

June 1, 2012

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
CALVERT CLIFFS 3 NUCLEAR)
PROJECT, LLC AND UNISTAR)
NUCLEAR OPERATING SERVICES,)
LLC)
(Calvert Cliffs Nuclear Power Plant, Unit 3))

Docket No. 52-016-COL

APPLICANTS’ SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1

In accordance with 10 C.F.R. § 2.336, the Discovery Disclosure Agreement among the parties dated April 7, 2009, and the Licensing Board’s Order, dated April 22, 2009, Calvert Cliffs 3 Nuclear Project, LLC, and UniStar Nuclear Operating Services, LLC (“UniStar” or “Applicants”) hereby supplement their disclosures with respect to Contention 1.

1. Testifying Witnesses

UniStar has not yet identified the persons upon whom it will rely as witnesses with respect to Contention 1. In accordance with 10 C.F.R. § 2.336(d), UniStar will supplement this disclosure after testifying witnesses are identified.

2. Documents and Data Collections

A description by category of all new, relevant, non-privileged documents and data compilations in the possession, custody, or control of UniStar that are relevant to Contention 1 and subject to disclosure under the parties’ disclosure agreement is attached as Attachment A. A copy of any document is available on request. A list of all new protected documents is provided in Attachment B.

Respectfully submitted,

/s/ signed electronically by

David A. Repka
Tyson R. Smith
Winston & Strawn LLP
1700 K Street, NW
Washington, DC 20006

Carey W. Fleming
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 200C
Baltimore, MD 21202

COUNSEL FOR CALVERT CLIFFS 3
NUCLEAR PROJECT, LLC AND
UNISTAR NUCLEAR OPERATING
SERVICES, LLC

Dated at Washington, District of Columbia
This 1st day of June 2012

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
CALVERT CLIFFS 3 NUCLEAR)
PROJECT, LLC AND UNISTAR)
NUCLEAR OPERATING SERVICES,) Docket No. 52-016
LLC)
)
(Calvert Cliffs Nuclear Power Plant, Unit 3))

CERTIFICATE OF SERVICE

I hereby certify that copies of “APPLICANTS’ SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1” and “CERTIFICATION OF SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1” have been served upon the following persons via the Electronic Information Exchange (“EIE”) this 1st day of June 2012.

U.S. Nuclear Regulatory Commission
Office of Commission Appellate Adjudication
Mail Stop O-16C1
Washington, DC 20555-0001
E-mail: ocaamail@nrc.gov

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

Atomic Safety and Licensing Board Panel
Mail Stop – T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Ronald M. Spritzer, Chair
Administrative Judge
E-mail: rms4@nrc.gov

Gary S. Arnold - Administrative Judge
E-mail: gxa1@nrc.gov

William W. Sager - Administrative Judge
E-mail: wws1@nrc.gov

Megan Wright - Law Clerk
E-mail: mxw6@nrc.gov

U.S. Nuclear Regulatory Commission
Office of the General Counsel
Mail Stop – O-15 D21
Washington, DC 20555-0001

Marian Zabler, Esq.
Susan Vrahoretis, Esq.
Marcia J. Simon, Esq.
Anthony Wilson, Esq.
Adam Gendelman, Esq.
Joseph Gilman, Paralegal
E-mail: Marian.Zabler@nrc.gov
Susan.Vrahoretis@nrc.gov
Marcia.Simon@nrc.gov
Anthony.Wilson@nrc.gov
Adam.Gendelman@nrc.gov
Joseph.Gilman@nrc.gov

OGC Mail Center: ogcmailcenter@nrc.gov

Michael Mariotte, Executive Director
Diane D'Arrigo
Nuclear Information Resource Service
6390 Carroll Avenue, #340
Takoma Park, MD 20912
Michael Mariotte, Executive Director
Diane D'Arrigo
E-mail: nirsnet@nirs.org
dianed@nirs.org

