

STATE OF VERMONT

PUBLIC UTILITY COMMISSION

Joint Petition of NorthStar Decommissioning Holdings, LLC, NorthStar Nuclear Decommissioning Company, LLC, NorthStar Group Services, Inc., LVI Parent Corp., NorthStar Group Holdings, LLC, Entergy Nuclear Vermont Investment Company, LLC, and Entergy Nuclear Operations, Inc., and any other necessary affiliated entities to transfer ownership of Entergy Nuclear Vermont Yankee, LLC, and for certain ancillary approvals, pursuant to 30 V.S.A. §§ 107, 231, and 232)

Docket No. 8880

JOINT PETITIONERS' FIRST DISCOVERY REQUESTS TO THE VERMONT PUBLIC SERVICE DEPARTMENT

NorthStar Decommissioning Holdings, LLC, NorthStar Nuclear Decommissioning Company, LLC, NorthStar Group Services, Inc., LVI Parent Corp., NorthStar Group Holdings, LLC, Entergy Nuclear Vermont Investment Company, LLC, and Entergy Nuclear Operations, Inc., and any other necessary affiliated entities to transfer ownership of Entergy Nuclear Vermont Yankee, LLC (referenced collectively as "Joint Petitioners") serve the following discovery requests.

Joint Petitioners respectfully request that the Vermont Public Service Department ("DPS") answer the following discovery requests in writing and under oath and deliver one complete copy of all documents, plus an electronic version of such response.

DEFINITIONS

The following definitions apply to the following discovery requests:

- 1. Communication. The term "communication" means the transmittal of information in the form of facts, ideas, inquiries or otherwise.
2. Document. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in Vermont Rule of Civil Procedure 34(a) and includes any and all writings, drafts, or other materials, whether handwritten, typed, printed, recorded or reproduced by any other physical, mechanical, electronic or electrical means, including, but not limited to, records, papers, correspondence, telegrams, memoranda, notes, letters, photographs,

photographic slides or negatives, films, filmstrips, computer diskettes, computer files, tapes and recordings, summaries or records of telephone conversations, summaries or records of personal conversations, and all carbons or photocopies bearing any underlining, highlighting, additions, corrections, or marginal notations which are in the possession, custody, or control of the DPS, its agents, employees, representatives, attorneys or experts, wherever located.

3. Identify (With Respect to Persons). When referring to a person, to “identify” means to provide, to the extent known, the person’s full name, title, present or last known address, and the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of the person need be listed in response to subsequent discovery requesting the identification of that person. When referring to corporate entities, to “identify” means to provide, to the extent known, the entity’s full name, tradename, and address of its principal place of business. Once a corporate entity has been identified in accordance with this subparagraph, only the name of the corporation need be listed in response to subsequent discovery requesting the identification of that entity.

4. Identify (With Respect to Documents). When referring to documents, to “identify” means to provide, to the extent known, information about (i) the type of document; (ii) its general subject matter; (iii) the date of the document; and (iv) its author(s), and each recipient.

5. You or Your(s): You or your(s) means the DPS, its employees, consultants, representatives, and designated fact and/or expert witnesses.

6. Person. The term “person” is defined as any natural person or any business, legal or governmental entity or association.

7. Concerning. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

8. Produce. The term “produce” means to provide the original or an exact legible copy of a requested document that is within your custody, possession or control to Joint Petitioners’ counsel. All electronically stored data must be provided in a form or forms in which it was originally created. A draft or non-identical copy is a separate document within the meaning of this term

9. VY Station. This term refers to the Vermont Yankee Nuclear Power Station.

10. NorthStar. This term refers to NorthStar Decommissioning Holdings, LLC, NorthStar Group Holdings, LLC, LVI Parent Corp., NorthStar Group Services, Inc., and NorthStar Nuclear Decommissioning Company, LLC, collectively.

11. NRC. This term refers to the Nuclear Regulatory Commission.

12. ENVY. This term refers to Entergy Nuclear Vermont Yankee, LLC.

The following rules of construction apply to all discovery requests:

1. All/Each. The terms “all” and “each” shall both be construed as all and each.
2. And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
3. Number. The use of the singular form of any word includes the plural and vice versa.

