

EXHIBIT 2

PETITIONER'S REPLY TO RESPONDENTS' AND  
INTERVENOR'S RESPONSES TO PETITIONER'S MOTION TO  
SUPPLEMENT THE CERTIFIED INDEX OF THE RECORD

No. 14-1213 (D.C. Cir.)

Email from Richard E. Ayres to Charles Mullins  
March 22, 2015, 6:33pm

**From:** Richard E. Ayres [ayresr@ayreslawgroup.com](mailto:ayresr@ayreslawgroup.com)   
**Subject:** Request to Defer Filing Motion to Supplement the Record  
**Date:** March 22, 2015 at 6:33 PM  
**To:** Mullins, Charles [Charles.Mullins@nrc.gov](mailto:Charles.Mullins@nrc.gov)

RE

Chuck —

In the interest of reaching an agreement if possible, I want to make absolutely sure that we are both talking about the same thing. What we would like to have included in the record is **only** the portion of the change package that deals with seismic issues — Chapter 2.5. If that changes the agency's position, please let me know as soon as possible. I am attaching a copy of the part of the package we wish to have in the record.

Given the NRC's earlier motion to defer briefing, your somewhat leisurely response to my request to include the material from the change package in the record, and your current request that we defer filing a motion to supplement the record for 10 days, I must admit I am becoming concerned that delay may be the NRC strategy in this matter. I have to note that a more timely response to my request to include the material in the record might have avoided the scheduling problem you describe in your e-mail earlier today.

For this reason, I am not inclined to agree to defer filing our Motion to Supplement for 10 days. Our plan is to file the Motion on Tuesday, unless we hear from you by COB Monday that the NRC will agree to include the material we are requesting in the record.

Dick

*Richard Ayres*

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