

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	Docket Nos.	50-255-LT
	)		50-155-LT-2
Entergy Nuclear Operations, Inc.,	)		72-007-LT
Entergy Nuclear Palisades, LLC,	)		72-043-LT-2
Holtec International, and	)		
Holtec Decommissioning International, LLC	)	ASLBP No.	22-974-01-LT-BD01
(Palisades Nuclear Plant and Big Rock Point Site)	)		

**CERTIFICATION OF INITIAL MANDATORY DISCLOSURES**  
**PURSUANT TO 10 C.F.R. § 2.336**

Pursuant to 10 C.F.R. § 2.336 and the scheduling and case management order regarding mandatory disclosures dated August 31, 2022, Entergy Nuclear Operations, Inc., Entergy Nuclear Palisades, LLC, Holtec International, and Holtec Decommissioning International, LLC (Applicants) have made, via email to counsel for the Michigan Attorney General, their initial mandatory disclosures with respect to admitted portions of the Attorney General’s Contention MI-1. Attached are the affidavits required by § 2.336(d) for the Entergy and Holtec parties.

Applicants have been conservative in identifying and producing certain documents in their initial disclosures. By identifying or producing documents in their disclosures, Applicants do not necessarily concede that the documents are in fact relevant or material to the admitted contentions.

Respectfully submitted,

/Executed in accord with § 2.304(d)/

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Counsel for Entergy Nuclear Operations,  
Inc. and Entergy Nuclear Palisades, LLC

/Signed electronically by Jason Tompkins/

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Counsel for Holtec International and Holtec  
Decommissioning International, LLC

Dated: October 14, 2022

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(Palisades Nuclear Plant and Big Rock Point Site)	)		

**AFFIDAVIT OF JASON DAY  
CERTIFICATION OF INITIAL DISCLOSURES**

I, Jason Day, hereby state as follows:

I am General Counsel of Holtec Decommissioning International, LLC (HDI), representing Holtec International and HDI (collectively “Holtec”) in this proceeding. My business address is 1 Holtec Boulevard, Camden, NJ 08104. I am authorized to provide this certification, pursuant to 10 C.F.R. § 2.336(c), on behalf of Holtec.

To the best of my knowledge, information and belief, Holtec’s initial disclosures in the above-captioned proceeding contain all materials required to be disclosed by 10 C.F.R. § 2.336(a), as modified by the Board’s Mandatory Disclosures Order,<sup>1</sup> that were identified as relevant to the admitted contentions through a search of the information and documentation reasonably available to Holtec.

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<sup>1</sup> Order (Protocols Governing Mandatory Disclosures) (August 31, 2022).

Further, to the best of my knowledge, information, and belief, and based on representations of personnel who were instructed to perform a diligent search, these disclosures are accurate and complete as of this date.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

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

Jason Day  
General Counsel  
Holtec Decommissioning International  
Krishna P. Singh Technology Campus  
1 Holtec Boulevard  
Camden, NJ 08104  
Tel. (856) 797-0900 Ext. 3688  
Email: j.day@holtec.com

Executed in Camden, NJ  
this 14<sup>th</sup> day of October, 2022

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NUCLEAR REGULATORY COMMISSION**

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Holtec Decommissioning International, LLC	)	ASLBP No.	22-974-01-LT-BD01
(Palisades Nuclear Plant and Big Rock Point Site)	)		

**AFFIDAVIT OF SUSAN H. RAIMO  
CERTIFICATION OF INITIAL DISCLOSURES**

I, Susan H. Raimo, hereby state as follows:

I am Associate General Counsel with Entergy Services, LLC, representing Entergy Nuclear Palisades, LLC and Entergy Nuclear Operations, Inc. (“Entergy”) in this proceeding. My business address is 101 Constitution Ave., NW, Suite 200 East, Washington, D.C. 20001. I am authorized to provide this certification, pursuant to 10 C.F.R. § 2.336(c), on behalf of Entergy.

To the best of my knowledge, information and belief, Entergy’s initial disclosures in the above-captioned proceeding contain all materials required to be disclosed by 10 C.F.R. § 2.336(a), as modified by the Board’s Mandatory Disclosures Order,<sup>2</sup> that were identified as relevant to the admitted contentions through a search of the information and documentation reasonably available to Entergy.

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<sup>2</sup> Order (Protocols Governing Mandatory Disclosures) (August 31, 2022).

Further, to the best of my knowledge, information, and belief, and based on representations of personnel who were instructed to perform a diligent search, these disclosures are accurate and complete as of this date.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

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

Susan H. Raimo, Esq.  
Associate General Counsel  
Entergy Services, LLC  
101 Constitution Avenue, N.W., Suite 200 East  
Washington, D.C. 20001  
Tel. 202-530-7330  
Email: sraimo@entergy.com

Executed in Washington, D.C.  
this 14<sup>th</sup> day of October, 2022

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Holtec Decommissioning International, LLC	)	ASLBP No.	22-974-01-LT-BD01
(Palisades Nuclear Plant and Big Rock Point Site)	)		

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Certification of Initial Mandatory Disclosures has been served through the E-filing system on the participants in the above-captioned proceeding, this 14th day of October, 2022.

Respectfully submitted,

/Signed electronically by Jason Tompkins/  
Jason B. Tompkins  
BALCH & BINGHAM LLP  
1710 Sixth Avenue North  
Birmingham, AL 35203-2015  
(205) 226-8743  
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Dated: October 14, 2022