INSTRUCTIONS

1. Provide a separate page for each separate question. Reproduce the discovery request made before presenting the response.
2. The response to each request should 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, state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the date on which each question was answered; and (3) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared.
3. 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), provide all information with respect to the subject matter of the question that can be identified in your work papers and files or that is otherwise available and identify all such limitations.
4. These discovery requests are continuing in nature, and require you to file supplementary answers pursuant to the Vermont Rules of Civil Procedure as incorporated by the Rules of the Vermont Public Utility Commission. Change, supplement and correct your responses to conform to all information as it becomes available to you, including the substitution of actual data for estimated data. Responses to requests 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.
5. Whenever responses include estimated information, please identify such estimates and include an explanation (or reference to a previous explanation) of the methods, calculations, and assumptions used to derive the estimates.

6. The use of the present tense shall be construed to include the past tense, and vice versa, so as to make each request inclusive rather than exclusive.

7. For any matter where a request for admission is being answered by a denial or objection, the answer should set forth in detail the reasons for the denial or objection, in conformity with Vermont Rule of Civil Procedure 36.

8. In construing these discovery requests, the terms “refer to” and “relate to” shall include any and all logical or factual connections to the subject of the discovery request as specified.

9. If any interrogatory or request requires a response that DPS believes to be privileged, whether in whole or in part, state the complete legal and factual basis for the claim of privilege, and respond to all parts of the interrogatory or request as to which no privilege is asserted. If a claim of privilege is asserted as to any documents, identify the document by author, title, date and recipient(s), and describe the nature and subject-matter of the document as well as the complete legal and factual basis for the claim of privilege.

10. If any interrogatory or request is objected to in whole or in part, describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request as to which no objection is asserted. If an objection is interposed as to any requested documents, identify the document by author, title, date, and recipient(s), and describe the nature and subject matter of the document, as well as the complete legal and factual basis for the objection.

11. Organize responses and supporting documents using the identifying number to which they respond.

REQUESTS

Requests for Brian Winn

Q.JP:DPS.1-1: Identify, list, and produce all exhibits to be introduced or used at hearing in support of the prefiled testimony of Brian Winn in this proceeding.

Q.JP:DPS.1-2: Identify, list, and produce all documents, data compilations, electronically stored information, photographs, workpapers, or other tangible things provided to, exchanged with, prepared by, reviewed by, relied upon or used by Mr. Winn in developing his prefiled testimony and the opinion(s) underlying his prefiled testimony, including, but not limited to, all exhibits to his prefiled testimony, to the extent not already produced.

Q.JP:DPS.1-3: Identify all assumptions, materials, inputs, data or information provided to Mr. Winn in connection with his preparation of prefiled testimony.

Q.JP:DPS.1-4: Identify and describe all previous work (include cost estimation and funding analysis) Mr. Winn has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration and produce all documents relating to all previous work Mr. Winn has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

- a. Identify all regulatory proceedings by jurisdiction, date, docket number, and name in which Mr. Winn has testified or provided consulting or expert support for witnesses testifying on nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

Q.JP:DPS.1-5: Identify and describe all previous work Mr. Winn has undertaken relating to any of the Joint Petitioner parties, or related entities.

Q.JP:DPS.1-6: Identify each communication the Department has had with any party to this proceeding concerning Joint Petitioners' petition for a Certificate of Public Good, including (1) the method of communication, (2) the date of the communication, (3) the parties to the communication, (4) any other parties who witnessed or heard the communication and (5) identify and produce all documents concerning such communications.

Q.JP:DPS.1-7: Identify each communication the Department has had with any non-party (including, without limitation, any federal or state agency, organization or entity), concerning Joint Petitioners' petition for a Certificate of Public Good, including (1) the method of communication, (2) the date of the communication, (3) the parties to the communication, (4) any other parties who witnessed or heard the communication and (5) identify and produce all documents concerning such communications.

Q.JP:DPS.1-8: Mr. Winn states that he was employed by Southern California Edison until January 2015. Exhibit DPS-BEW-1. Describe Mr. Winn's knowledge of or involvement with the expense and duration of the decommissioning oversight contractor selection process at San Onofre Nuclear Generating Station ("SONGS") or any other aspect of the SONGS decommissioning project.

- a. Explain whether and how the SONGS experience was used as the basis for assumptions specific to Mr. Winn's testimony in this Docket.

