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January 20, 2005

Administrative Judge Alex S. Carlin, Chair
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge Lester S. Rubenstein
Atomic Safety and Licensing Board Panel
4270 E. Country Villa Drive
Tuscon, AZ 85718

DOCKETED
USNRC

Administrative Judge Anthony J. Baratta
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

January 21, 2005 (8:09 am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

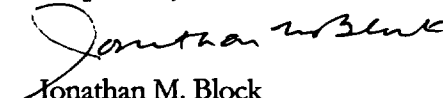
Re: Docket No. 50-271-OLA/ASLB No. 04-832-02-OLA

Dear Administrative Judges:

This letter is to confirm to the Atomic Safety and Licensing Board Panel for this proceeding, that New England Coalition complied on this day with 10 CFR § 2.336 regarding the general discovery obligations of parties. Attached here to please find attached a copy of New England Coalition's Certificate of Disclosure, transmittal letter to the parties, and list of disclosures.

New England Coalition made its disclosures to all parties, whether the party has taken or not taken a position on any of New England Coalition's admitted contentions.

Respectfully submitted,


Jonathan M. Block
Counsel to New England Coalition

cc: Anthony Z. Roisman, Esq., Sarah Hofmann, Esq.
Marisa Higgins, Esq., Brooke Poole, Esq., Robert Weisman, Esq.
Jay E. Silberg, Esq., John M. Fulton, Esq., Douglas J. Rosinski, Esq.
Raymond Shadis, OCAA, Office of the Secretary, Matias Travieso-Diaz, Esq.

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of

ENTERGY NUCLEAR VERMONT
YANKEE, LLC and ENTERGY
NUCLEAR OPERATIONS, INC.
(Vermont Yankee Nuclear Power Station)

Docket No. 50-271

ASLBP No. 04-832-02-OLA
(Operating License Amendment)

CERTIFICATE OF SERVICE

I hereby certify that copies of New England Coalition's initial discovery disclosures and certification of New England Coalition's initial discovery disclosures – declaration of Raymond G. Shadis-- were served on the persons listed below by deposit in the U.S. mail, first class, postage prepaid, and where indicated by an asterisk by electronic mail, this 20th day of January, 2005.

Persons listed below with a '**' also received hard-copies of disclosed documents.

*Administrative Judge
Alex S. Karlin, Chair
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*Secretary
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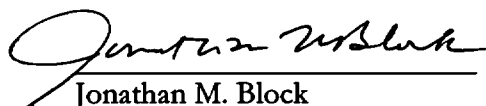
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January 20, 2005

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Montpelier, VT 05620-2601

Re: Docket No. 50-271-OLA/ASLBP No. 04-832-02-OLA

To Parties' Counsel:

Enclosed please find New England Coalition's disclosures pursuant to 10 CFR §2.336, a Certificate of Disclosure, a Certificate of Service, and a copy of a letter to the Board indicating our compliance.

Pursuant to 10 CFR § 2.336(a)(1), at this time the persons "upon whose opinion [NEC] bases its claims and contentions and may rely upon as a witness," are Arnold Gundersen and Paul Blanch. Their addresses and telephone numbers are:

Arnold Gundersen
139 Killarney Drive
Burlington, VT 05401
802-865-9955

Paul M. Blanch
135 Hyde Road
West Hartford, CT 06117
860-236-0326

As of this date, Mr. Gundersen and Mr. Blanch expect to rely upon the information in their possession included in the attached Disclosures as the bases for their respective opinions. If and when

additional relevant information comes into New England Coalition's possession, disclosure shall be made as required by 10 CFR § 2.336.

