

## Discovery Questions

Q.ANR:EN.2-1: Please identify and describe all non-radiological waste activities that have taken place at the North Warehouse since the building was constructed.

- a. For each non-radiological waste activity identified, please identify all persons that have information about the activity.
- b. Please produce any and all documents that relate to non-radiological waste activities at the North Warehouse.

A.ANR:EN.2-1: OBJECTION. Entergy VY objects to this request as vague, not reasonably limited in scope or time, and not reasonably calculated to lead to the discovery of admissible evidence. Entergy VY further objects to the request for "any and all documents that relate to non-radiological waste activities at the North Warehouse" as overbroad and unduly burdensome. In addition, Entergy VY objects to the extent the request calls for the production of information or documents not in the possession, custody or control of Entergy VY or their expert witnesses. Entergy VY also objects to the extent this request calls for the production of information that is publicly available and could be obtained by ANR in a less burdensome manner.

Without waiving its objections, Entergy VY states that the North Warehouse was constructed over 40 years ago by the VY Station's former owner. Entergy VY understands that the VY Station's former owner used the North Warehouse as a short term storage area for hazardous waste and universal waste. Entergy VY also used the North Warehouse for this purpose until approximately ~~2006~~[November 2015](#). The waste was stored and then shipped for disposal via a qualified waste disposal vendor. The types of non-radiological waste that may have been temporarily stored in this location would have included:

- Universal Waste batteries
- Universal Waste bulbs
- PCB ballasts
- Non-PCB ballasts
- Mercury containing devices
- Used oil
- D002 Hazardous Waste
- D001 Oily rags and absorbents
- D001 Paint related waste
- D001 Flammable Aerosols
- Ethylene glycol
- Computer parts

- a. As explained above, the North Warehouse was constructed by the former owner over 40 years ago. Consequently, Entergy VY is unable to identify "all persons" having any information about any non-radiological waste activities that may have occurred at the North Warehouse during this time period. Mr. Jeffrey Wagner, Senior Project Manager, oversaw the preparation of the October 2014 Vermont Yankee Site Assessment Study and currently has primary responsibility for overseeing non-radiological waste activities at the Vermont Yankee Station. In addition, in 2014, Entergy VY retained Radiation Safety & Control Services to prepare a Non-Radiological Historical Site Assessment, and in 2001, the former owner retained Environmental Compliance Services, Inc. to prepare an Environmental Site Assessment. In addition, as indicated in Attachment A.ANR:EN.2-1 (2001 Phase I and II Environmental Site Assessment), Clean Harbors, Inc., Advanced Recovery, Inc. and Tri-State Automotive have previously provided various disposal services for non-radiological waste stored at the North Warehouse.
- b. Entergy VY is producing non-radiological site assessments sufficient to show the general types of non-radiological waste activities that are known to have occurred at the North Warehouse. The 2014 Non-Radiological Historical Site Assessment prepared by Radiation Safety & Control Services is publicly available at <http://vydecommissioning.com/wp-content/uploads/2014/10/SAS-Appendix-F-VY-Non-Radiological-Historical-Site-Assessment.pdf>. See Attachment A.ANR:EN.2-1 (2001 Phase I and II Environmental Site Assessment).

Person Responsible for Response: George Thomas  
Title: Senior Project Manager  
Date: July 20, 2015 (Corrected December 16, 2015)

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