

Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: 202.739.3000
Fax: 202.739.3001
www.morganlewis.com

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

Alex S. Polonsky
Partner
202.739.5830
apolonsky@morganlewis.com

August 1, 2012

VIA ELECTRONIC INFORMATION EXCHANGE

Anthony Z. Roisman, Esq.
National Legal Scholars Law Firm, P.C.
241 Poverty Lane, Unit 1
Lebanon, NH 03766

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

Re: First Supplemental Disclosures Pursuant to 10 C.F.R. § 2.336; Exelon Generation Company, LLC, License Renewal for Limerick Generating Station, Units 1 and 2, Docket Nos. 50-352-LR and 50-353-LR

Dear Counsel:

Pursuant to 10 C.F.R. § 2.336 and the Board's Scheduling Order dated May 7, 2012, Exelon Generation Company, LLC (Exelon) is providing the enclosed supplemental disclosures with respect to Natural Resource Defense Council (NRDC) Contention 1 as restated and admitted by the Board in LBP-12-08 on April 4, 2012.

Exelon's disclosures consist of the following

- Enclosure 1 is reserved for the names, addresses, and telephone numbers of the persons upon whose opinion Exelon will base its positions on the contention and upon whom Exelon may rely as witnesses, and a copy of the analyses and authorities upon which they base their opinions. Exelon has not yet identified witnesses for any hearing on the contention, and will update Enclosure 1 when it has identified its witnesses.
- Enclosure 2 provides a description, by category and location, of the documents, data compilations, and tangible things in the possession, custody, or control of Exelon that

Anthony Z. Roisman, Esq.
Maxwell Smith, Esq.
August 1, 2012
Page 2

may be relevant to the admitted contention, as modified by the Board's May 7, 2012 Scheduling Order.

- Enclosure 3 is reserved for an index of documents, data compilations, or tangible things that may be relevant to the admitted contention but that contain proprietary or Sensitive Unclassified Non-Safeguards Information (SUNSI). There are no such documents in this round of supplemental disclosures.
- Enclosure 4 provides an index of documents, data compilations, or tangible things that may be relevant to the admitted contention but that contain privileged information, as modified by the Board's May 7, 2012 Scheduling Order. Some of the materials identified on Enclosure 4 may also contain proprietary information or SUNSI.

In order to compile Enclosures 2, 3 and 4, a reasonable search was conducted of documents in Exelon's possession, custody, or control, from custodians (and central files) expected to have relevant materials. The attached affidavit attests that all relevant materials identified by this search that are required to be disclosed have been disclosed.

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

All documents are available through Morgan, Lewis & Bockius, LLP, located at 1111 Pennsylvania Avenue, N.W., Washington, D.C. 20004.

Sincerely,

Signed in Accordance with 10 C.F.R. § 2.304(d)

Alex S. Polonsky

Counsel for Exelon Generation Company, LLC
Enclosures

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
EXELON GENERATION COMPANY, LLC)	Docket Nos. 50-352-LR
(Limerick Generating Station, Units 1 and 2))	50-353-LR
)	August 1, 2012

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, Exelon served a copy of its first Supplemental Disclosures, supporting affidavit, and transmittal letter on the following recipients via the Electronic Information Exchange:

Administrative Judge
William J. Froehlich, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: William.Froehlich@nrc.gov

Office of the Secretary
U.S. Nuclear Regulatory Commission
Rulemakings and Adjudications Staff
Washington, DC 20555-0001
E-mail: HearingDocket@nrc.gov

Administrative Judge
Dr. William E. Kastenberg
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: William.Kastenberg@nrc.gov

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

Administrative Judge
Michael F. Kennedy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: Michael.Kennedy@nrc.gov

Matthew Flyntz
Law Clerk
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: Matthew.Flyntz@nrc.gov

Natural Resources Defense Council (NRDC)
1152 15th St., N.W.
Washington, D.C. 20005
Geoffrey H. Fettus, Senior Project Attorney
E-mail: GFettus@nrdc.org

National Legal Scholars Law Firm, P.C.
241 Poverty Lane, Unit 1
Lebanon, NH 03766
Anthony Z. Roisman, Managing Partner
E-mail: ARoisman@nationallegalscholars.com

