UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

In the Matter of South Texas Project Nuclear Operating Co. Application for the South Texas Project Units 3 and 4 Combined Operating License

Docket Nos. 52-012, 52-013 July 1, 2011

INTERVENORS' TWENTY-FIRST UPDATE TO DISCLOSURES

Pursuant to 10 C.F.R. § 2.336 and the Initial Scheduling Order dated October 20, 2009, Intervenors state the following:

- 1. Enclosure 1 provides the names, addresses, and telephone numbers of the persons upon whose opinion Intervenors will base its positions on the contentions and upon whom Intervenors may rely as a witness. Their testimony has previously been filed in the docket.
- 2. All documents in the possession, custody, or control of the Intervenors are contained in the exhibit list, which has previously been filed in the docket.

Respectfully submitted,

/s/ Robert V. Eye Robert V. Eye, Kan. Sup. Ct. No.10689 Kauffman & Eye 123 SE 6th Ave., Suite 200 Topeka, Kansas 66603 785-234-4040 bob@kauffmaneye.com

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2011 a copy of "Intervenors' Twenty-First Update to Disclosures" was served by the Electronic Information Exchange on the following recipients:

Administrative Judge Michael M. Gibson, Chair Atomic Safety and Licensing Board Panel Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail: mmg3@nrc.gov

Administrative Judge Dr. Randall J. Charbeneau Atomic Safety and Licensing Board Panel Mail Stop T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001 E-mail: Randall.Charbeneau@nrc.gov

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Signed (electronically) by Robert V. Eye

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Enclosure 1 INTERVENOR 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:

Clarence Thomas 3707 Robinson Ave. Austin, Texas 78722 Phone: 512-481-1311

Philip Mosenthal Optimal Energy 14 School Street Bristol, VT 05443 Phone: 802-453-5100