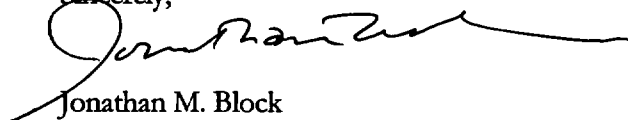
New England Coalition has provided lists of all documents produced in hard copy to the parties. Voluminous documents, documents New England Coalition believes are already available to the parties, and public documents available from the NRC website and/or ADAMS have been listed as such but not provided to the parties in hard copy. There are no documents generated by New England Coalition for which it makes a proprietary claim. However, a report prepared for New England Coalition by John W. Hubenthal (May 13, 2003) –on New England Coalition's disclosure list at number 40– is copyrighted material belonging to New England Coalition. As such, New England Coalition requests that parties who wish to make additional copies of the report request written permission from New England Coalition prior to doing so and agree to destroy all copies at the end of the proceedings in this matter.

New England Coalition has in its possession documents (e-mails and letters) that are privileged attorney-client material. New England Coalition understands that the Vermont Department of Public Service, Entergy and the NRC Staff have reached an agreement that this material is not subject to disclosure and that a privilege log for this material is not necessary. NEC concurs in that aspect of the agreement reached by DPS, Entergy and NRC Staff.

If a party upon whom disclosure is required wishes to come and view disclosed but not provided voluminous materials kept in New England Coalition's files, please call my office so we may schedule a mutually convenient time during normal business hours for such inspection. In the event a party viewing documents wishes to copy them, copies are available on a cash basis (\$.10/single sided page) at the local printer with whom New England Coalition has an account.

Please call or e-mail me if you have trouble accessing any of the information described and I will try to assist in providing you with access to the information.

Sincerely,


Jonathan M. Block
Counsel for New England Coalition

cc: Administrative Judge Alex S. Karlin
Administrative Judge Anthony J. Baratta
Administrative Judge Lester S. Rubenstein
Office of the Secretary
OCAA
John M. Fulton, Esq.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of Docket No. 50-271
ENTERGY NUCLEAR VERMONT
YANKEE LLC AND ENTERGY NUCLEAR
OPERATIONS, INC.
(Vermont Yankee Nuclear Power Station)

ASLBP No. 04-832-02-OLA

January 20, 2005

**NEW ENGLAND COALITION'S
DISCLOSURE OF DOCUMENTS PURSUANT TO 10 C.F.R. §2.336**

1. VY Nuclear Power Corp., Preventive Maintenance Basis (M307), Rev. 6, "Cooling Tower" (n.d.) (Bates Stamped CT00977-CT00986) 10 pages.
2. E-mail, Goodwin, Scott, to O'Brien, Michael, re: TPI Addendum 1 Deliverable (December 18, 2002) (Bates Stamped CT00203) 1 page. Attached to the Goodwin email is a TPI Report excerpt, re: cooling tower study, (Bates Stamped CT00205-CT00207) 3 pages.
3. E-mail, Yasi, Dan to Engerbreth, Norman, re: Summary of Request for VY CT upgrade (June 4, 2004) (Bates Stamped CT00208) 1 page.
4. E-mail, Thomas, George to Tessier, Mike, re: Cooling Tower Cost Estimate (June 8, 2004). Attached to Thomas email is Tower Performance, Inc., "Vermont Yankee Cooling Tower Study - Addendum 1," (n.d.) (Bates Stamped CT00239-CT00241) 3 pages.
5. Marley Cooling Technologies, "Cooling Tower Fan Upgrade," Marley/Ecodyne Model 70-1 (June 25, 2004) (Bates Stamped CT00210-CT00212) 3 pages.
6. Email, Yasi, Dan to Yasi, Dan, re: FW: Marley Telecon on Cooling Tower Structural Issues (June 23, 2004) (Bates Stamped CT00137-CT00140) 4 pages.
7. Fulkerson, Robert, "Vermont Yankee Nuclear Power Station Technical Review of Cooling Tower Upgrade Design Studies," Submitted by TPI and S&W (February 18, 2003) (Bates Stamped CT00652-CT00659) 8 pages.
8. Project Definition Document, Subject: Cooling Tower Fan/Motor Replacement, (n.d.) (Bates Stamped CT00010-CT0023) 14 pages.
9. VY EPU Cooling Tower Upgrade Economic Evaluation (May 20, 2003) (Bates Stamped CT00541-CT00569) 29 pages.

