

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

Morgan Lewis

Paul M. Bessette
Partner
202.739.5796
pbessette@morganlewis.com

June 1, 2015

Lawrence G. McDade, Chairman
Dr. Michael F. Kennedy
Dr. Richard E. Wardwell
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket: ***Entergy Nuclear Operations, Inc. (Indian Point Nuclear Generating Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR***

RE: **Notification Regarding Entergy Expert Witnesses**

Dear Administrative Judges:

The purpose of this letter is to inform the Atomic Safety and Licensing Board (“Board”) regarding certain changes in Entergy Nuclear Operations, Inc.’s (“Entergy”) expert witnesses supporting the Track 2 contentions and hearing. Entergy’s expert, Dr. Robert E. Nickell, passed away unexpectedly this past January. Entergy has retained three additional expert witnesses for the Track 2 contentions—Mr. Barry M. Gordon, Mr. Timothy J. Griesbach, and Dr. Randy G. Lott—and disclosed those witnesses to the other parties. For the Board’s information, enclosed is a copy of Entergy’s most recent monthly disclosure update listing all of Entergy’s Track 2 expert witnesses.

Administrative Judges
June 1, 2015
Page 2

Respectfully submitted,

Executed in accord with 10 C.F.R. § 2.304(d)

Paul M. Bessette, Esq.

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Phone: (202) 739-5796

Fax: (202) 739-3001

E-mail: pbessette@morganlewis.com

Counsel for Entergy Nuclear Operations, Inc.

cc: Service List

Enclosure

Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Tel. +1.202.739.3000
Fax: +1.202.739.3001
www.morganlewis.com

Kathryn M. Sutton

Partner
202.739.5738
ksutton@MorganLewis.com

Paul M. Bessette

Partner
202.739.5796
pbessette@MorganLewis.com

June 1, 2015

John J. Sipos
Assistant Attorney General
Environmental Protection Bureau
Office of the New York State Attorney General
State Capitol
Albany, NY 12224

Deborah Brancato
Staff Attorney
Riverkeeper, Inc.
20 Secor Road
Ossining, NY 10562

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

Re: Seventy-sixth Update to Disclosures Pursuant to 10 C.F.R. § 2.336; *Entergy Nuclear Operations, Inc.* (Indian Point Nuclear Generating Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR

Pursuant to 10 C.F.R. § 2.336 and the agreement among the parties, as submitted to the Atomic Safety and Licensing Board on January 13, 2009, Entergy Nuclear Operations, Inc. (“Entergy”) is providing this seventy-sixth update to its disclosures with respect to Contentions (1) NYS-25, (2) NYS-26B/Riverkeeper TC-1B, (3) NYS-35/36, and (4) NYS-38/RK-TC-5, as admitted by the Board on July 31, 2008 (LBP-08-13), November 4, 2010, July 6, 2011, and November 10, 2011.

Entergy’s seventy-sixth update to the disclosures consists of the following:

- Enclosure 1 lists the names, addresses, and telephone numbers of persons upon whose opinion Entergy may base its positions on the contentions and upon whom Entergy may rely

John J. Sipos
Deborah Brancato
Sherwin Turk
June 1, 2015
Page 2

as a witness. The bases for these opinions are provided in Enclosures 2, 3, and 4 of previous disclosures and supplements thereto. Entergy will continue to update Enclosure 1 if and when it identifies additional witnesses or changes thereto.

- Enclosure 2 is reserved for a description by category and location of all relevant non-privileged documents, data compilations, and tangible things in the possession, custody, or control of Entergy that may be relevant to the admitted contentions in this proceeding.
- Enclosure 3 is reserved for an index of documents, data compilations, or tangible things that may be relevant to the contentions but that contain proprietary information, Sensitive Unclassified Non-Safeguards Information (“SUNSI”), or otherwise protected information.
- Enclosure 4 provides an index of relevant documents that are otherwise publicly available.

In order to compile these Enclosures, a reasonable search was conducted of documents in Entergy’s possession, custody, or control. We are attaching an affidavit, which attests that all relevant materials identified by this search have been disclosed and that the disclosures are accurate and complete as of May 20, 2015. We will supplement this disclosure with our next disclosure update, which will include any additional relevant documents and witnesses for any hearing on the contentions to the extent Entergy identifies them. Entergy will update these disclosures within 30 days of the date of this letter, as required by 10 C.F.R. § 2.336(d), and pursuant to the joint agreement among the parties on mandatory disclosures.