Q.JP:DPS.1-9: As to Mr. Winn's testimony that "[t]he Joint Petitioners have acknowledged that such consideration [of the Section 248 criteria] is appropriate," Winn PFT at 6:11-13, admit that:

- a. The Joint Petition does not seek approval under Section 248.
- b. Joint Petitioners have explicitly advanced the position that Section 248 criteria need not be strictly satisfied in this proceeding, *see, e.g.*, A.DPS:JP.1-2.
- c. As to a and b, if denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.

Q.JP:DPS.1-10: Mr. Winn's testimony states that "NorthStar ... has never taken the lead on a *nuclear* decommissioning project." Winn PFT at 7:2-3 (emphasis in original).

- a. Admit that this statement is untrue given NorthStar's work, *inter alia*, on the University of Illinois—Nuclear Reactor Lab, DOE Hanford, University at Buffalo, University of Arizona—Nuclear Reactor Lab, and University Of Washington—Nuclear Reactor projects. *See* State PFT at 7-8. If denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.
- b. Explain why Mr. Winn did not consider those projects.
- c. Explain why Mr. Winn did not consider the experience of AREVA, WCS, and Burns & McDonnell on prior nuclear projects.

Q.JP:DPS.1-11: Admit that the "risks" claimed by Mr. Winn at Winn PFT at 7:16-8:4 are equally faced under the proposed transaction and under the status quo. If denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.

Q.JP:DPS.1-12: Define "industry practice" as used at Winn PFT at 8:14.

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- a. Identify all nuclear sites that exemplify this “industry practice.” Produce all documents relied upon in your response.

Q.JP:DPS.1-13: Define “subsurface equipment” as used at Winn PFT at 8:15.

Q.JP:DPS.1-14: Define the “standard approach.” Winn PFT at 11:25.

- a. Identify all nuclear sites that exemplify this “standard approach.” Produce all documents relied upon in your response.

Requests for Daniel Dane

Q.JP:DPS.1-15: Identify, list and produce all exhibits to be introduced or used at hearing in support of the prefiled testimony of Daniel S. Dane in this proceeding.

Q.JP:DPS.1-16: Identify, list and produce all documents, data compilations, electronically stored information, photographs, workpapers or other tangible things provided to, exchanged with, prepared by, reviewed by, relied upon or used by Mr. Dane in developing his prefiled testimony and the opinion(s) underlying his prefiled testimony, including, but not limited to, all exhibits to his prefiled testimony, to the extent not already produced.

Q.JP:DPS.1-17: Identify all assumptions, materials, inputs, data or information provided to Mr. Dane in connection with his preparation of prefiled testimony.

Q.JP:DPS.1-18: Identify and describe all previous work (including cost estimation and funding analysis) Mr. Dane has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration, and produce all documents relating to all previous work Mr. Dane has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

- a. Identify all regulatory proceedings by jurisdiction, date, docket number and name in which Mr. Dane has testified or provided consulting or expert support for witnesses testifying on nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

Q.JP:DPS.1-19: Identify and describe all previous work Mr. Dane has undertaken relating to any of the Joint Petitioner parties, or related entities.

Q.JP:DPS.1-20: Identify all of the projects listed at Dane PFT at 4:9-12 that involved the sale or transfer of a nuclear power plant or owner of a nuclear power plant.

- a. As to each such project, state whether the seller retained liability for radiological decommissioning, spent nuclear fuel management, and/or site restoration.
- b. As to each such project, state whether the transaction was subject to state regulatory approval and, if so, describe the nature of the approval process and whether approval was received.
- c. As to each such project, state whether Mr. Dane applied the same criteria (including without limitation the financial ratios discussed at Dane PFT at 19:9-22:15) his prefiled testimony applies to the instant transaction, and indicate how the project fared on each of the criteria.

- d. Provide all reports and documents produced by Mr. Dane or under his supervision relating to such projects.

Q.JP:DPS.1-21: Identify each case in which Mr. Dane has assisted clients in recovering spent nuclear fuel costs from DOE (whether through litigation or under a settlement agreement) pursuant to claims arising under the Standard Contract for Disposal of Spent Nuclear Fuel and/or High-Level Radioactive Waste.

