/reports/misc/Electricity_Saving_2009-2018_122308.pdf | Itron | PUCT | Assessment of the Feasible and Achievable Levels of Electricity Savings from Investor Owned Utilities in Texas: 2009–2018 | DEIS-1-G |
| 44 | 01/24/2007 | Available at http://www.ercot.com/content/meetings/other/keydocs/2007/0124-LoadForecast/KDonoho_ERCOTLongTermDemandEnergyForecastingPlanning01242007.ppt | ERCOT | N/A | Long Term Demand and Energy Forecasting | DEIS-1-G |
| 45 | 05/10/2005 | Available at http://www.ercot.com/meetings/board/keydocs/2005/0517/Item_11b_-_Reserve_Margin_Calculation.pdf | ERCOT | N/A | Methodology for Reserve Margin Calculation | DEIS-1-G |
| 46 | 01/12/2007 | Available at http://www.ercot.com/content/meetings/gatf/keydocs/2009/1013/GATF_LOLP_Presentation_1_12_07_as_presented.ppt | ERCOT | N/A | Analysis of Target Reserve Margin | DEIS-1-G |
| 47 | 12/12/2006 | Available at http://www.ercot.com/news/presentations/2006/Attch_A_-_Long_Term_System_Assessment_ERCOT_Region_December_.pdf | ERCOT | N/A | Long Term System Assessment for the ERCOT Region | DEIS-1-G |
| 48 | May 2007 | Available at http://www.ercot.com/news/presentations/2007/07CDR05172007-final.xls | ERCOT | N/A | Report on the Capacity Demand and Reserves in the ERCOT Region | DEIS-1-G |
| 49 | December 2010 | Available at http://www.ercot.com/content/news/presentations/2011/ERCOT%202010%20Capacity,%20Demand%20and%20Reserves%20Report%20-%20Winter%20Upd.pdf | ERCOT | N/A | Report on the Capacity Demand and Reserves in the ERCOT Region | DEIS-1-G |
| 50 | 09/15/2006 | Available at http://www.ercot.com/services/programs/load/DSWG_Presentation_to_PUCT_Workshop_9 | ERCOT | PUCT | Demand Side Working Group | DEIS-1-G |

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|----------------|---|--|-----|--|------------|
| | | 15_06.ppt | | | | |
| 51 | 12/10/2010 | Available at ADAMS Accession No. ML103500553 | NRC | N/A | Summary of Teleconference with ERCOT | DEIS-1-G |
| 52 | March 2007 | Available at http://www.aceee.org/research-report/e073 | American Council for an Energy Efficient Economy | N/A | Potential for Energy Efficiency, Demand Response, and Onsite Renewable Energy to Meet Texas's Growing Electricity Needs | DEIS-1-G |
| 53 | 06/25/2010 | Available at http://www.ercot.com/content/news/presentations/2011/2010%20Long-Term%20Hourly%20Peak%20Demand%20and%20Energy%20Forecast.pdf | ERCOT | N/A | Long Term Peak Demand and Energy Forecast | DEIS-1-G |
| 54 | 05/08/2007 | Available at http://www.ercot.com/news/presentations/2007/2007_ERCOT_Planning_Long_Term_Hourly_Demand_Energy_Forecast.pdf | ERCOT | N/A | Long Term Peak Demand and Energy Forecast | DEIS-1-G |
| 55 | December 2006 | Available at http://www.ercot.org/content/news/presentations/2006/2006_ERCOT_Reports_Transmission_Constraints_and_Needs.pdf | ERCOT | N/A | Report on Existing and Potential Electric System Constraints and Needs | DEIS-1-G |
| 56 | November 2007 | Available at http://www.bea.gov/scb/pdf/2007/11%20November/1107_cpipce.pdf | Clinton P. McCully, Brian C. Moyer, and Kenneth J. Stewart | N/A | Comparing the Consumer Price Index and the Personal Consumption Expenditures Price Index | CL-2 |
| 57 | January 2003 | Available at http://www.ppic.org/content/pubs/report/r_103cwr.pdf | Public Policy Institute of California | N/A | The California Electricity Crises: Causes and Policy Options | CL-2 |
| 58 | 06/01/2010 | Available at www.ercot.com/content/mktrules/protocols/current/05-060110.doc | ERCOT | N/A | ERCOT Protocols Section 5: Dispatch | CL-2 |
| 59 | September 2004 | Available at http://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0058/br0058r4.pdf | NRC | N/A | NUREG/BR-0058, Rev. 4, Regulatory Analysis Guidelines of the NRC | CL-2 |

| DOC # | DATE | LOCATION | AUTHOR OR CUSTODIAN | TO | SUBJECT/ DESCRIPTION | CONTENTION |
|-------|--------------|--|--|-----|---|------------|
| 60 | 10/29/1992 | Available at http://www.whitehouse.gov/sites/default/files/omb/assets/a94/a094.pdf | Office of Management and Budget | N/A | Circular A-94 Guidelines and Discount Rates For Benefit-Cost Analysis of Federal Programs | CL-2 |
| 61 | June 2010 | Available at http://esl.tamu.edu/docs/terp/2010/ESL-TR-10-06-01.pdf | ERCOT | N/A | 2010 Texas Jurisdiction Energy Code Adoption Survey | DEIS-1-G |
| 62 | March 2011 | Available at http://www.aceee.org/sites/default/files/publications/researchreports/E112.pdf | American Council for an Energy Efficient Economy | N/A | Energy Efficiency Investments as an Economic Productivity Strategy for Texas | DEIS-1-G |
| 63 | June 2006 | Available at http://www.ercot.com/news/presentations/2006/index | ERCOT | N/A | Report on Capacity, Demand and Reserves in the ERCOT Region | DEIS-1-G |
| 64 | 05/20/2011 | Available at http://data.bls.gov/pdq/SurveyOutputServlet | Bureau of Labor Statistics | N/A | Producer Price Index-Commodities | CL-2 |
| 65 | 05/25/2011 | Available at http://www.eia.gov/oiaf/aeo/tablebrowser/#release=AEO2011&subject=0-AEO2011&table=78-AEO2011&region=0-0&cases=ref2011-d020911a | U.S. Energy Information Administration | N/A | Natural Gas Delivered: Electric Power: West South Central: Reference Case | CL-2 |
| 66 | October 1999 | Available at ADAMS Accession No. ML003701937 | NRC | N/A | NUREG-1555, Standard Review Plans for Environmental Reviews for Nuclear Power Plants | CL-2 |
| 67 | 12/01/2010 | Available at http://www.ercot.com/mktrules/guides/noperating/2010/index | ERCOT | N/A | ERCOT Nodal Operating Guides, Section 4: Emergency Operation | CL-2 |

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|--------------------------------------|---|------------------------|
| In the Matter of |) | |
| |) | Docket Nos. 52-012-COL |
| |) | 52-013-COL |
| NUCLEAR INNOVATION NORTH AMERICA LLC |) | |
| |) | |
| (South Texas Project Units 3 and 4) |) | June 1, 2011 |
| |) | |

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2011 a copy of Nuclear Innovation North America LLC's
"Twentieth Update to Disclosures Pursuant to 10 C.F.R. § 2.336" was served by the Electronic
Information Exchange on the following recipients:

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