Entergy has been conservative in identifying documents for inclusion in Enclosures 2, 3, and 4. By identifying documents on those Enclosures, Entergy does not necessarily concede that the documents are in fact relevant or material to the admitted contentions. As we indicated to you previously, in order to facilitate your review of these disclosures, we have made a good faith effort to identify the contention number(s) to which each record is responsive. In the event that a record appears to be responsive to two or more contentions, we have indicated that the record is “generally applicable.” These determinations, however, do not constitute an admission that each and every record is necessarily responsive to that contention or contentions identified, and documents may be responsive to additional contentions not necessarily identified. In addition, Entergy is continuing to review those documents listed on Enclosure 2 to determine whether they contain proprietary information. To the extent Entergy determines that additional documents contain proprietary information, Entergy will continue to update Enclosures 2 and 3 accordingly.

John J. Sipos
Deborah Brancato
Sherwin Turk
June 1, 2015
Page 3

Sincerely,

Signed (electronically) by Paul M. Bessette

Kathryn M. Sutton, Esq.

Paul M. Bessette, Esq.

Counsel for Entergy Nuclear Operations, Inc.

Enclosures

cc: Melissa-Jean Rotini
Daniel Riesel
Victoria Treanor
Robert D. Snook
Michael J. Delaney
Sean Murray
Jay Goodman
Robert Loughney
Manna Jo Greene

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-247-LR and
)	50-286-LR
ENTERGY NUCLEAR OPERATIONS, INC.)	
)	
(Indian Point Nuclear Generating Units 2 and 3))	
)	June 1, 2015

AFFIDAVIT

1. My name is John J. Curry. My title is Project Manager, Entergy Nuclear Operations, Inc. (“Entergy”). Working with the attorneys for Entergy, 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. This Affidavit relates to the disclosures that Entergy is providing on June 1, 2015, in the above-captioned proceeding pursuant to 10 C.F.R. § 2.336, and the agreement among the parties, as submitted to the Atomic Safety and Licensing Board on January 13, 2009.
3. A search was conducted of documents, data compilations, and tangible things potentially relevant to the admitted contentions under the custody and control of Entergy for the types of information specified in 10 C.F.R. § 2.336(a). As provided in 10 C.F.R. § 2.336(c), this search was conducted based on information and documents reasonably available to Entergy:
 - a. The searches encompassed both electronic and paper documents.
 - b. The searches encompassed Indian Point Nuclear Generating Units 2 and 3 license renewal-related files and documents in the possession and control of individuals

who have worked on the IP2 and IP3 license renewal project, including contractors to Entergy to the extent that they and their employees worked on the IP2 and IP3 license renewal project.

- c. Searches did not encompass documents in the possession of individuals who did not work on the IP2 and IP3 license renewal project or files unrelated to the IP2 and IP3 license renewal project.
4. Enclosure 2 is reserved for an index of relevant non-privileged, non-protected documents, data compilations, and tangible things that were located as a result of this search.
5. Enclosure 3 is reserved for an index of relevant documents, data compilations, and tangible things containing proprietary-related information.
6. Enclosure 4 provides an index of relevant documents, data compilations, and tangible things that are publicly available.
7. Entergy has identified documents for inclusion in Enclosure 4. By identifying documents on this Enclosure, Entergy does not necessarily concede that the documents are in fact relevant or material to the admitted contentions.
8. These disclosures are accurate and complete as of May 20, 2015.

I declare under penalty of perjury that the foregoing information, whether known to me personally or supplied to me by others upon whom I have relied, is true and accurate, to the best of my knowledge, information, and belief.

Executed in Accord with 10 C.F.R. § 2.304(d)

John J. Curry
Project Manager
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway
Buchanan, NY 10511
Phone: 914-254-7776
Email: jcurry2@entergy.com

Executed this 1st day of June 2015.