- a. Describe in each case what percentage of the licensee's actual spent nuclear fuel costs were successfully recovered from DOE.
- b. Describe in each case the lag time between the client's expenditure of funds for spent nuclear fuel storage costs and the client's recovery of those costs from DOE.
- c. Describe in each case whether the claim involved costs for ISFSI operations and maintenance only.
- d. Provide all testimony and exhibits produced by Mr. Dane in such cases.
- e. Describe Mr. Dane's understanding of the percentage recovery rate for claims involving the VY Station.

Q.JP:DPS.1-22: Regarding Dane PFT at 11:12-15 ("Specifically, there are significant risks to NorthStar's decommissioning estimate that have been identified in the Four Points Group Report."), state whether Mr. Dane exercised any independent judgment as to the correctness of the Four Points Group Report. If so, identify the matters he considered independently to evaluate the Four Points Group Report.

Q.JP:DPS.1-23: State what Mr. Dane considers to be an acceptable turnover ratio for companies in NorthStar's industry, *i.e.*, the industry of demolition and abatement of nuclear and non-nuclear structures and sites. Explain the basis for the answer. Produce any documents relied upon.

Q.JP:DPS.1-24: State what Mr. Dane considers to be an acceptable FFO/Debt ratio for companies in NorthStar's industry. Explain the basis for the answer. Produce any documents relied upon.

Q.JP:DPS.1-25: State the basis, including any past examples, for Mr. Dane's use of "standard" volatility (*see* Dane PFT at 20 n.36) for a company that owns a nuclear power plant that is being decommissioned. Produce any documents relied upon.

Q.JP:DPS.1-26: State the basis, including any past examples, for Mr. Dane's use of "standard" volatility (*see* Dane PFT at 20 n.36) for a company that operates in NorthStar's industry. Produce any documents relied upon.

Q.JP:DPS.1-27: State what Mr. Dane considers to be an acceptable Debt/EBITDA ratio for companies in NorthStar's industry. Explain the basis for the answer. Produce any documents relied upon.

Q.JP:DPS.1-28: State what Mr. Dane considers to be an acceptable EBITDA/Interest ratio for companies in NorthStar's industry. Explain the basis for the answer. Produce any documents relied upon.

Q.JP:DPS.1-29: State what Mr. Dane considers to be an acceptable Altman Z score for companies in NorthStar's industry. Explain the basis for the answer. Produce any documents relied upon.

Q.JP:DPS.1-30: Explain Mr. Dane's basis for discounting NorthStar's sales forecasts for the remaining months of 2017. Produce any documents relied upon.

Q.JP:DPS.1-31: Mr. Dane states that NorthStar "continues to have a high level of debt relative to its earnings." Dane PFT at 23:16.

- a. State whether this assertion concerns the post-recapitalization NorthStar.
- b. In using the descriptor "high," what benchmark is Mr. Dane using? Produce any documents relied upon.

Q.JP:DPS.1-32: As to each of the projects listed at Dane PFT at 4:9-12, state the percentage of "overhead allocations" (Dane PFT at 30:15) relative to the costs of the project.

Q.JP:DPS.1-33: As to each of the projects listed at Dane PFT at 4:9-12, state the real rate of return that was assumed in the decommissioning funding or cash flow analysis.

Q.JP:DPS.1-34: Admit that Dane PFT at 36:22 should state "decommissioning and site restoration," rather than "decommissioning." If denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.

Q.JP:DPS.1-35: State whether the "assumptions" that "appear unreasonable" (Dane PFT at 37:15-16) so appear to Mr. Dane, to Four Points Group, or to both.

Q.JP:DPS.1-36: State the basis for Mr. Dane's statement that "it is unclear whether NorthStar could obtain a bond with a face amount sufficient to cover its entire scope" (Dane PFT at 39:1-2), where "its entire scope" was previously defined by Mr. Dane to mean "the tasks to be performed by NorthStar" (Dane PFT at 38:20-21).

Q.JP:DPS.1-37: State whether Mr. Dane believes that NorthStar must obtain a single bond, rather than multiple bonds (one for each task in the pay-item disbursement schedule), to cover the scope of the tasks to be performed by NorthStar. Explain the basis for the response.

- a. If Mr. Dane believes NorthStar must obtain a single bond, identify any examples where such a bond has been obtained on a decommissioning project and/or any basis for believing that such a bond is available on the market.

Q.JP:DPS.1-38: State Mr. Dane's basis (Dane PFT at 44:2-3) for assuming that project costs increase by 25% over NorthStar's estimate.

