

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:)	
)	
EXELON GENERATION COMPANY, LLC)	Docket No. 50-352-LR
)	Docket No. 50-353-LR
(Limerick Generating Station, Units 1 and 2))	
		August 31, 2012

AFFIDAVIT OF CHRISTOPHER J. WEAVER

1. My name is Christopher J. Weaver. I am a Project Scientist in the Nuclear Program at the Natural Resources Defense Council (NRDC). I have been responsible for the collection of documents and data compilations 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 in this proceeding.

2. NRDC performed a search for documents, data, and all other relevant materials required by Section 2.336(a)(2).

3. As of August 31, 2012, NRDC has not found any new documents, data, or materials relevant to the proceeding to disclose. However, for purposes of clarity Attachment A to this submission relists those documents, data, and other relevant materials submitted with NRDC’s initial disclosure on July 2, 2012, but updated with a numbering system that will be consistent in future disclosures.

4. These disclosures are reasonably accurate and complete as of our last submission on July 31, 2012. The statements made above are true to the best of my knowledge and information.

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

A handwritten signature in black ink, appearing to read 'C. Jordan Weaver', positioned above a horizontal line.

C. Jordan Weaver
Natural Resources Defense Council
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(202) 289-6868

Executed August 31, 2012

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**UPDATED DISCLOSURES OF NATURAL RESOURCES
DEFENSE COUNCIL FILED PURSUANT TO 10 C.F.R. § 2.336(a)**

**ATTACHMENT A
(Documents Relevant to Contention E-1)**

DOCUMENT ID	TITLE, DESCRIPTION, & FILENAMES
1	AmerGen Energy Company, LLC (AmerGen). 2008. Applicant's Environmental Report – Operating License Renewal Stage: Three Mile Island Nuclear Station Unit 1, Appendix E – Severe Accident Mitigation Alternatives Analysis. U.S. NRC Docket No. 50-289. (FILE: THREEMILEISLAND_tmi-lra-appendix-e.pdf)
2	Bureau of Economic Analysis. 2011. Regional gross domestic product and personal income data was downloaded from the U.S. Department of Commerce Bureau of Economic Analysis website (http://www.bea.gov). (FILE: personal_income.xlsx)
3	U.S. Department of Agriculture (USDA). 2011. National Agricultural Statistics Service webpage (http://quickstats.nass.usda.gov/). (FILE: AG.xlsx)
4	U.S. Census Bureau (Census Bureau). 1990. Population totals by census tract from the 1990 Census were downloaded from the Center for Disease Control and Prevention 1990 Census data website (http://www2.cdc.gov/nceh/lead/census90/house11/download.htm). GIS data for the 1990 Census Tract boundary polygons were obtained from the U.S. Census Bureau's Census 1990:Census Tract Cartographic Boundary Files website (http://www.census.gov/geo/www/cob/tr1990.html). (FILES: 1990Census_DE_wgs84, 1990Census_MD_wgs84, 1990Census_NJ_wgs84, 1990Census_PA_wgs84, WITH FILE EXTENSIONS: .DBF, .PRJ, .SBN, .SBX, .SHP, .SHX, .DBF)
5	U.S. Census Bureau (Census Bureau). 2000. Population totals by census tract from the 2000 Census were downloaded from the Census Bureau's American Factfinder webpage (http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml) for the states of Delaware, Maryland, New Jersey and Pennsylvania. GIS data for the 2000 Census Tract boundary polygons were obtained from the U.S. Census Bureau's Census 2000:Census Tract Cartographic Boundary Files website (http://www.census.gov/geo/www/cob/tr2000.html). (FILES: bg10_d00, bg24_d00, bg34_d00, bg42_d00, WITH FILE EXTENSIONS: .DBF, .SHP, .SHX)
6	U.S. Census Bureau (Census Bureau). 2011. Population totals by census tract from the 2010 Census were downloaded from the Census Bureau's American Factfinder webpage (http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml) for the states of Delaware, Maryland, New Jersey and Pennsylvania. GIS data for 2010 Census tract boundary polygons were obtained from the U.S. Census Bureau's 2010 Tiger/Line Shapefile webpage (http://www.census.gov/geo/www/tiger/tgrshp2010/tgrshp2010.html). (FILES: DE_2010CENSUS_TRACTS_TOTALPOP, MD_2010CENSUS_TRACTS_TOTALPOP, NJ_2010CENSUS_TRACTS_TOTALPOP, PA_2010CENSUS_TRACTS_TOTALPOP, WITH FILE EXTENSIONS: .DBF, .PRJ, .SBN, .SBX, .SHP, .SHX, .DBF)