Office of the General Counsel
U.S. Nuclear Regulatory Commission
Mail Stop O-15D21
Washington, DC 20555-0001
OGCMailCenter@nrc.gov
Catherine Kanatas
Catherine.Kanatas@nrc.gov
Brian Newell
Brian.Newell@nrc.gov
Maxwell Smith
Maxwell.Smith@nrc.gov
Mary Spencer
Mary.Spencer@nrc.gov
Ed Williamson
Edward.Williamson@nrc.gov

Signed (electronically) by Anna V. Jones

Anna Vinson Jones
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., NW
Washington, DC 20004
Phone: (202) 739-5881
Fax: (202) 739-3001
E-mail: Anna.Jones@morganlewis.com

Counsel for Exelon

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

EXELON GENERATION COMPANY, LLC)

(Limerick Generating Station, Units 1 and 2))
_____)

Docket Nos. 50-352-LR
50-353-LR

AFFIDAVIT OF NANCY L. RANEK

1. My name is Nancy L. Ranek. I am the Environmental Lead, License Renewal, at Exelon Generation Company, LLC ("Exelon"). Working with the attorneys for Exelon, I have been responsible for managing the collection of documents, data compilations, and tangible things to comply with the mandatory disclosure requirements in 10 C.F.R. § 2.336 and the Atomic Safety and Licensing Board's Initial Scheduling Order dated May 7, 2012 ("Scheduling Order") in this proceeding.

2. Exelon conducted a search of documents, data compilations, and tangible things in its possession custody, and control for information relevant to the admitted contention, and in the possession, custody, and control of its relevant contractor organizations, as specified in 10 C.F.R. § 2.336(a). As provided in 10 C.F.R. §2.336(c), this search encompassed information and documents reasonably available to Exelon and its relevant contractor organizations, including:

- a. Both electronic and paper documents;
- b. Corporate records, Limerick license renewal project files, and documents in the possession and control of individuals who have worked on the

Limerick license renewal project or on matters potentially relevant to the admitted contentions; and

- c. Documents, data compilations, and tangible things in the possession and control of ERIN Engineering & Research, Inc. (“ERIN”) and URS Corporation (“URS”), which assisted Exelon in preparing portions of the Limerick Environmental Report.

3. Enclosure 1 is reserved for the names, addresses, and telephone numbers of the persons upon whose opinion Exelon will base its positions on the contention and upon whom Exelon may rely as witnesses, and a copy of the analyses and authorities upon which they base their opinions. Exelon has not yet identified witnesses for any hearing on the contention.

4. Consistent with the Board’s May 7, 2012 Scheduling Order, Enclosure 2 to this Affidavit provides an index of relevant, non-privileged, non-protected documents, data compilations, and tangible things that were located as a result of this search.


5. Consistent with the Board’s May 7, 2012 Scheduling Order, Enclosure 3 to this Affidavit is reserved for an index of relevant documents, data compilations, and tangible things that Exelon believes are proprietary to Exelon or its relevant contractor organizations, or falls within the category of Sensitive Unclassified, Non-Safeguards Information (“SUNSI”). There are no such documents in this round of disclosures.

6. Consistent with the Board’s May 7, 2012 Scheduling Order, Enclosure 4 to this Affidavit provides an index of relevant documents, data compilations, and tangible things that Exelon believes are privileged.

7. Exelon has been conservative in identifying documents for inclusion in the enclosures. Accordingly, Exelon is not suggesting that just because a document is listed on an enclosure that it is indeed relevant to the admitted contention.

8. These disclosures are reasonably accurate and complete as of July 1, 2012.
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.


Nancy L. Ranek
Exelon Generation Company, LLC
License Renewal Environmental Lead
200 Exelon Way, KSA/2-E
Kennett Square, PA 19348
Phone: 610-765-5369
Email: nancy.ranek@exeloncorp.com

Executed this 27 day of July 2012.