ENCLOSURE 1

ENTERGY WITNESSES

The name and, if known, the address and telephone number of any person, including any expert, upon whose opinion the party bases its claims and contentions and may rely upon as a witness:

Response:

Nelson F. Azevedo (NYS-25, NYS-26B/RK TC-1B, NYS-38/RK TC-5)
Entergy Nuclear Generation Co.
295 Broadway, Suite 1
Buchanan, NY 10511
914-254-6775

Alan B. Cox (NYS-25, NYS-26B/ RK TC-1B, NYS-38/RK TC-5)
Entergy License Renewal Services (Retired)
1448 SR 333
N-GSB-45
Russellville, AR 72802
479-858-3173

Robert J. Dolansky (NYS-25, NYS-38/RK TC-5)
Entergy Nuclear Generation Co.
295 Broadway, Suite 1
Buchanan, NY 10511
914-254-6737

Mark A. Gray (NYS-26B/RK TC-1B, NYS-38/RK TC-5)
Westinghouse Electric Company LLC
Nuclear Services
1000 Westinghouse Drive
Cranberry Township, PA 16066
412-374-4602

Barry M. Gordon (NYS-38/RK TC-5)
Structural Integrity Associates, Inc.
5215 Hellyer Avenue, Suite 210
San Jose, CA 95138-1025
408-978-8200

Timothy J. Griesbach (NYS-25, NYS-38/RK TC-5)
Structural Integrity Associates, Inc.
5215 Hellyer Avenue, Suite 210
San Jose, CA 95138-1025
408-978-8200

Ted S. Ivy (NYS-25)
Entergy License Renewal Services
Entergy Nuclear Inc.
1448 S.R. 333
N-GSB-45
Russellville, AR 72802

Dr. Randy G. Lott (NYS-25, NYS-26B/RK TC-1B, NYS-38/RK TC-5)
Westinghouse Electric Company LLC
Nuclear Services
1000 Westinghouse Drive
Cranberry Township, PA 16066
412-374-4157

Dr. Robert E. Nickell* (NYS-25, NYS-26B/RK TC-1B, NYS-38/RK-TC-5)
Applied Science & Technology
4043 Porte de Palmas, Unit 97
San Diego, CA 92122
619-255-9930

Jack R. Strosnider (NYS-25, NYS-26B/RK TC-1B, NYS-38/RK TC-5)
Talisman International, LLC
9712 Breckenridge Pl.
Montgomery Village, MD 20886
202-471-4244

Entergy will update this disclosure if and when it has identified additional persons that it may use as witnesses.

* Dr. Nickell passed away unexpectedly on January 21, 2015.

A copy of the analysis or other authority upon which that person bases his or her opinion:

Response:

In addition to the documents identified in Entergy's initial and updated mandatory disclosures, the analyses and authorities upon which the persons identified above base their opinions are included in Entergy Exhibits ENTR14001 through ENT000614.

DB1/83580510.1

Entergy-Indian Point License Renewal Proceeding
 Seventy-sixth Publicly Available Log
 June 1, 2015

NO.	DATE	CATEGORY	SUBJECT MATTER/DESCRIPTION	CONTENTION
1714	3/6/2015	Amendment	Union Electric Co., Docket No. STN 50-483, Callaway Plant Unit No. 1, Renewed Facility Operating License, Renewed License NPF-30 (ML053110040)	NYS-38/RK-TC-5
1715	10/20/2014	Amendment	Exelon Generation Co., LLC, Docket No. 50-352, Limerick Generating Station, Unit 1, Renewed Facility Operating License (ML052780034)	NYS-38/RK-TC-5
1716	10/20/2014	Amendment	Exelon Generation Co., LLC, Docket No. 50-353, Limerick Generating Station, Unit 2, Renewed Facility Operating License (ML052780037.)	NYS-38/RK-TC-5
1717	9/16/2013	Report	Final Safety Evaluation Report for WCAP-17577, Rev. 2 (ML13248A423)	NYS-26B/RK-TC-1B; NYS-38/RK-TC-5
1718	6/17/2013	Report	WCAP-17577-NP, Rev. 2, "Topical Report on ASME Section III Piping and Component Fatigue Analysis Utilizing the WESTEMS Computer Code" (ML13170A026)	NYS-26B/RK-TC-1B; NYS-38/RK-TC-5

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-247-LR and
)	
ENTERGY NUCLEAR OPERATIONS, INC.)	50-286-LR
)	
(Indian Point Nuclear Generating Units 2 and 3))	
)	June 1, 2015

CERTIFICATE OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I certify that, on this date, a copy of Entergy's letter to the Administrative Judges was served upon the Electronic Information Exchange (the NRC's E-Filing System), in the above-captioned proceeding.

Signed (electronically) by Raphael P. Kuyler
Raphael P. Kuyler, Esq.
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
Phone: (202) 739-5146
Fax: (202) 739-3001
E-mail: rkuyler@morganlewis.com