

Q.DPS:EN.1-15: Please provide an anticipated construction schedule for the Project and associated spent fuel transfer, detailing all activities from anticipated receipt of a certificate of public good through the conclusion of the last fuel transfer campaign.

A.DPS:EN.1-15: **OBJECTION.** By this reference, Entergy VY incorporates General Objection 6. Specifically, this request seeks information related to spent nuclear fuel management, which is within the NRC's primary or exclusive jurisdiction. Entergy VY further objects to this request as vague, overly broad, and unduly burdensome, in that it requests Entergy VY to detail "all activities from anticipated receipt of a certificate of public good through the conclusion of the last fuel transfer campaign." Entergy VY further objects that this request is unduly burdensome and beyond the requirements of the discovery rules to the extent that the request requires preparation of an analysis that does not exist, and to the extent it requires Entergy VY to create, modify, or manipulate any documents, records, data or other information to furnish a response to the instant request.

Without waiving its objections, Entergy VY will provide current working versions of the anticipated construction schedule for the Project and anticipated schedule for spent fuel transfer, showing major milestones for each activity. See Attachment A.DPS:EN.1-15.1 (ISFSI Full Schedule – ISFSI Pad) and Attachment A.DPS:EN.1-15.2 (ISFSI Full Schedule – DFS Casks). The anticipated schedules assume that Entergy VY obtains the Certificate of Public Good in sufficient time to allow any potential delays in its implementation to be addressed.

Person Responsible for Response: George Thomas
Title: Senior Project Manager
Date: June 17, 2015

FIRST SUPPLEMENTAL RESPONSE

OBJECTION. By this reference, Entergy VY incorporates its objections set forth in A.DPS:EN.1-15.

Without waiving any objection, Entergy VY provides the updated schedules set forth in Attachment A.DPS:EN.1-15.3 (ISFSI Full Schedule-ISFSI Pad) and Attachment A.DPS:EN.1-15.4 (ISFSI Full Schedule-DFS Casks).

Person Responsible for Response: George Thomas
Title: Senior Project Manager
Date: December 16, 2015