

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Docket No. 8300

Petition of Entergy Nuclear Vermont Yankee, LLC)
and Entergy Nuclear Operations, Inc. for a)
certificate of public good, pursuant to 30 V.S.A.)
§ 248 and 10 V.S.A. § 6522, authorizing)
construction of a second independent spent fuel)
storage installation storage pad and related)
improvements, including installation of a new)
diesel generator with an electrical rating of)
approximately 200 kW, at the Vermont Yankee)
Nuclear Power Station in the Town of Vernon,)
Vermont)

July 6, 2015

**SECOND SET OF INFORMATION REQUESTS SERVED UPON
ENTERGY NUCLEAR VERMONT YANKEE, LLC AND ENTERGY NUCLEAR
OPERATIONS, INC. BY THE DEPARTMENT OF PUBLIC SERVICE**

The Department of Public Service (the "Department" or "DPS") by and through Aaron Kisicki, Special Counsel, hereby serves the following Second Set of Information Requests upon Entergy Nuclear Vermont Yankee, LLC and Entergy Nuclear Operations, Inc. (together "Entergy") in this matter in accordance with Public Service Board Rule 2.214 and V.R.C.P. 33 and 34, and requests that Entergy answer the requests in accordance with V.R.C.P. 33 and 34 and deliver its answers and all requested documents and materials to the Department's offices in Montpelier not later than **July 20, 2015**. Entergy is requested to provide two complete copies of all documents. FairPoint is also requested to provide a copy of its answers in electronic format, that is, Word, Excel, or other format readable by the Department, and to provide any spreadsheets in electronic format.

INSTRUCTIONS

1. Reproduce the request being responded to before the response per V.R.C.P. 33.
2. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to Entergy. That is, Entergy should not hold answers to any requests for which they have responsive data, documents, etc. until responses to any or all other requests are compiled.
3. V.R.C.P. 33 requires the response to each request to be made under oath by a person

competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.

4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Entergy's work papers and files or that is otherwise available.
5. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Entergy is directed to change, supplement and correct its answers to conform to all information as it becomes available to Entergy, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.
6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
7. Some of the Department's requests may make particular reference to a portion of an Entergy filing. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Entergy that is responsive to the questions stated.
8. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.
9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. All spreadsheets provided must have all formulae intact and accessible.
10. "Petition," as used herein, means Petitioner's petition filed with the Vermont Public Service Board in this docket, unless the context indicates otherwise.

11. With respect to each document produced by Entergy, identify the person who prepared the document and the date on which the document was prepared.
12. If any interrogatory or request requires a response that Entergy believes to be privileged, please state the complete legal and factual basis for the claim of privilege, provide the information required by the 5/16/95 order in Docket No. 5771 and respond to the parts of the interrogatory or request as to which no privilege is asserted.
13. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject-matter of the document as well as the complete legal and factual basis for the objection.
14. To expedite the discovery process and the resolution of this docket, Entergy should contact the Department as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.
15. The Department reserves the right to submit additional information requests to Entergy.

INTERROGATORIES AND REQUESTS TO PRODUCE

DPS:EN.2-1: Please explain whether Petitioner considers each of the following expenses related to VY to be appropriate for reimbursement from the Nuclear Decommissioning Trust.

- a. Property taxes;
- b. Insurance;
- c. Legal Fees;
- d. Shipments of non-radiological asbestos waste;
- e. Any costs associated with offsite buildings that are not radiologically contaminated;
- f. Replacement of structures during SAFSTOR.

DPS:EN.2-2: Reference A.DPS:EN.1-10 and Attachment A.DPS.EN.1-15.1. Pages 3-4 of Attachment A.DPS.EN.1-15.1 indicate that haul path upgrades will be made as part of the Project. Please explain whether a "turning pad", similar to the one reflected in Exhibit EN-JG-7 near the east ramp, will be installed near the new west ramp.

DPS:EN.2-3: Reference A.DPS:EN.1-10. Please explain whether new location or realignment of the main vehicle entrance and egress to and from the current VY Protected Area.

DPS:EN.2-4: Reference A.DPS:EN.1-17. A.DPS:EN.1-17 notes the use of high density concrete to fill an overpack.

- a. Please explain whether the high density concrete will be prepared and/or mixed off-site and transported directly to the Project site for pouring, or will it be prepared on-site.
- b. If the high density concrete is prepared and/or mixed onsite, please identify and describe where the preparation activities will take place.

DPS:EN.2-5: Reference A.DPS:EN.1-23. Please describe any and all aesthetic mitigation measures related to the Project that were considered by Petitioner, and explain the basis for rejecting each of the mitigation measures considered.

Dated at Montpelier, Vermont this Sixth day of July, 2015.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By:



Aaron Kisicki
Special Counsel

cc: Docket No. 8300 Service List