10. E-mail, Routhier, Rick to Yasi, Dan, re: Bus 5 cables (June 10, 2004) (Bates Stamped CT 00114). This Routhier email attaches a forwarded email from Alex Wonderlick to Chris Kowal and Chris Wamser re Bus 5 cables, 1 page.
11. E-mail, Yasi, Dan to Madden, Theodore, re: DRAFT Telecon Notes 040103, SRV Transients and ATWS Analyses (April 1, 2003) (Bates Stamped 008461-008462) 2 pages.
12. E-mail, Anvari, Jay to Sienel, Beth, re: Top Ten Action Plan (March 16, 2004) (Document # A-184) 5 pages. Anvari email attaches document by Murphy, Leonard, SCH-1 Top Ten Reliability Action Plan (February 3, 2004) 4 pages.
13. E-mail, Hamer, Mike to Scholl, Larry, re: Mods List (April 4, 2004) (Document # A-231) 1 page. Attached to the Hamer email are the following documents:
 - a. Low Feedwater Suction Pressure Trip, 4 pages
 - b. AST Mods (Install SJAЕ Line Check Valve), 4 pages
 - c. Add Main Steam Safety Valve, 2 pages
 - d. Recirc Pump Runback (Feedwater Pump Trip), 4 pages
 - e. APRM Flow Controlled Trip Reference Card (A/M), 2 pages
 - f. NSSS/BOP Instruments (Main Steam High Flow Trip), 4 pages
 - g. 345 kv 381 Line Overload Relay Setting, 4 pages
 - h. Flow Induced Vibration Monitoring, 2 pages.
14. E-mail, Lukens, Larry to Pelton, David, re: MSIV LLRT Adverse Trend (May 6, 2004) (Document # A-201) 1 page. Attached to the Lukens e-mail is CR-VTY-2004-0918, Adverse Trend Common Cause Analysis Report (May 5, 2004) 31 pages.
15. Position Paper Concerning the As-Found LLRT of V23-3 & V23-4, Ref: PP 7006, Primary Containment Leak Rate Testing Program (PCLRTP) R 2001-0901, 2 pages.
16. E-mail, Yasi, Dan to Hobbs, Brian, re: VY Water Systems - PUSAR Headings (June 20, 2003) (Bates Stamped 008240) 1 page.
17. Yankee Atomic Electric Company, VY Reactor Vessel Cyclic Limits, Table 1 and References (March 1988), 2 pages; Memorandum from E.J. Betti to S.R. Miller re: Recommendation for Tracking/Limiting Reactor Transient Events (December 14, 1987). Attached to Memo is the "Recommendation for Tracking/Limiting Reactor Transient Events for VY Nuclear Power Station" (November 13, 1987) and Table of Contents, 3 pages.
18. E-mail, Leach, Don to Nichols, Craig, re: Klaproth discussion (December 18, 2002) 1 page. The following documents are attached:
 - a. Entergy Nuclear Operations, Inc, Vermont Yankee Power Uprate Project, Notes of Telecon, re: Status of Constant Pressure power Uprate Licensing Topical Report (CLTR) and NRC Review Process Issues, (January 8, 2003), 2 pages.

