

RASE-558

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.	50-247-LR
)		50-286-LR
ENTERGY NUCLEAR OPERATIONS, INC.)		
)		
(Indian Point Nuclear Generating Units 2 and 3))		
)	July 29, 2011	

**HUDSON RIVER SLOOP CLEARWATER, INC.'S
MANDATORY DISCLOSURE UPDATE PURSUANT TO C.F.R. § 2.336**

Pursuant to 10 C.F.R. § 2.336, as amended by the Agreement of the Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 ("Mandatory Disclosure Agreement"), Manna Jo Greene hereby declares as follows:

1. I am the Environmental Director for petitioner-intervenor, Hudson Sloop Clearwater, Inc. ("Clearwater").
2. The accompanying Mandatory Disclosure Update supplement's Clearwater's previous disclosures.
3. To the best of my knowledge, information and belief, Clearwater's Mandatory Disclosure Update is accurate and complete, and transmits all materials required to be disclosed pursuant to 10 C.F.R. § 2.336 and the Agreement of Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 that were identified as relevant to the admitted contentions through a reasonable search of the information and documentation under the possession, control, and custody of Clearwater as of July 29, 2011.
4. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2011.

Manna Jo Greene

Manna Jo Greene

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Pursuant to 10 C.F.R. § 2.336, as amended by the Agreement of the Parties Regarding Mandatory Discovery Disclosures dated January 13, 2009 ("Mandatory Disclosure Agreement"), Hudson River Sloop Clearwater ("Clearwater") hereby makes the following mandatory disclosure update to all parties.

DOCUMENTS

In accordance with 10 C.F.R. § 2.336(a)(2), documents, data compilations, and tangible things (e.g., books, publications, and treatises) in the possession, custody or control of Clearwater that are relevant to the Consolidated Contention are identified in the lists below.

Clearwater incorporates by reference, however, pursuant to the Mandatory Disclosure Agreement, does not list documents already served on the parties in this proceeding, relevant news clippings, and drafts of documents. The following lists also exclude documents for which Clearwater claims a privileged status, although, in accordance with the Mandatory Disclosure Agreement, Clearwater will not produce a privilege log for documents asserted to be protected from disclosure under attorney work-product and/or attorney-client privileges.

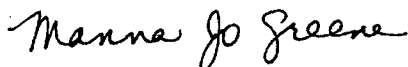
Upon further review of a number of requested documents we had listed on our supplemental disclosure, we have found that many are irrelevant, contain draft information, or are otherwise not subject to disclosure. We have therefore only supplied those documents that are both relevant and subject to disclosure in this proceeding.

A. Non-public Documents:

Description	Document Type	Author	Date	Location
Email re: "Request for data on EJ populations within 50 miles of Indian Point Nuclear plant in Buchanan NY"	Email	From: Manna Jo Greene To: Doug Morisson	04/13/2011	Clearwater Office
Email re: "Potential EJ Areas 10 and 50 miles from Indian Point"	Email and attachment	From: Manna Jo Greene To: Joan Matthews	04/15/2011	Clearwater Office

In addition, Clearwater may rely upon documents identified by other parties to this proceeding. Clearwater may also rely upon all documents cited or referred to in all documents it has previously filed in this proceeding. As disclosure is continuing Clearwater reserves the right to supplement or amend this response.

Respectfully submitted,



Manna Jo Greene
Environmental Director
Hudson River Sloop Clearwater, Inc.
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Beacon, NY 12508
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CERTIFICATE OF SERVICE

Petitioner certifies that on July 29, 2011 copies of the enclosed "HUDSON RIVER SLOOP CLEARWATER, INC.'S MANDATORY DISCLOSURE UPDATE PURSUANT TO C.F.R. § 2.336" were served on the following list by first-class mail and e-mail.

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July 29, 2011