- a. Identify all specific past decommissioning projects that Mr. Dane considers to have involved a 25% or greater cost increase.
- b. In all such projects, state whether and to what extent the cost increase concerned (i) radiological decommissioning expenses; (ii) site restoration expenses; and/or (iii) spent nuclear fuel-related expenses.

Q.JP:DPS.1-39: State Mr. Dane's basis (Dane PFT at 62:19-20) for stating that "NorthStar does not appear to be under any obligation to provide funds" if a request is made by NorthStar VY under the support agreement.

Requests Regarding the Four Points Group (Brewer/Maret) Report

Q.JP:DPS.1-40: Explain what “industry experience” is, as used at Report page 1.

Q.JP:DPS.1-41: Explain the basis for the Report’s assertion (at page 3, footnote 6) that, in the case of “rip and ship” decommissioning, “the cost for disposal of additional material as radioactive waste can easily exceed the savings in survey costs.”

- a. Do Messrs. Brewer and Maret contend or conclude that *NorthStar*’s cost for disposal for additional material as radioactive waste will exceed the savings in survey costs?
- b. If so, what is the basis for that contention or conclusion? Produce any documents relied upon.

Q.JP:DPS.1-42: Admit that in comparing disposal costs to survey costs, one has to consider not only the costs of conducting the surveys, but also the time added to the schedule to conduct the surveys because any delay in schedule will likely increase costs. If denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.

- a. If admitted, provide an estimate of the extra time and extra costs.
- b. If admitted, explain in detail whether and how these costs were factored into the Report’s comparative analysis.

Q.JP:DPS.1-43: Admit that, in determining the amount of time necessary to conduct detailed characterization, one has to consider (1) the up-front engineering to design the characterization study; (2) the sampling, (3) the analysis of samples, and (4) the reporting on the analysis. If denied, explain in detail the basis for your denial. If neither admitted nor denied, explain in detail the basis for your response.

- a. If admitted, provide an estimate of the extra time and extra costs.

Q.JP:DPS.1-44: Regarding the “rip and ship” method:

- a. Identify any sites that have used the “rip and ship” method.
- b. Explain what involvement, if any, Messrs. Brewer and Maret had or have with the decommissioning and site restoration of those sites.
- c. State whether Messrs. Brewer or Maret have had any involvement with the decommissioning and site restoration of the Zion site.

- d. Explain the basis for the statement that “the cost of disposal of additional material as radioactive waste can easily exceed the savings in survey costs.” Report p. 3 n.6.
- e. For the sites that have used “rip and ship,” have incremental disposal costs been less than avoided survey costs?
 - i. If so, by how much at each such site?
 - ii. Have Messrs. Brewer and/or Maret studied whether those factors apply to the VY Station site? Explain your response.

Q.JP:DPS.1-45: Regarding the Report’s assertion that the decommissioning process “*generally* begins with a detailed characterization of the site” (Report p. 3 (emphasis added)):

- a. Explain whether there are any exceptions to this “general” approach.
- b. State whether “rip and ship” is one such exception.
- c. Identify all sites that were exceptions to this “general” approach.

Q.JP:DPS.1-46: Regarding that same table at page 5 of the Report, admit that returning the site to productive use sooner is another advantage of DECON that is not listed in the table. If denied, explain in detail the basis for the denial. If neither admitted nor denied, explain in detail the basis for your response.

Q.JP:DPS.1-47: Explain the meaning of the proviso “if the estimates are based on consistent assumptions” (Report p. 7).

Q.JP:DPS.1-48: Do Messrs. Brewer and Maret contend that Entergy is capable of “adopt[ing] the same assumptions NorthStar makes” (Report p. 9)?

- a. If so, explain the basis for that contention.

Q.JP:DPS.1-49: Identify all prior projects and the contingencies each project assumed, that support the Report’s statement that “the performance risk contingency typically included in decommissioning estimates ranges from approximately 15 percent to 25 percent.” Report p. 10.

Q.JP:DPS.1-50: Do Messrs. Brewer and Maret claim that unknown conditions similar to that described at “the Yankee Atomic site” will be found at VY?

- a. If so, identify the unknown conditions that were found at the Yankee Atomic site that provide the basis for the claim that similar conditions will be found at the VY Station site.

- b. Produce any documents relied upon.