- b. Entergy Nuclear Operations, Inc, Vermont Yankee Power Uprate Project, Notes of Telecon, re: Debrief of GE/USNRC Phone call on CLTR licensing status, (January 16, 2003), 1 page.
 - c. Letter, GE Nuclear Energy to U.S. NRC (January 14, 2003) re: NRC Approval SE for GE Licensing Topical Report NEDC-33004P, Constant Pressure power Uprate, Revision 2 (TAC No. MB 2510), 3 pages. Another copy of this letter is included, (Bates Stamped 005527--005529), 3 pages.
19. E-mail, Bruster, Laird to Felumb, Rhonda, re: VY Main Steam Comment Resolutions (February 18, 2003) (Bates Stamped 008315-008323) 9 pages.
20. E-mail, Traft, Allan to Felumb, Rhonda, re: WPS 1.4.5.3 Resolutions (Bates Stamped 008070-008079) 10 pages.
21. E-mail, Wilverding, George to Devincentis, Jim and others, re: Meeting minutes BWR 2003-04, 03/18/03 (March 18, 2003) 1 page.
22. Entergy, Vermont Yankee Extended Power Uprate, Task Scope Document, Task T1006: Individual Plant Evaluation (IPE)/IPEEE (June 11, 2003) prepared by Michael Jacobs, Approved by Mark Palionis (Bates Stamped 004792-004798) 7 pages. The following documents are included in the IPE:
- a. Riskman Model-Case Form, Model-Case ID: VY02, Rev 5, "VY02 Basecase Model with Modifications to CET Split Fraction Rules for Top Events VD and HR (June 19, 2003) (Bates Stamped 004799-004800) 2 pages.
 - b. Attachments 1-7 (Bates Stamped 004801-004808) 8 pages.
 - c. Attachment 2, IPE, Draft Task Report Review Checklist (n.d.) (Bates Stamped 004809) 1 page.
 - d. Memorandum, V.M. Anderson to Mark Palionis (June 11, 2003), re: Review of VY EPU Shutdown Risk Impact (Bates Stamped 004810) 1 page. Attached to the Anderson memo is Appendix B, "Impact of 20% EPU on Shutdown Operator Action Response Times" (September 26, 2003) (Bates Stamped 004811-004826) 16 pages. All of these documents are repeated as Bates Stamped 004867-004883.
 - e. Attachment 3, IPE, Final Task Report Review Checklist (n.d.) (Bates Stamped 004827) 1 page.
 - f. Attachment 10, IPE, Final Task Report, Task Owner Checklist (n.d.) (Bates Stamped 004828) 1 page.
 - g. Entergy, VY EPU, Task Scope Document, Task T1006: IPE (draft) (n.d.) (Bates Stamped 004829-004835) 7 pages.
 - h. Entergy, VY EPU, Task Scope Document, Task: T1006: IPE (June 11, 2003) (Bates Stamped 004836-004842) 7 pages.
 - i. Memorandum, V.M. Anderson to Mark Palionis (May 2, 2003), re: Review of ERIN Understanding of VY PRA Success Criteria (Bates Stamped 004843) 1 page. The following Tables labeled "Key Safety Functions and Minimum System Requirements For Success (Level 1)": are attached:

