

STATE OF VERMONT
PUBLIC SERVICE BOARD

Petition of Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc., for a Certificate of Public Good authorizing the 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
Docket No. 8300

**SECOND SET OF INFORMATION
REQUESTS SERVED UPON ENTERGY
NUCLEAR VERMONT YANKEE, LLC AND
ENTERGY NUCLEAR OPERATIONS, INC.
BY NEW ENGLAND COALITION, INC.**

New England Coalition, Inc. (NEC) by Clay Turnbull, *Pro Se* Representative, hereby serves the following Second Set of Information Requests upon Entergy Nuclear Vermont Yankee, LLC, and Entergy Nuclear Operations, Inc. (taken together Entergy) in the above captioned docket in accordance with Public Service Board Rule 2.214 and V.R.C.P.33 and 34, and requests Entergy answer the requests in accordance with V.R.C.P. 33 and 34 and cause to be delivered its answers and all requested documents and materials to the New England Coalition, Inc. (NEC) offices in Brattleboro, Vermont as soon as practicable and per the Vermont Public Service Board's Order of May 6, 2015, in no case later than July 20, 2015. Entergy is requested to provide two complete copies of all answers; with two additional copies in standard electronic format, that is, WordPerfect, Microsoft Word or electronically searchable, extractable pdf format. Where Entergy has the requested information in original electronic format, Entergy is requested to provide it in original format.

INSTRUCTIONS

1. Reproduce the request being responded to before the response per V.R.C.P. 33.
2. Responses to any and all NEC requests contained herein or which may be filed later should be supplied to NEC as soon as they become available to Entergy. That is, Entergy should not hold answers to any requests for which it does 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 work papers and files or which 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 NEC's requests may make particular reference to a portion of Entergy's filing. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Entergy which 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. Documents shall include all documents that have been posted on Citrix and/or any other limited access electronic bulletin board, archive, or website for the purpose of informing the U.S. Nuclear Regulatory Commission, any other regulator, Entergy or any of its corporate branches or sub-divisions, consultants, or trade organizations (E.G, INPO, BWROG, NEI, etc.)

10. "Petition", as used herein, means Entergy'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 Entergy believes to be privileged, please state the complete legal and factual basis for the claim of privilege, and provide the information

required by the May 6, 2015 scheduling order in Docket No. 8300 and respond to the parts of the interrogatory or request as to which 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 to which it is not objected. 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 NEC as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.

15. If Entergy believes any of the information requested has already been provided to New England Coalition please identify the information Entergy believes to be responsive by title, location, author, date, and document and/or index number.


16. NEC reserves the right to submit additional information requests to Entergy.

INTERROGATORIES AND REQUESTS TO PRODUCE

1. Re: Q.NEC:EN.1-7: Why are the calculations proprietary?
2. Re: Q.NEC:EN.1-9: In light of the United States Nuclear Regulatory Commission's recent approval of withdrawal(s) of up to \$225 million, more or less, from the decommissioning trust fund, please update your answer to this question.
3. Re: Q.NEC:EN.1-12: Why have you not evaluated the Waste Specialists, LLC's in Andrews, Texas or the Holtec applications in Hobbs, New Mexico for interim consolidated storage? And if you have, please disclose the status of such evaluation(s).
4. Re: Q.NEC:EN.1-14: Same question as asked with the addition of the time period in question of February 6, 2013, to June 17, 2015 in lieu of "without limitation".
5. Re: Q.NEC:EN.1-17: Describe the procedure by which you review, evaluate and rank contingencies in the event the DOE does not remove the fuel.
6. Re: Q.NEC:EN.1-20 Does Entergy have an ownership or other interest in any company seeking permits to store low level waste, mid-level waste and or high level waste?
7. Re: Q.NEC:EN.1-20: Please describe entity as used in this answer. Are you able to move your spent fuel without transferring it to another "entity" as used in this answer? If so why have not you evaluated this option?


8. Re: Q.NEC:EN.1-21: Please describe the alternative assumptions which should and or could be made now with respect to this question considering the United States Department of Energy's (DOE) continued inability to develop a consolidated interim storage or even permanent national storage? Also consider the NRC rule of on site storage for up to hundreds of years.
9. Re: Q.NEC:EN.1-23: Why would not the company consider other options for screening such as building the screen/facade to look like a building (perhaps a red barn with white trim).
10. Re: Q.NEC:EN.1-24: We see no evidence of your having had investigated other sites for storage although the NRC license appears to allow such siting. State your rationale for not investigating another site for an ISFSI capable of holding all 60 casks on or off the VY site.

Dated this 6th day of July, 2015 at Brattleboro, Vermont 05301.

By 
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Pro Se Representative
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CERTIFICATION OF SERVICE

I certify that the above NEC's Second Set of Information Requests was served on Energy and parties to the proceeding on July 6, 2015, by U.S.P.S. first-class postage pre-paid today.


Clay Turnbull