

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-COL |
| LLC |) | |
| |) | |
| (Calvert Cliffs Nuclear Power Plant, Unit 3) |) | |

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-proprietary 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 list of all new, relevant, proprietary documents is attached as Attachment B.

Respectfully submitted,

/s/ signed electronically by

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

Debbie L. Hendell
UniStar Nuclear Energy
750 E. Pratt Street, 14th Floor
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 November 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 via the Electronic Information Exchange (“EIE”) this 1st day of November 2012, which to the best of my knowledge resulted in transmittal of the foregoing to those on the EIE Service List for the captioned proceeding.

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

Debbie L. Hendell
UniStar Nuclear Energy
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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

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

CERTIFICATION OF SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1

I, Debbie L. Hendell, do hereby state as follows:

1. I am employed as Chief Counsel for UniStar Nuclear Energy. 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 September 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/ Debbie L. Hendell
Debbie L. Hendell
UniStar Nuclear Energy
750 E. Pratt Street, 14th Floor
Baltimore, MD 21202

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

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

| Doc No. | Document ID | Author | To | Other Recipients | Date | Subject | Attachments |
|---------|-------------|-----------------|-----------------------------|-------------------|-------------|---|-------------|
| 144 | 0016437 | Eifler, Laura R | Pitts Jr., Alfred | Gibson, Gregory T | 28-Sep-2012 | NAC Tutorial | |
| 145 | 0016452 | Eifler, Laura R | Jean-Baptiste Siprouchis | Hendell, Debbie | 5-Sep-2012 | Summary of call with NRC Public Affairs | |
| 145 | 0016486 | Eifler, Laura R | Jean-Baptiste Siprouchis | Hendell, Debbie | 13-Sep-2012 | FW: Platts Nucleonics Week | NW_20120913 |

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

| Doc No. | Document ID | Author | To | Other Recipients | Date | Subject | Attachments | Attorney-Client | Attorney Work Product |
|---------|-------------|-----------------|----------------|---|------------|---|--------------------|-----------------|-----------------------|
| 237 | 0016450 | Eifer, Laura R | Rozner, Joel D | Jean-Baptiste Sproudhis, Debbie Hendell | 5-Sep-2012 | RE: Confidential: ASLB Decisions in the matter of CC3 | ASLB Summary Final | | Yes |
| 238 | 0016641 | Sgarro, Rocco R | Massie, Wayne | | 4-Sep-2012 | RE: Aslb | | Yes | |