7	U.S. Census Monitoring Board: Presidential Members (Census Monitoring Board). 2001. Final Report to Congress, September 1. (FILE: FinalReport.pdf)
8	Constellation Energy. 2004. Applicant's Environmental Report – Operating License Renewal Stage: Nine Mile Point Nuclear Station Units 1 & 2, Appendix F – Severe Accident Mitigation Alternatives (SAMAs), June. (FILE: NINE_MILE_POINT_SAMA_ML041490222.pdf)
9	D.I. Chanin & W.B. Murfin. 1996. SAND96-0957, Site Restoration: Estimation of Attributable Costs from a Plutonium-Dispersal Accident, May. (FILE: Chanin and Murfin 1996 Site Restoration SAND96-0957.pdf)
10	D. Chanin & M.L. Young. 2008. NUREG/CR-6613, Vol. 1, Code Manual for MACCS2, User's Guide, May. (FILE: 481 MACCS2 Vol 1.pdf)
11	Energy Northwest. 2010. Columbia Generating Station License Renewal Application, Environmental Report, Attachment E: Severe Accident Mitigation Alternatives Analysis, January. (FILE: COLUMBIA_columbia-er.pdf)
12	Entergy Nuclear FitzPatrick, LLC, and Entergy Nuclear Operations, Inc. (Entergy). 2006a. James A. FitzPatrick Nuclear Power Plant --- License Renewal Application, Appendix E: Applicant's Environmental Report, Operating License Renewal Stage, Appendix G: Severe Accident Mitigation Alternatives, August. (FILE: FITZPATRICK_appendix-g.pdf)
13	Entergy Nuclear Generation Company (Entergy). 2006b. Applicant's Environmental Report – Operating License Renewal Stage: Pilgrim Nuclear Power Station, Attachment E – Severe Accident Mitigation Alternatives, January. (FILE: PILGRIM_environ-report_attach-e.pdf)
14	Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (Entergy). 2006c. Vermont Yankee Nuclear Power Station Applicant's Environmental Report Operating License Renewal Stage, Environmental Report, Attachment E: Severe Accident Mitigation Alternatives Analysis, January. (FILE: VERMONTYANKEE_environ-report_attach-ef.pdf)
15	Entergy Nuclear Generation Company (Entergy). 2011. Applicant's Environmental Report – Operating License Renewal Stage: Grand Gulf Nuclear Station Unit 1, Attachment E – Severe Accident Mitigation Alternatives Analysis, November. (FILE: GRANDGULF_ggns-er-attachment-e.pdf)
16	Exelon Generation Company, LLC (Exelon). 2001. License Renewal Application, Peach Bottom Atomic Power Station, Appendix E - Environmental Report, Appendix G: Severe Accident Mitigation Alternatives. (FILE: PEACHBOTTOM_peach_bottom-envg.pdf)
17	Exelon Generation Company, LLC (Exelon). 2003a. License Renewal Application, Dresden Nuclear Power Station and Quad Cities Nuclear Power Station, Appendix E - Dresden Nuclear Power Station Environmental Report, Appendix F: SAMA Analysis, January. (FILE: DRESDEN_SAMA.pdf)