Q.JP:DPS.1-51: Identify any task or process for site characterization that has not yet been performed at the VY Station site but would be necessary to accomplish a “complete and thorough site characterization.” Report p. 12.

- a. Explain what task could be performed to “address the depth of contamination and hence the amount of material that would have to be removed in decommissioning.” Report p. 14.
- b. State how much such site characterization would cost and how long it would take to complete.

Q.JP:DPS.1-52: The VY Station completed radiological and non-radiological Historical Site Assessments in 2014, a conceptual site model report for groundwater, a non-radiological Phase I environmental assessment in 2017, and a Phase I/Phase II environmental assessment in 2001. How do these site assessment and characterization efforts compare to such efforts done early in the decommissioning process at Yankee Rowe?

Q.JP:DPS.1-53: Regarding the quotations from the EPRI report at page 12 of the Four Points Group report, admit that the full quotation from the EPRI report reads: “In retrospect, the development of a thorough HSA aided the decommissioning greatly at CY as it helped locate sources of groundwater contamination and other areas where remediation was needed. It is recommended that a thorough site characterization be performed early in the decommissioning if not prior to permanent shutdown. The results of a site characterization may effect [*sic.*] how the decommissioning is conducted.” If denied, explain in detail the basis for the denial. If neither admitted nor denied, explain in detail the basis for the response.

Q.JP:DPS.1-54: Explain Messrs. Brewer’s and Maret’s basis for concluding that any of the four examples given at the top of page 15 of the Report are likely to occur at the VY Station.

Q.JP:DPS.1-55: Provide the increased cost associated with each of examples 2, 3, and 4 (Report p. 15).

Q.JP:DPS.1-56: Identify when the Yankee Rowe and Connecticut Yankee decommissioning projects were completed, and identify when Four Points last had participation in these projects.

Q.JP:DPS.1-57: As to the Connecticut Yankee example discussed at page 17 of the Report:

- a. Explain Messrs. Brewer’s and Maret’s basis for claiming that the example on page 17 of the Report will occur and cause similar impact to decommissioning at the VY Station.

- b. Explain the cost increase associated with the example on page 17 of the Report at Connecticut Yankee.

Q.JP:DPS.1-58: As to the SONGS example at page 17 of the Report:

- a. Explain Messrs. Brewer's and Maret's basis for claiming that the example will occur and cause similar impact to decommissioning at the VY Station.
- b. Explain the cost increase associated with the example at SONGS.

Q.JP:DPS.1-59: As to the Yankee Atomic example at page 17-18 of the Report:

- a. Explain Messrs. Brewer's and Maret's basis for claiming that the example will occur and cause similar impact to decommissioning at the VY Station.
- b. Explain the cost increase associated with the example at Yankee Atomic.

Q.JP:DPS.1-60: Identify all prior sites where "some sort of fuel handling event while loading or transferring spent fuel to the ISFSI" (Report p. 18) has occurred.

Q.JP:DPS.1-61: What do Messrs. Brewer and Maret propose so that NorthStar's decommissioning plan and cost estimate adequately takes into account "Unanticipated Costs From Changing Conditions" (Report p. 18)? Explain the basis for the answer.

Q.JP:DPS.1-62: Explain Messrs. Brewer's and Maret's basis for claiming that the cost increase at Humboldt Bay (Report p. 19) will occur and cause similar impact to decommissioning at the VY Station.

- a. Identify any characteristics of Humboldt Bay (including without limitation the location of the reactor vessel underground and below sea level) that made Humboldt Bay a more costly decommissioning project relative to the VY Station.

Q.JP:DPS.1-63: Regarding the Four Points Group Report's statement that "[s]ome of the costs for repackaging will be costs identified in the Standard Contract as being the responsibility of the plant licensee" (Report p. 21), explain with specificity which costs will be the responsibility of the plant licensee and which costs will be the responsibility of DOE.

Q.JP:DPS.1-64: Identify all licensees of which Messrs. Brewer or Maret are aware that have planned for repackaging in their irradiated fuel management plan filings with the NRC that are required by 10 CFR § 50.54(bb).

Q.JP:DPS.1-65: Admit that the NRC-approved December 19, 2014 irradiated fuel management plan for the VY Station reflects the same cost assumptions regarding cask transfer as

NorthStar's assumptions. If denied, explain in detail the basis for the denial. If neither admitted nor denied, explain in detail the basis for the response.

