

March 3, 2017

**BY OVERNIGHT AND ELECTRONIC MAIL**

John R. Thornburgh II, Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP  
1440 New York Avenue, N.W.  
Washington, D.C. 20005-2111

RE: *United States of America v. Energy Solutions, et al.*, No. 16-cv-0156-GMS (D. Del.);  
NRC File No. TR-17-01.

Dear Mr. Thornburgh:

Enclosed is a DVD containing documents responsive to requests nos. 3-4 and 6-8 set forth in the "amended schedule A" provided to the Nuclear Regulatory Commission on February 7, 2017. These documents are bates-stamped NRC4-0001 through NRC4-1910.

At this point, following our outreach to potentially affected employees and based on our understanding of your requests (as explained in prior correspondence), we have provided copies to you of all the nonprivileged responsive material that we have been able to locate. In the event that agency employees locate additional materials, we will provide them to you promptly. But in the absence of such discovery, we will consider our response to your subpoena for documents complete.

Sincerely,

*/RA/*

Andrew P. Averbach  
Solicitor

Enclosure: As stated (via overnight mail)

cc: Anurag Maheshwary, Esq.  
Charles E. Mullins, Esq. (by electronic mail only, w/o enclosure)

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