Beyond Nuclear
6930 Carroll Avenue, Suite 400
Takoma Park, MD 20912
Paul Gunter, Director
E-mail: paul@beyondnuclear.org

Southern MD CARES
P.O. Box 354
Solomons, MD 20688
June Sevilla, Spokesperson
E-mail: qmakeda@chesapeake.net

State of Maryland
Office of the Attorney General
Maryland Energy Administration and
Power Plant Research Program of the
Department of Natural Resources
1623 Forest Drive, Suite 300
Annapolis, Maryland 21403
Bret A. Bolea, Assistant Attorney General
M. Brent Hare, Assistant Attorney General
E-mail: BBolea@energy.state.md.us
bhare@energy.state.md.us

Harmon, Curran, Spielberg, & Eisenberg
1726 M Street N.W., Suite 600
Washington, D.C. 20036
Diane Curran
Mathew D. Fraser
E-mail: dcurran@harmoncurran.com
mfraser@harmoncurran.com

Public Citizen
215 Pennsylvania Avenue, SE
Washington, DC 20003
Allison Fisher, Organizer – Energy Program
E-mail: afisher@citizen.org

William Johnston
3458 Holland Cliffs Road
Huntingtown, MD 20639
E-mail: wj3@comcast.net

Cathy Garger
10602 Ashford Way
Woodstock, MD 21163
E-mail: savorsuccesslady3@yahoo.com

/s/ signed electronically by

David A. Repka
Tyson R. Smith
Rachel Miras-Wilson
Winston & Strawn LLP
1700 K Street, NW
Washington, DC 20006

Carey W. Fleming
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 200C
Baltimore, MD 21202

COUNSEL FOR CALVERT CLIFFS 3
NUCLEAR PROJECT, LLC AND
UNISTAR NUCLEAR OPERATING
SERVICES, LLC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)
)
CALVERT CLIFFS 3 NUCLEAR)
PROJECT, LLC AND UNISTAR)
NUCLEAR OPERATING SERVICES,)
LLC)
(Calvert Cliffs Nuclear Power Plant, Unit 3))

Docket No. 52-016-COL

CERTIFICATION OF SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1

I, Carey W. Fleming, do hereby state as follows:

1. I am employed as the Senior Counsel for Constellation Energy Nuclear Group, LLC. Working with attorneys for the Applicants on behalf of UniStar Nuclear Energy, 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. A search was conducted of documents, data compilations, and tangible things under the custody and control of the Applicants for the types of information specified in 10 C.F.R. § 2.336(a). The search was based on information and documents reasonably available to the Applicants. The searches encompassed both electronic and paper documents.
3. I hereby certify that to the best of my knowledge, information, and belief all relevant materials required to be disclosed pursuant to 10 C.F.R. § 2.336(a) in the captioned proceeding have been disclosed, and that the disclosures are accurate and complete as of April 30, 2012.
4. 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 C.F.R. § 2.304(d),

/s/ Carey W. Fleming

Carey W. Fleming
Constellation Energy Nuclear Group, LLC
100 Constellation Way, Suite 200C
Baltimore, MD 21202

Dated at Baltimore, Maryland
this 1st day of June 2012

UniStar Calvert Cliffs Unit 3
 Contention 1 - FOCI
 (Non-Proprietary)
 Disclosures, dated June 1, 2012

Doc No.	Document ID	Author	To	Other Recipients	Date	Subject	Attachments
140	0011713	Eifler, Laura R	Gibson, Gregory T		6-Apr-2012	RE: Info	

UniStar Calvert Cliffs Unit 3
 Contention 1 - FOCI (Proprietary)
 Disclosures, dated June 1, 2012

Doc No.	Document ID	Author	To	Other Recipients	Date	Subject	Attachments	Attorney-Client	Attorney Work Product
227	0011485				9-May-2012	Status of U.S. Partner		Yes	Yes