DB1/ 70520361.1

DOCUMENT NUMBER	DATE	AUTHOR / CUSTODIAN	DOCUMENT TYPE	TO	FILE NAME / EMAIL SUBJECT LINE
152	4/20/12	Gregory Krueger (Exelon)	Email	Kathleen Turner (BSC)	RE: Limerick: Data Status Update
153	4/30/10	Gregory Krueger (Exelon)	DOC	n/a	Limerick Plant Changes Impacting CDF for LR.doc
154	8/16/89	Steven Varga (NRC)	PDF	G.A. Hunger (PECO)	Lim_SAMDA_Supplement_16aug1989.PDF
155	4/17/89	G.A. Hunger (PECO)	PDF	NRC	10CFR50.63, "Loss of All Alternating Current Powwer"
156	10/31/89	David Helwig (PECO)	PDF	NRC	Response to NRC Generic Letter 88-20, "Individual Plant Response to NRC Generic Letter 88-20, Individual Plant Examination for Severe Accident Vulnerabilities"
157	4/9/90	G.A. Hunger (PECO)	PDF	NRC	10CFR50.63, "Loss of All Alternating Current Powwer" Supplemental Information
158	6/3/91	Richard Clark (NRC)	PDF	George Beck (PECO)	Station Blackout Analysis, Limerick Generating Station, Units 1 and 2 (TAC Nos. 68561 and 68562)
159	9/4/91	George Beck (PECO)	PDF	NRC	10CFR50.63, "Loss of All Alternating Current" Response to NRC Concerns
160	2/4/92	George Beck (PECO)	PDF	NRC	10CFR50.63, "Loss of All Alternating Current" Response to NRC Concerns
161	7/30/92	George Beck (PECO)	PDF	n/a	Response to NRC Generic Letter 88-20, "Individual Plant Response to NRC Generic Letter 88-20, Individual Plant Examination for Severe Accident Vulnerabilities"

DOCUMENT NUMBER	DATE	AUTHOR / CUSTODIAN	DOCUMENT TYPE	TO	SUBJECT	BASIS FOR PRIVILEGE
20	4/17/2012	Gregory Krueger (Exelon)	Email	Nancy Ranek (Exelon)	Discussion of Work Directed by Counsel	Attorney Work Product
21	6/4/2012	Gareth Parry (ERIN)	Email	Gregory Krueger (Exelon)	Discussion of Work Directed by Counsel	Attorney Work Product
22	6/11/2012	Don Vanover (ERIN)	Email	Philip Tarpinian (Exelon)	Discussion of Work Directed by Counsel	Attorney Work Product
23	6/20/2012	Gregory Krueger (Exelon)	Email	Don Vanover (ERIN)	Discussion of Work Directed by Counsel	Attorney Work Product
24	6/20/2012	Richard Dudley (NRC)	PDF	n/a	Materials Supporting Work Directed by Counsel	Attorney Work Product
25	4/6/2012	Philip Tarpinian (Exelon)	Email	Nancy Ranek (Exelon)	Discussion of Work Directed by Counsel and Transmittal of Supporting Documents	Attorney Work Product
26	4/6/2012	Philip Tarpinian (Exelon)	PDF	n/a	Materials Supporting Work Directed by Counsel	Attorney Work Product
27	4/6/2012	Philip Tarpinian (Exelon)	PDF	n/a	Materials Supporting Work Directed by Counsel	Attorney Work Product
28	5/30/2012	Philip Tarpinian (Exelon)	Email	Nancy Ranek (Exelon)	Work Directed by Counsel	Attorney Work Product

DOCUMENT NUMBER	DATE	AUTHOR / CUSTODIAN	DOCUMENT TYPE	TO	SUBJECT	BASIS FOR PRIVILEGE
29	5/30/2012	Philip Tarpinian (Exelon)	Spreadsheet	n/a	Work Directed by Counsel	Attorney Work Product
30	6/12/2012	Philip Tarpinian (Exelon)	Email	Don Vanover (ERIN)	Work Directed by Counsel	Attorney Work Product
31	6/13/2012	Don Vanover (ERIN)	Email	Don Macleod (ERIN)	Work Directed by Counsel	Attorney Work Product
32	6/11/2012	Don Vanover (ERIN)	Email	Philip Tarpinian (Exelon)	Work Directed by Counsel	Attorney Work Product