

# BLACKBURN CARTER

A Professional Corporation - Lawyers

4709 Austin Street, Houston, Texas 77004  
Telephone (713) 524-1012 ♦ Telefax (713) 524-5165

www.blackburncarter.com

JAMES B. BLACKBURN, JR.

MARY W. CARTER

CHARLES W. IRVINE

ADAM M. FRIEDMAN

MARY B. CONNER

KRISTI J. DENNEY

JAMES B. BLACKBURN, JR.  
Sender's E-Mail: jbb@blackburncarter.com

April 16, 2012

*Via NRC's Electronic Information Exchange and U.S. Certified Mail/RRR*

Sarah W. Price, Esq.  
Laura Goldin, Esq.  
Kevin C. Roach, Esq.  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop O-15-D21  
Washington, DC 20555-0001

Steven P. Frantz  
Stephen J. Burdick  
Jonathan M. Rund  
Mary Freeze  
Joseph B. Fray  
Lance A. Escher  
Morgan Lewis & Bockius, LLP  
1111 Pennsylvania Ave., NW  
Washington, DC 20004

RE: Docket No. 52-042; NRC-2010-0165; *Exelon Nuclear Texas Holdings, LLC,  
Early Site Permit Application for the Victoria County Station Site*

Dear Counsel:

Pursuant to 10 C.F.R. § 2.336, attached is Texans for a Sound Energy Policy's (TSEP) Supplemental Disclosures. The responsive documents are contained on a CD being produced to the parties concurrently with this filing.

Any questions regarding this submission may also be directed to Charles W. Irvine, Blackburn Carter, P.C., 4709 Austin, St., Houston, Texas 77004, (713) 524-1012.

Sincerely,

BLACKBURN CARTER, P.C.

by s/James B. Blackburn, Jr.  
James B. Blackburn, Jr.

Attachments:

1. TSEP'S SUPPLEMENTAL DISCLOSURES
2. AFFIDAVIT OF CHARLES W. IRVINE

c: Per Certificate of Service attached to filing.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

ASLBP No. 11-908-01-ESP-BD01

<hr/>	§	
In the Matter of	§	
	§	
EXELON NUCLEAR TEXAS	§	
HOLDINGS, LLC	§	Docket No. 52-042
	§	
EARLY SITE PERMIT FOR	§	
VICTORIA COUNTY STATION	§	
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**TEXANS FOR A SOUND ENERGY POLICY’S SUPPLEMENTAL DISCLOSURES**

Pursuant to 10 C.F.R. § 2.336, *et seq.*, Texans for a Sound Energy Policy (“TSEP”) hereby submits the following disclosures:

(1) 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, and a copy of the analysis or other authority upon which the person bases his or her opinion.

**RESPONSE:**

Pursuant to the Parties’ Agreement dated July 6, 2011 and the subsequent Initial Scheduling Order issued on August 10, 2011, TSEP will identify any person on which it may rely upon as a witness as soon as the identity of that person becomes known. As of the date of these Disclosures, TSEP has not identified a person on which it may rely upon as a witness.

(2)(i) A copy, or a description by category and location, of all documents and data compilations in the possession, custody, or control of the party that are relevant to the contentions, provided that if only a description is provided of a document or data compilation, a party shall have the right to request copies of that document and/or data compilation, and

(2)(ii) A copy (for which there is no claim of privilege or protected status), or a description by category and location, of all tangible things (e.g., books, publications and treatises) in the possession, custody or control of the party that are relevant to the contention.

(2)(iii) When any document, data compilation, or other tangible thing that must be disclosed is publicly available from another source, such as at the NRC Web site, <http://www.nrc.gov>, and/or the NRC Public Document Room, a sufficient disclosure would be the location, the title and a page reference to the relevant document, data compilation, or tangible thing.

RESPONSE:

TSEP will produce all documents in its possession, custody or control that are relevant to the contentions currently before the NRC.

(3) A list of documents otherwise required to be disclosed for which a claim or privilege or protected status is being made, together with sufficient information for assessing the claim of privilege or protected status of the documents.

RESPONSE:

Pursuant to the scheduling order all discoverable documents have been produced.

Dated: April 16, 2012.

Respectfully submitted,

BLACKBURN CARTER, P.C.

by:           s/ James B. Blackburn, Jr.

JAMES B. BLACKBURN, JR.

Attorney in charge

TBN 02388500

CHARLES IRVINE

TBN 24055716

MARY B. CONNER

TBN 24050440

4709 Austin Street

Houston, Texas 77004

713/524-1012

713/524-5165 (fax)

*Counsel for Texans for a Sound Energy Policy*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of April, 2012, copies of the foregoing TEXANS FOR A SOUND ENERGY POLICY'S SUPPLEMENTAL DISCLOSURES has been served upon the following persons by Electronic Information Exchange.

*s/ James B. Blackburn, Jr.*

James B. Blackburn, Jr.

U.S. Nuclear Regulatory Commission  
Office of the Secretary of the Commission  
Mail Stop O-16C1  
Washington, DC 20555-0001  
Hearing Docket  
Email: hearingdocket@nrc.gov

U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop O-15-D21  
Washington, DC 20555-0001  
Sarah W. Price, Esq.  
Laura Goldin, Esq.  
Kevin C. Roach, Esq.  
Joseph Gilman, Paralegal  
Emails: sarah.price@nrc.gov  
laura.goldin@nrc.gov  
kevin.roach@nrc.gov  
jsg1@nrc.gov  
OGC Mail Center:  
OGCMailCenter@nrc.gov

Steven P. Frantz  
Stephen J. Burdick  
Jonathan M. Rund  
Mary Freeze  
Joseph B. Fray  
Lance A. Escher  
Morgan Lewis & Bockius, LLP  
1111 Pennsylvania Ave., NW  
Washington, DC 20004  
Emails: sfrantz@morganlewis.com  
sburdick@morganlewis.com  
jrund@morganlewis.com  
mfreeze@morganlewis.com  
jfray@morganlewis.com

J. Bradley Fewell  
Exelon Generation Co., LLC  
4300 Winfield Road  
Warren, IL 60555  
Email: bradley.fewell@exeloncorp.com

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
ASLBP No. 11-908-01-ESP-BD01

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VICTORIA COUNTY STATION	§	
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**AFFIDAVIT OF CHARLES W. IRVINE**

I Charles Irvine, do hereby state as follows:

1. I am one of the attorneys of record in the above proceeding. I represent Texans For a Sound Energy Policy. I am personally familiar with and have personal knowledge of the facts contained herein.

2. This affidavit is submitted in support of TEXANS FOR A SOUND ENERGY POLICY'S SUPPLEMENTAL DISCLOSURES. I hereby certify that all relevant materials required by 10 CFR § 2.336 have been disclosed, and that the disclosures are accurate and complete as of the date of this certification.

3. I hereby certify under penalty of perjury that the foregoing is true and complete to the best of my knowledge, information, and belief.

**Executed in Accord with 10 CFR § 2.304(d)**

Charles W. Irvine  
TBN 24055716  
Blackburn Carter, P. C.  
4709 Austin Street  
Houston, Texas 77004  
(713) 524-1012  
Charles@blackburncarter.com

Executed in Houston, Texas  
this 16<sup>th</sup> day of April, 2012