Q.JP:DPS.1-66: State whether Messrs. Brewer's and Maret's estimates of time lags before a licensee receives spent nuclear fuel cost recoveries from DOE are based on actual experience under a DOE settlement agreement that is already in place, or instead are based on experience with litigation. Identify all examples and produce all documents relied upon.

Q.JP:DPS.1-67: State the estimated amount of "added costs related to the timing of expenses compared to recovery from DOE even if the actual costs were 100 percent recoverable." Report p. 22. Produce any documents relied upon.

Q.JP:DPS.1-68: Identify any examples of other nuclear plant licensees' decommissioning cost estimates that take into account the costs discussed on pages 20 to 28 of the Report.

Q.JP:DPS.1-69: State what percentage of recovery of spent fuel costs from DOE Messrs. Brewer and Maret believe to be reasonable.

- a. State what percentage other licensees have assumed in Messrs. Brewer's and Maret's experience. Identify those licensees and produce any documents relied upon.

Q.JP:DPS.1-70: Define "contaminated material" as used at page 29 of the Report.

Q.JP:DPS.1-71: Estimate the cost associated with "[s]preading contamination" (Report p. 31), including measures to mitigate or to avoid such cost.

Q.JP:DPS.1-72: State the basis for Messrs. Brewer's and Maret's assertion that NorthStar plans to leave "subsurface equipment" (Report p. 35) other than piping in place.

Q.JP:DPS.1-73: State what Messrs. Brewer and Maret would deem a reasonable estimate of the costs for GTCC waste disposal. Produce any supporting workpapers and/or documentation.

Q.JP:DPS.1-74: Identify the other plants relied on to support the assertion (Report p. 38) that "the total contingency is normally between 15 and 20 percent with some estimates going as high as 25 percent."

- a. State in each case whether the estimate was based on a DECON, delayed DECON, or SAFSTOR approach.
- b. State whether the contingency in each case was "for performance risk is expected to be expended over the course of decommissioning" (p. 10).

Requests for Gregory Maret

Q.JP:DPS.1-75: Identify, list and produce all exhibits to be introduced or used at hearing in support of the prefiled testimony of Gregory A. Maret in this proceeding.

Q.JP:DPS.1-76: Identify, list and produce all documents, data compilations, electronically stored information, photographs, workpapers or other tangible things provided to, exchanged with, prepared by, reviewed by, relied upon or used by Mr. Maret in developing his prefiled testimony and the opinion(s) underlying his prefiled testimony, including but not limited to, all exhibits to his prefiled testimony, to the extent not already produced.

Q.JP:DPS.1-77: Identify all assumptions, materials, inputs, data or information provided to Mr. Maret in connection with his preparation of prefiled testimony.

Q.JP:DPS.1-78: Identify and describe all previous work (including cost estimation and funding analysis) Mr. Maret has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration and produce all documents relating to all previous work Mr. Maret has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

- a. Identify all regulatory proceedings by jurisdiction, date, docket number, and name in which Mr. Maret has testified or provided consulting or expert support for witnesses testifying on nuclear decommissioning, spent nuclear fuel management and/or site restoration projects.

Q.JP:DPS.1-79: Identify and describe all previous work Mr. Maret has undertaken relating to any of the Joint Petitioner parties, or related entities.

Q.JP:DPS.1-80: State the basis for Mr. Maret's conclusions that NorthStar "relies on decontamination for more than is typical" and "anticipates those [decontamination] activities would reduce the amount of contaminated material that must be packaged, shipped to, and disposed of at a licensed facility." Maret PFT at 5:13-15.

Q.JP:DPS.1-81: State the basis for Mr. Maret's conclusion that NorthStar "relies on use of fixatives to reduce the amount of contaminated material that must be disposed of at a licensed facility." Maret PFT at 5:19-20.

Q.JP:DPS.1-82: State the basis for Mr. Maret's suggestion (Maret PFT at 7:16-18) that issues encountered at Connecticut Yankee will be encountered at the VY Station.

Q.JP:DPS.1-83: State the basis for Mr. Maret's suggestion (Maret PFT at 8:16-9:5) that "scope risk[s]" encountered at Connecticut Yankee, Southern California Edison, and Yankee Atomic will be encountered at the VY Station.