18	Exelon Generation Company, LLC (Exelon). 2003b. License Renewal Application, Dresden Nuclear Power Station and Quad Cities Nuclear Power Station, Appendix F – Quad Cities Nuclear Power Station Environmental Report, Appendix F: SAMA Analysis, January. (FILE: QUADCITIES_ger06.pdf)
19	Exelon Generation Company, LLC (Exelon). 2005. License Renewal Application, Oyster Creek Generating Station, Environmental Report, Appendix F: Severe Accident Mitigation Alternatives. (FILE: OYSTERCREEK_14-ER_(AppE-70-AppF).pdf)
20	Exelon Generation Company, LLC (Exelon). 2011a. License Renewal Application, Limerick Generating Station Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85, June. (FILE: lgs-lra-web.pdf)
21	Exelon Generation Company, LLC (Exelon). 2011b. Applicant’s Environmental Report Operating License Renewal Stage, Limerick Generating Station, Units 1 and 2, Docket Numbers 50-352 and 50-353, License Numbers NPF-39 and NPF-85, June. (FILES: lgs-er-web.pdf, lgs-er-web-app-a.pdf, lgs-er-web-app-b.pdf, lgs-er-web-app-c.pdf, lgs-er-web-app-d.pdf, lgs-er-web-app-e.pdf,)
22	FirstEnergy Nuclear Operating Company (2010). Applicant’s Environmental Report – Operating License Renewal Stage: Davis-Besse Nuclear Power Station Unit 1, Attachment E – Severe Accident Mitigation Alternatives Analysis. (FILE: davis-besse-enviro.pdf)
23	Florida Power and Light. 2001. Applicant’s Environmental Report – Operating License Renewal Stage: St. Lucie Units 1 & 2, Appendix E – Severe Accident Mitigation Alternatives. (FILE: stlucieapplenv.pdf)
24	Florida Power and Light. 2008. Applicant’s Environmental Report – Operating License Renewal Stage, Duane Arnold Energy Center, Appendix F: SAMA Analysis, September. (FILE: DUANEARNOLD_daecer.pdf)
25	Government Accountability Office (GA). 2011. Report to Congressional Requesters. Nuclear Regulatory Commission: Oversight of Underground Piping Systems Commensurate with Risk, but Proactive Measures Could Help Address Future Leaks. GAO-11-563, June. (FILE: d11563.pdf)
26	KLD Associates, Inc. (KLD). 2003. Indian Point Energy Center Development of Evacuation Time Estimates, Rev. 0, May. (FILE: ML063460310.pdf)
27	R.E. Luna, H.R. Yoshimura, M.S. Soo Hoo. 2008. Survey of Costs Arising from Potential Radionuclide Scattering Events. WM2008 Conference, February 24-28, 2008, Phoenix, AZ, February. (FILE: AG-155-2007-005295.pdf)
28	Nebraska Public Power District. 2008. Cooper Nuclear Station, License Renewal Application, Appendix E: Applicant’s Environmental Report, Attachment E: Severe Accident Mitigation Alternatives Analysis, September. (FILE: COOPER_cooper-envir-rpt.pdf)
29	NextEra Energy Seabrook, LLC (2010). Applicant’s Environmental Report – Operating License Renewal Stage: Seabrook Station, Attachment F – Severe Accident Mitigation Alternatives. U.S. NRC Docket No. 50-

	443. (FILE: seabrook-er.pdf)
30	Nuclear Energy Institute (NEI). 2005. NEI-05-01, Rev. A., Severe Accident Mitigation Alternatives (SAMA) Analysis: Guidance Document. (FILE: ML060530203.pdf)
31	U.S. Nuclear Regulatory Commission (NRC). 1984. Final Environmental Statement Related to the Operation of Limerick Generating Station, Units 1 and 2. Philadelphia Electric Company. Docket Nos. 50-352 and 50-353. Office of Nuclear Reactor Regulation. NUREG-0974. Washington, DC. April. (FILE: ML11221A206.pdf)
32	U.S. Nuclear Regulatory Commission (NRC). 1989. Final Environmental Statement Related to the Operation of Limerick Generating Station, Units 1 and 2. Philadelphia Electric Company. Docket Nos. 50-352 and 50-353. Office of Nuclear Reactor Regulation. NUREG-0974 Supplement. August. (FILE: ML11221A204.pdf)
33	U.S. Nuclear Regulatory Commission (NRC). 2002. Memorandum To: William D. Travers, Executive Director for Operations, From: Ashok C. Thadani, Director, Office of Nuclear Regulatory Research, Subject: Closeout of Generic Safety Issue 172, Multiple System Responses Program, January 22. (FILE: ML020230055.pdf)
34	U.S. Nuclear Regulatory Commission (NRC). 1990. NUREG-1150, Severe Accident Risks: An Assessment for Five U.S. Nuclear Power Plants, December. (FILES: sr1150v1-intro-and-part-1.pdf, sr1150v1part-2.pdf, sr1150v1part-3.pdf)
35	U.S. Nuclear Regulatory Commission (NRC). 2007. Final License Renewal Interim Staff Guidance LR-ISG-2006-03: Staff Guidance for Preparing Severe Accident Mitigation Alternatives Analyses, August. (FILE: ML071640133.pdf)
36	U.S. Nuclear Regulatory Commission (NRC). 2011a. Recommendations for Enhancing Reactor Safety in the 21 st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident, July 12. (FILE: ML111861807.pdf)
37	Pacific Gas and Electric Company. 2009. Applicant's Environmental Report – Operating License Renewal Stage: Diablo Canyon Power Plant Units 1 & 2, Attachment F – Severe Accident Mitigation Alternatives Analysis. (FILE: dcpp-er.pdf)
38	PPL Susquehanna LLC (Susquehanna). 2006. Susquehanna Steam Electric Station Units 1 & 2 License Renewal Application, Environmental Report, Attachment E: Severe Accident Mitigation Alternatives. (FILE: SUSQUEHANNA_007_att_c-d-e-f_sses_fer(2).pdf)
39	Progress Energy. 2004. Brunswick Steam Electric Plant License Renewal Application, Environmental Report, Appendix F Severe Accident Mitigation Alternatives, October. (FILE: BRUNSWICK_brunswick_er_appendices_d-f.pdf)
40	PSEG Nuclear. 2009. Applicant's Environmental Report – Operating License Renewal Stage, Hope Creek

