

Requests to George Thomas

Discovery Questions

Q.NEC:EN.GT.3-1: Regarding Thomas' pre-filed rebuttal answer 17 at page 11, line 4:

- A. Please provide any analyses, data, conclusions, criteria, reports, memos, maps, drawings, diagrams, illustrations, studies, rubric or any other document used or made in identifying, excluding, or selecting potential locations on and off site including cost comparisons and results of surveys or other documents indicating public and other stakeholder opinion with respect to siting.
- B. Provide the identity (name, title, organization) of all employees, contractors and subcontractors of those involved in the decision making process of the location selection and exclusions of potential locations on and off site. Include a timeline of the decision making process.
- C. At Line 7: Was the right of way issue as discussed the only reason the north and east side was not selected? Provide all evidence of an attempt to mitigate the preclusion of this location in addition to the documents requested in question 1(A) above.
- D. At Line 9: Were the aesthetics and radiation issues as discussed the only reasons the west side was not selected? Provide all evidence of an attempt to mitigate the preclusion of this location in addition to the documents requested in question 1(A) above.
- E. At Line 13: Why is the release of radiation an issue in siting the pad on the west side? Provide the studies or data showing where the release would cease to be a concern.
- F. At Line 19: Were the West Cooling Tower Deep Basin, Vertical Cask Transporter path, aesthetics and radiation issues as discussed the only reasons the south side was not selected? Provide all evidence of an attempt to mitigate the preclusion of this location in addition to the documents requested in question 1(A) above. Also provide documents showing which properties would be affected by the lighting and provide objective lighting criteria used in evaluating ISFSI siting at Vermont Yankee.
- G. At Line 4, Page 12: Why is the release of radiation an issue in siting the pad on the south side? Provide the studies or data showing where the release would cease to be a concern due to proximity to neighboring properties.
- H. Would the presence or absence of plant structures affect the aesthetic impacts of the proposed ISFSI after decommissioning the VY nuclear power station? If you are working with the assumption that the ISFSI will be emptied of spent fuel prior to

plant license termination, please provide all supporting documents for that assumption.

A.NEC:EN.GT.3-1: OBJECTION. By this reference, Entergy VY incorporates General Objection 6. 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 and seeks information that is outside the scope of NEC's permitted intervention in this proceeding, as set forth in the Board's July 7, 2015 Order Re: Motions to Intervene. Entergy VY further 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 any objection, Entergy VY responds:

A. See A.NEC:EN.1-10 and the Attachments provided therewith. Entergy VY reviewed and discussed internally the potential site location options but did not prepare any formal analyses, reports or other documentation regarding alternative locations.

See Attachment A.NEC:EN.GT.3-1.A.

B. On Tuesday 9/10/2013, a meeting and site tour were conducted to review the potential locations for the 2nd ISFSI storage pad.

Attendees were the following Entergy VY employees:

Robert Smith, Vice President Decommissioning
Kenneth Swanger, Dry Fuel Storage Project Manager
Scott Dorval, Radiation Protection Supervisor
Brian Copperthite, Security Supervisor
George Thomas, Senior Project Manager

Following the meeting and site tour, the decision was made to locate the second ISFSI storage pad to the west of the existing storage pad in the Vermont Yankee Nuclear Power Station's ("VY Station") Protected Area, as currently proposed.

C. No. There are a number of reasons that contributed to that decision. Please refer to the initial prefiled testimony of George Thomas dated June 30, 2014, describing other reasons for not locating the second ISFSI pad elsewhere on the VY Station site. It is not possible to locate an ISFSI within a high-voltage transmission line right-of-way due to National Electric Safety Code (NESC) requirements for an appropriate clearance between energized high-voltage lines and structures or other objects and because doing so would present an unacceptable hazard to the ISFSI. Excluding locations beneath the existing 345 kV and 115 kV lines, there is insufficient

land to construct an ISFSI pad in this location. There are no reasonable mitigation measures for this location available within Entergy VY's control.