Q.JP:DPS.1-84: State Mr. Maret's understanding of what NorthStar assumes regarding the volume of contaminated concrete and soil that will be removed to complete decommissioning as he defines that term.

- a. State Mr. Maret's understanding of what NorthStar assumes regarding the cost of removing such concrete and soil.

Q.JP:DPS.1-85: State Mr. Maret's basis for concluding that NorthStar's "approach involve[s] use of decontamination services, use of fixatives, and use of explosives in demolition activities." Maret PFT at 13:16-18.

- a. State Mr. Maret's understanding of where, how, under what circumstances, and with what protections NorthStar intends to proceed with these approaches.

Q.JP:DPS.1-86: Identify each and every source of information and the location within such source that form the basis for Mr. Maret's determination of "NorthStar's assumptions relate[d] to ... waste burial rates." Maret PFT at 13:18-19.

Requests for Warren Brewer

Q.JP:DPS.1-87: Identify, list and produce all exhibits to be introduced or used at hearing in support of the prefiled testimony of Warren K. Brewer in this proceeding.

Q.JP:DPS.1-88: Identify, list and produce all documents, data compilations, electronically stored information, photographs, workpapers or other tangible things provided to, exchanged with, prepared by, reviewed by, relied upon or used by Mr. Brewer in developing his prefiled testimony and the opinion(s) underlying his prefiled testimony, including, but not limited to, all exhibits to his prefiled testimony, to the extent not already produced.

Q.JP:DPS.1-89: Identify all assumptions, materials, inputs, data or information provided to Mr. Brewer in connection with his preparation of prefiled testimony.

Q.JP:DPS.1-90: Identify and describe all previous work (including cost estimation and funding analysis) Mr. Brewer has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration and produce all documents relating to all previous work Mr. Brewer has undertaken with regard to nuclear decommissioning, spent nuclear fuel management, and/or site restoration projects.

- a. Identify all regulatory proceedings by jurisdiction, date, docket number and name in which Mr. Brewer has testified or provided consulting or expert support for witnesses testifying on nuclear decommissioning, spent nuclear fuel management and/or site restoration projects.

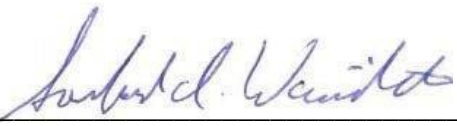
Q.JP:DPS.1-91: Identify and describe all previous work Mr. Brewer has undertaken relating to any of the Joint Petitioner parties, or related entities.

Q.JP:DPS.1-92: Provide the exact amount paraphrased as "hundreds of millions of dollars." Brewer PFT at 8:21-22. Explain how this amount was calculated.

Q.JP:DPS.1-93: Provide the citation for the source quoted at Brewer PFT at 41:4-6.

DATED: September 7, 2017

Respectfully submitted,
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Attorneys for Entergy Nuclear Vermont Investment
Company, LLC, Entergy Nuclear Operations, Inc.,
and Entergy Nuclear Vermont Yankee, LLC

By: 

Sanford I. Weisburst*
Ellyde R. Thompson*
Ingrid E. Scholze*
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7170
sandyweisburst@quinnemanuel.com

*admitted *pro hac vice*

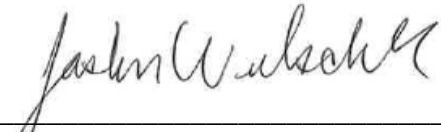
John Marshall
Downs Rachlin Martin PLLC
90 Prospect Street
St. Johnsbury, VT 05819-2241
(802) 748-8324
jmarshall@drm.com

Daniel Richardson
Tarrant, Gillies & Richardson
44 East State Street
P.O. Box 1440
Montpelier, Vermont 05601-1440
(802) 223-1112
drichardson@tgrvt.com

PRIMMER PIPER EGGLESTON & CRAMER PC
Attorneys for NorthStar Decommissioning
Holdings, LLC, NorthStar Nuclear

Docket No. 8880
Joint Petitioners' First Set of Discovery
Requests to the Vermont Public Service Department
September 7, 2017

Decommissioning Company, LLC, NorthStar
Group Services, Inc., LVI Parent Corp., and
NorthStar Group Holdings, LLC

By: _____

Joslyn L. Wilschek
100 East State Street, P.O. Box 1309
Montpelier, VT 05601-1309
(802) 223-2102
jwilschek@primmer.com