

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

NextEra Energy Seabrook, LLC
(Seabrook Station, Unit 1)

June 7, 2012

Docket No. 50-443-LR

ASLBP No. 10-906-02-LR

AFFIDAVIT OF RAYMOND SHADIS CONCERNING
MANDATORY DISCLOSURE REQUIREMENT OF 10 C.F.R. § 2.336

I, Raymond Shadis, do hereby state as follows:

1. I am pro se representative for Friends of the Coast and New England Coalition (“Friends/NEC”), in the above captioned proceeding.
2. In reviewing documents in my possession and those in possession of intervenors, Friends/NEC, I have not identified any documents upon which Friends/NEC intends to rely at hearing, or which are otherwise relevant to the admitted contention(s) and subject to the disclosure under 10 C.F.R. § 2.336 other than those already provided to the Board and the parties with the *Friends of the Coast and New England Coalition Petition for Leave to Intervene, Request for Hearing, and Admission of Contentions*, Oct. 20, 2010.
3. It is Friends/NEC’s intention to identify access, obtain, and/or gather such documents and provide them in timely fashion according to the disclosure terms and periodicity delineated in 10 C.F.R. §§ 2.336 and as modified by the Atomic Safety and Licensing Board’s *Initial Scheduling Order dated April 4, 2011 (as amended Orders, August 23, 2011 and October 3, 2011)*, and the Board’s *Memorandum and Order (Granting Joint Motion Regarding Mandatory Disclosures, November 10, 2011)*.
4. Friends/NEC has yet to identify and select an expert witness to provide support for its contention(s) in the hearing phase of the above captioned proceeding.

5. I hereby certify that all relevant materials which Friends/NEC is required to disclose as of May 15, 2012 in the captioned proceeding have been disclosed.

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

(signed electronically)

Raymond Shadis

Executed in Edgecomb, Maine this 7th day of June, 2012

Raymond Shadis

Friends of the Coast/New England Coalition

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