- i. Table 1, Initiating Event: General Transients (Bates 004844-004845) 2 pages.
 - ii. Table 2, Initiating Event: Small Loca (Bates Stamped 004846-004847) 2 pages.
 - iii. Table 3, Initiating Event: Medium Loca (Bates Stamped 004848-004849) 2 pages.
 - iv. Table 4, Initiating Event: Large Loca (Bates Stamped 004850-004851) 2 pages.
 - v. Table 5, Initiating Event: ATWS (Bates Stamped 004852004854) 3 pages.
 - vi. Table 6, Key Safety Functions and Minimum System Requirements for Success (Level 2) (Bates Stamped 004855-004857) 3 pages.
- j. Memorandum, V.M. Anderson to Mark Palionis (May 23, 2003), re: Review of VY EPU Operator Action Screening (Bates Stamped 004858-004859) 2 pages. Attached to the Anderson memo is a table summarizing operator action screening for VY EPU Risk Assessment (September 26, 2003) (Bates Stamped 004860-004866) 7 pages.
- k. Attachment D with Figures 11 and 12, Annual Capacity Factors, and Figure 13, 3-Year AVG. Capacity Factor vs. Time (Bates Stamped 004884-004887) 4 pages.
23. E-mail, Nichols, Craig to Thayer, Jay, re: J[ay]T[hayer]/D[on]L[each] discussion with John Zwolinski – 12/11/02, (December 17, 2002), (Bates Stamped 005367-005368) (This Nichols e-mail attaches a previous e-mail from Don Leach to Jay Thayer and others and requests comments on that message from the recipients.) 2 pages.
24. E-Mail, Nichols, Craig to Thayer, Jay and others, re: notes from NRC Kickoff meeting, (December 17, 2002), (Bates Stamped 005364-005366). This Nichols e-mail attaches a previous e-mail from Leach, Don to Hobbs, Brian, (same date), re: Basis for Control Room Leakage and requests comments on that message. This Leach e-mail contains “critical notes/actions [from] the meeting” and attaches a previous e-mail from Hobbs, Brian to Perez, Pedro and others, (December 16, 2002), (same subject). This Hobbs e-mail attaches a previous e-mail from Perez, Pedro to Rogers, James and others, (same date and subject) 3 pages.
25. E-mail, Nichols, Craig to Hobbs, Brian, re: FW: ENVY News, Thursday, December 19, 2002.doc, (December 19, 2002), (Bates Stamped 005515-005518). This Nichols e-mail attaches a previous e-mail from Nichols, Craig to Dick, Michael J., (same date and subject) 4 pages.
26. E-mail, Nichols, Craig to Hobbs, Brian, re: FW:CLTR + San Jose, (January 2, 2003), (Bates Stamped 005110-005111) This Nichols e-mail attaches a previous email from Dick, Michael to Nichols, Craig, (December 20, 2002), (same subject). This Dick e-mail attaches a previous e-mail from Nichols, Craig to Hoang, Hoa X. and others, (same date and subject) 2 pages.
27. E-mail, <laird.bruster@swec.com> to Hobbs (and others), re: 2-11-02 POD Minutes, (February 11, 2002), (Bates Stamped 008516-008520). This e-mail attaches a previous e-mail from Hobbs, Brian to Nichols, Craig and others (same date and subject) 5 pages.
28. Letter, Entergy to GE Nuclear, (January 15, 2003), GE and NRC at impasse on CLTR, (Bates Stamped 005369) 1 page.

29. Entergy, EPU Cooling Tower Thermal Performance Study for VY Nuclear Power Station, Rev. 0 (February 2003), prepared for ENVY by S&W 16 pages.
30. VY EPU Project, C.J. Nichols to Distribution, re: Project Status Report (November 2003) 4 pages.
31. VY Piping Flow Accelerated Corrosion Inspection Program (PP 7028), 2002 Refueling Outage Inspection Report, RFO 23 (Fall 2002) 14 pages.
32. NRC Preliminary OE Report - Reactor Steam Dryer Found Damaged at Quad Cities Unit 2 (n.d.) 2 pages.
33. VY - Engineering Department Memorandum, Enrico Betti to File UND2002-042 07, re: Condenser Long Term Plan (February 7, 2002) 16 pages. Attached to memo are Addendum A: Summary of Elliot Gage Testing Tube Schedule, 18 pages and Addendum B: Elliot Gage Testing Data, 19 pages.
34. Larry Roit, "Record of the Nineteenth Eddy Current Inspection For the Main Condenser at Vermont Yankee Nuclear Plant," RFO-23 (October 2002), Reviewed by J. Zalewski, 11 pages.
35. D.O. Henry, "Report of In-Vessel Examination Performed for VY Nuclear Power Plant," RFO 18 (March/April 1995), Reviewed by M.J. Anderson, 12 pages.
36. Andrew W. Clay, "Reactor, In Vessel Services Report," Final Report for VY Nuclear Power Station, RFO 23 Outage (October 2002), Reviewed by Terry M. Hofer, Approved by Mark E. Michaels, 9 pages.
37. Entergy, "EPU Cooling Tower Evaporative Loss Study for VY Nuclear Power Station," Prepared by S&W (February 2003) 16 pages.
38. Carl K. Kuester, "VY Nuclear Plant Condenser Evaluation" (November 1999) 31 pages.
39. Quad Cities 2002-004, Report Details, re: Reactor Safety, 3 pages. This report is supposed to be available at <http://www.nrc.gov/reading-rm/doc-collections/event-status/reactor-status/> and <http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/listofrpts/body.html#quad>. However, these websites are no longer available. Therefore, NEC has attached a hard copy from Docket No. 6812, DPS Response to Entergy's Second Set of Information Requests, 3 pages.
40. John W. Hubenthal, "VY Cooling Tower Review," (May 13, 2003) (prepared specially for NEC) 23 pages.
41. U.S. Nuclear Regulatory Commission, Advisory Committee on Reactor Safeguards (December 6, 2000) 47 pages.