	Generating Station, Appendix E, SAMA Analysis, August. (FILE: hope-creek-envir-rpt.pdf)
41	James Shortle, David Abler, Seth Blumsack, Robert Crane, Zachary Kaufman, Marc McDill, Raymond Najjar, Richard Ready, Thorsten Wagener, and Denice Wardrop, Penn State - Pennsylvania Department of Environmental Protection. 2009. Pennsylvania Climate Impact Assessment, Report to the Department of Environmental Protection, June 29. (FILE: 7000-BK-DEP4252.pdf)
42	Southern Nuclear Operating Company. 2000. Licensing Renewal for the Edwin I. Hatch Nuclear Power Plant Units 1 and 2, Appendix D-Attachment F, Severe Accident Mitigation Alternatives, March. (FILE: HATCH_appendix-d-attach-a-f.pdf)
43	Tennessee Valley Authority. 2003. Applicant's Environmental Report Operating License Renewal Stage Browns Ferry Nuclear Power Plant Units 1, 2, and 3, Appendix E – Environmental Report, Attachment E-4, Severe Accident Mitigation Alternatives (SAMA) at the Browns Ferry Nuclear Plant, December. (FILE: BROWNSFERRY_env-bfn-2.pdf)
44	Xcel Energy Corporation. 2005. Monticello Nuclear Generating Plant, Application for Renewed Operating License, Appendix E – Environmental Report, Attachment F: Severe Accident Mitigation Alternatives, March. (FILES: MONTICELLOPART1_monticello-er3-9.pdf, MONTICELLOPART2_monticello-er3-9.pdf)
45	Hourly historical weather data from the Pottstown, Pennsylvania weather station, named KPTW, maintained by the Federal Aviation Administration. (FILES: KPTW_1999.XLSX, KPTW_2000.XLSX, KPTW_2001.XLSX, KPTW_2002.XLSX, KPTW_2003.XLSX, KPTW_2004.XLSX, KPTW_2005.XLSX, KPTW_2006.XLSX, KPTW_2007.XLSX, KPTW_2008.XLSX, KPTW_2009.XLSX, KPTW_2010.XLSX)
46	U.S. Nuclear Regulatory Commission (NRC). 2011b. Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 203 to Facility Operating License No. NPF-39, and Amendment No. 165 to Facility Operating License No. NPF-85, Exelon Generation Company, LLC, Limerick Generating Station, Units 1 And 2, Docket Nos. 50-352 And 50-353, July 29. (FILE: CrystalRiver_Unit3_ER-2008_Progress_Energy.pdf)
47	Progress Energy. 2008. Applicant's Environmental Report – Operating License Renewal Stage: Crystal River Unit 3, Appendix E – Severe Accident Mitigation Alternatives. U.S. NRC Docket No. 50-302. (FILE: Amendment_NRC_SafetyEvaluation_Limerick_July-29-2011.pdf)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Mandatory Disclosure Notice* in the captioned proceeding were served via the Electronic Information Exchange (EIE) on the 31st day of August 2012, which to the best of my knowledge resulted in transmittal of same to those on the EIE Service List for the captioned proceeding.

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/Signed (electronically) by/
Geoffrey H. Fettus

August 31, 2012