D. No. There are a number of reasons that contributed to that decision. Please refer to the initial prefiled testimony of George Thomas dated June 30, 2014, describing other reasons for not locating the second ISFSI elsewhere on the VY Station site. There are no reasonable mitigation measures for this location available within Entergy VY's control.

E. OBJECTION. Entergy VY further objects that the request seeks the production of confidential and propriety information of Entergy VY's vendor, Holtec International. Upon the entry of an appropriate Protective Order in this proceeding and subject to and in accordance with the terms of the June 18, 2015 Protective Agreement, Entergy VY will make the report of Holtec International's radiological dose engineering calculations and related document(s) available for inspection, subject to the restrictions and procedures required by Holtec International.

Without waiving any objection, Entergy VY responds:

At the time that the location of the second ISFSI pad was selected, there were concerns that locating an ISFSI along the west edge of the VY site would result in elevated radiation levels (as compared to the chosen location) at the residential properties located along Governor Hunt Road. Subsequent to site selection, Holtec International provided a report of the radiation dose rates as a function of distance from the chosen location of the ISFSI pad that confirmed that locating an ISFSI west of the Vernon Substation would result in unacceptable radiation dose rates at those properties.

F. No. There are a number of reasons that contributed to that decision. Please refer to the initial prefiled testimony of George Thomas dated June 30, 2014, describing other reasons for not locating the second ISFSI elsewhere on the VY Station site. There are no reasonable mitigation measures for this location available within Entergy VY's control.

G. OBJECTION. Entergy VY further objects that the request seeks the production of confidential and propriety information of Entergy VY's vendor, Holtec International. Upon the entry of an appropriate Protective Order in this proceeding and subject to and in accordance with the terms of the June 18, 2015 Protective Agreement, Entergy VY will make the report of Holtec International's radiological dose engineering calculations and related document(s) available for inspection, subject to the restrictions and procedures required by Holtec International.

Without waiving any objection, Entergy VY responds:

At the time that the location of the second ISFSI pad was selected, there were concerns that locating an ISFSI south of the cooling towers would result in elevated radiation levels (as compared to the chosen location) at the residential properties located along Governor Hunt Road. Subsequent to site selection, Holtec International provided a report of the radiation dose rates as a function of distance from the chosen location of the ISFSI pad that confirmed that

locating an ISFSI on the south side of the VY site would result in unacceptable radiation dose rates at those properties.

H. OBJECTION. Entergy VY further objects that the requests seeks 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.

Without waiving any objection, Entergy VY responds:

Regarding the first portion of the question, please refer to the prefiled testimony of Harry Dodson dated June 30, 2014, in which he explains that he analyzed the aesthetic impacts of the proposed ISFSI under three scenarios: first, with the VY Station in place as it currently exists; second, a simulation of the project without the buildings and structures that will likely be removed during decommissioning; and third, a simulation of the project without buildings and structures that will likely be removed during decommissioning, except certain facilities that could remain for potential reuse of the site. Please also refer to the supplemental prefiled testimony of Harry Dodson dated May 11, 2015, in which he updates the simulations and analysis for each scenario. Mr. Dodson concludes that under each scenario, the project will not have an adverse impact on the aesthetics of the area.

Regarding the second sentence of the question, the aesthetic analysis does not include any assumptions regarding the date that spent fuel will be removed from the site. Additionally, please see the responses and objections stated in A.NEC:EN.1-4, A.NEC:EN.1-13, A.NEC:EN.1-14, A.NEC:EN.1-21 and Attachments provided therewith and referenced therein.

Person Responsible for Response: George Thomas; Harry L. Dodson; T. Michael Twomey
Title: Senior Project Manager; Principal, Dodson & Flinker Inc.; Vice President, External Affairs, EWC; Vice President, ENOI
Date: November 24, 2015 (Corrected December 16, 2017)

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