42. Viewgraph, "GE Power Uprate Experience," (March 19, 2002), 1 page.
43. Spread Sheet, Prepared from NRC sources including NUREG-1603, Individual Plant Examination Database, 1 page.
44. Memorandum, Barry J. Elliot to William H. Bateman, re: Authorization for Presentation of Technical Paper (April 9, 2003) 14 pages. (Attached paper: V.N. Shah and Y.Y. Liu, Entergy Technology Division, Argonne National Laboratory, B.J. Elliot, Materials & Chemical Engineering Branch, Division of Engineering, NRC, "Effective Approaches For Managing Aging Effects IN BWR Reactor Coolant System Components For License Renewal," (February 2003). Presented at the 2--3 ASME Pressure Vessel and Piping Conference (July 20-24, 2003)).
45. Letter, VY Nuclear Power Corp. to U.S. NRC, re: VY Nuclear Power Station License No. DPR-28 (Docket No. 50-271) Alternative Feedwater Nozzle Inspection (January 22, 2001) 4 pages.
46. BWR Vessel & Internals Project, "Vessel Internals Inspection Summaries for Spring 2001 Outages," (June 10, 2002) 9 pages.
47. U.S. NRC, "Independent Safety Assessment of Maine Yankee Atomic Power Company," (October 1996) 4 pages.
48. Entergy Nuclear Vermont Yankee Business Plan, Rev. 1 (April 2003). 21 pages.
49. "Attachment 7, VY Nuclear Power Station, Proposed Technical Specification Change No. 263, EPU, Justification for Exception to Large Transient Testing," Docket No. 50-271, BVY 03-80 (n.d.) 9 pages.
50. UFSAR, "Alternate Cooling System," Rev. 18-1, 10.8-4 of 10 (n.d.) (Bates Stamped CT00663-CT00670) 8 pages.
51. "Cooling Tower Status Report" (June 16, 2004) (Bates Stamped CT00083-CT00086) 4 pages.
52. E-mail, Walker, Fred to Yasi, Dan and others, re: Cooling Tower Scope Task Status Report 6-9-04 (June 9, 2004). A status report is attached to the Walker email (Bates Stamped CT00116-CT00119) 4 pages.
53. E-mail, Goodwin, Scott to Fitzpatrick, Jim, re: FW: FW: Summary of Request for VY CT upgrade (June 8, 2004). Attached to the Goodwin email is an email from Dan Yasi to James Callaghan and others. Attached to the Yasi email is an email from Norman Engebretsen to Dan Yasi. Attached to the Engebretsen email, S&W, "Cooling Tower Fan Upgrade," Marley / Ecodyne Model 70-1 (June 25, 2004) (Bates Stamped CT00234- CT00238) 5 pages.

