

Q.NEC:EN.1-10: Please provide all relevant meeting minutes, reports, work orders, quality control documents, inspection reports, checklists, correspondence, notes and memoranda of Entergy employees, managers, executives, working groups, departments, committees, task forces, and the like which are or have been responsible for scheduling, engineering, designing, interpreting, making determinations, casting decisions, and analyzing activities related to the proposed spent fuel storage project.

a. Please be sure to include within the considered “working groups, department committees, task forces and the like”, all those entities which prepared or helped to prepare Entergy’s petition for a certificate of public good (CPG) for the proposed spent fuel storage project.

b. Please be sure to include within the considered “working groups, department, committees, task forces and the like”, boards of directors, oversight committees, and any other such entities responsible for informing, advising, or governing the activities of Entergy with respect to the proposed spent fuel project (Project).

c. Please be sure to include within the considered “working groups, department, committees, task forces and the like”, all entities responsible for Entergy public and governmental outreach, information, lobbying and public relations.

A.NEC:EN.1-10: **OBJECTION.** By this reference, Entergy VY incorporates General Objection 7. Specifically, this request seeks production of documents related to spent nuclear fuel management, which is within the NRC’s primary or exclusive jurisdiction. Entergy VY objects to this request as overly broad, unduly burdensome, and vague. Entergy further objects to this request on the grounds that it is not reasonably limited in scope. The request calls for the production of an enormous amount of information that is of limited importance to the issues in this docket at substantial expense to Entergy VY. In addition, Entergy VY objects to this request to the extent it seeks information that is protected by the attorney-client privilege or attorney work product doctrine.

Without waiving objections, Entergy VY will provide Project team meeting minutes, agendas, and action item lists. Entergy VY will also provide internal correspondence among Project team members and external correspondence between Project team members and the principal third-party vendors supporting the Project regarding significant Project activities and developments. See Attachment A.NEC:EN.1-10.

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.NEC:EN.1-10.

Without waiving any objection, Entergy VY provides the supplemental documents set forth in Attachment A.NEC:EN.1-10 (First Supplemental).

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

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