54. "VY Feasibility Study For EPU," Sec. 5.8-5.8.4.4.2 (n.d.) (Bates Stamped CT00645-CT00647) 3 pages.
55. "Schedule" [for cooling tower work] (n.d.) (Bates Stamped CT00231-CT00233) 3 pages.
56. Letter, Clifford J. Anderson, U.S. NRC to Jay K. Thayer, ENVY, re: VYNPS - NRC Integrated Inspection Report 05000271/2003005 (July 30, 2003) 32 pages.
57. VY Nuclear Power Station EPU Feasibility Study (June 28, 2002), Prepared by Brian R. Hobbs and Michael E. Jacobs, Docket No. 6812, Appendixes A-E attached, 115 pages.
58. E-mail, Jacobs, Michael to <wmccurdy@mpr.com>, re: Reactor Vessel Loads (March 7, 2003) (Bates Stamped 005617-005618) 2 pages.
59. E-mail, Devinentis, Jim to Thomas, George, re: Final, Qa'd Calc from MPR (March 14, 2003) (Bates Stamped 005606-005608) 3 pages.
60. VY Nuclear Power Station EPU Feasibility Report Matrix (July 2, 2003) (Bates Stamped 005491-005502) 12 pages.
61. E-mail, Garozzo, Joseph to Jacobs, Michael, re: Recirculation Drive Flow Correlation to Core Flow (April 1, 2003) (Bates Stamped 005619) 1 page.
62. E-mail, Perez, Pedro to Oliver, Bob, re: GE Letter Material (February 12, 2003) (Bates Stamped 005452) 1 page.
63. E-mail, Oliver, Bob to <ha.tran@gene.ge.com>, re: FW: GE loads from Task 304 RIPD Analysis (January 20, 2003) (Bates Stamped 005453) 1 page.
64. E-mail, Jacobs, Michael to Felumb, Rhonda, re: FW: Shroud Support (March 13, 2003) (Bates Stamped 005443-005445) 3 pages.
65. E-mail, Garozzo, Joseph to Nichols, Craig, re: Additional EPU Related Calculation (May 20, 2003) (Bates Stamped 005016-005051) 36 pages.
66. Resolutions to Entergy Comments on SW T0406 (n.d.) (Bates Stamped 008464-008466) 3 pages.
67. Table, re: Comments (n.d.) (Bates Stamped 008467-008468) 2 pages.
68. E-mail, Bruster, Laird to Felumb, Rhonda, re: TBCCW IVF / WPS Rev 0 and VY comment resolution sheet - WPS 1.4.3.3 (May 5, 2003) (Bates Stamped 008357-008364) 8 pages.
69. EPU Parameter Changes (August 29, 2002) 23 pages.

70. Summary of Inspections Conducted by NRC at VY from 1988 to date (January 2, 2004) 38 pages.
71. Four Images That Illustrate Cooling Issues (June 29, 2004) 4 pages.
72. E-mail, Jacobs, Michael to Dick, Michael, re: Time Histories of Loads (March 11, 2003) (Bates Stamped 005623) 1 page.
73. "Seismic Analysis For Wooden Frames Surrounding Cooling Tower (VYPS)," Prepared by T.Y. Lin, Kulka, Yang & Associate Structural Engineering (September 5, 1969) (Bates Stamped CT03056-CT03112) 56 pages.
74. Technical Evaluation No. TE 2001-047, Title: Refuel Outage 22, Condenser Steam Space Inspection, Evaluation, and Repair Recommendations, approved by E. Betti (August 6, 2001) 16 pages.
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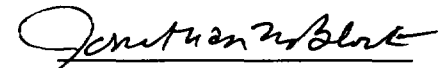
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Respectfully submitted:



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¹ Any party or its representative may schedule an appointment to come to view and copy these documents at the office of NEC's counsel.

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ENTERGY NUCLEAR VERMONT
YANKEE LLC AND ENTERGY NUCLEAR
OPERATIONS, INC.)
(Vermont Yankee Nuclear Power Station)

Docket No. 50-271

ASLBP No. 04-832-02-OLA

January 19, 2005

CERTIFICATE OF DISCLOSURE

I, Raymond G. Shadis, state:

1. My name is Raymond G. Shadis. The New England Coalition has employed me in the position of Staff Technical Advisor since 1998. My duties include assaying and addressing environmental and safety issues at New England's five operating and four decommissioning nuclear reactors. The New England Coalition Board of Trustees has assigned me overall responsibility for interactions with regulators and reactor owners and operators such as Entergy Nuclear Vermont Yankee. In that capacity, I am directing, with assistance of counsel, New England Coalition's participation in the above captioned case.
2. To the best of my knowledge, as of the date of this disclosure, all materials relevant to New England Coalition's accepted contentions in this docket have been disclosed pursuant to 10 C.F.R. §2.336, and the disclosures are as accurate and complete as New England Coalition is able to make at this time.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 19, 2005.



Raymond G. Shadis
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