

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL**

---

**In the Matter of  
South Texas Project Nuclear Operating Co.  
Application for the South Texas Project  
Units 3 and 4  
Combined Operating License**

**Docket Nos. 52-012, 52-013  
January 3, 2011**

---

**INTERVENORS' TWENTY-SEVENTH UPDATE TO DISCLOSURES**

Pursuant to 10 C.F.R. § 2.336 and the Initial Scheduling Order dated October 20, 2009, Intervenor state the following:

1. Enclosure 1 provides the names, addresses, and telephone numbers of the persons upon whose opinion Intervenor will base its positions on the contentions and upon whom Intervenor may rely as a witness. Their testimony has previously been filed in the docket.
2. All documents in the possession, custody, or control of the Intervenor are contained in the exhibit list, which has previously been filed in the docket.

Respectfully submitted,

/s/ Robert V. Eye  
\_\_\_\_\_  
Robert V. Eye, Kan. Sup. Ct. No.10689  
Kauffman & Eye  
123 SE 6th Ave., Suite 200  
Topeka, Kansas 66603  
785-234-4040  
bob@kauffmaneye.com

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL**

---

**In the Matter of  
South Texas Project Nuclear Operating Co.  
Application for the South Texas Project  
Units 3 and 4  
Combined Operating License**

---

**Docket Nos. 52-012, 52-013**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2011 a copy of “Intervenors’ Twenty-Seventh Update to Disclosures” was served by the Electronic Information Exchange on the following recipients:

Administrative Judge  
Michael M. Gibson, Chair  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [mmg3@nrc.gov](mailto:mmg3@nrc.gov)

Administrative Judge  
Dr. Randall J. Charbeneau  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [Randall.Charbeneau@nrc.gov](mailto:Randall.Charbeneau@nrc.gov)

Administrative Judge  
Dr. Gary S. Arnold  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [gxa1@nrc.gov](mailto:gxa1@nrc.gov)

Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Mail Stop O-15D21  
Washington, DC 20555-0001  
Michael Spencer, Sara Kirkwood,  
Jessica Bielecki, Anthony Wilson  
E-mail: [Michael.Spencer@nrc.gov](mailto:Michael.Spencer@nrc.gov)  
[Sara.Kirkwood@nrc.gov](mailto:Sara.Kirkwood@nrc.gov)  
[Jessica.Bielecki@nrc.gov](mailto:Jessica.Bielecki@nrc.gov)  
[Anthony.Wilson@nrc.gov](mailto:Anthony.Wilson@nrc.gov)

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Rulemakings and Adjudications Staff  
Washington, DC 20555-0001  
E-mail: [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)

Office of Commission Appellate  
Adjudication  
U.S. Nuclear Regulatory Commission  
Mail Stop: O-16C1  
Washington, DC 20555-0001  
E-mail: [ocaamail@nrc.gov](mailto:ocaamail@nrc.gov)

Counsel for STP Nuclear Operating  
Company

Steven P. Frantz

Stephen J. Burdick

Alvin Gutterman

John E. Matthews

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Phone: 202-739-3000

Fax: 202-739-3001

E-mail: sfrantz@morganlewis.com

sburdick@morganlewis.com

agutterman@morganlewis.com

jmatthews@morganlewis.com

Charles B. Moldenhauer

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Phone: 202-739-3000

Fax: 202-739-3001

cmoldenhauer@morganlewis.com

*Signed (electronically) by Robert V. Eye*

Robert V. Eye

Counsel for the Petitioners

Kauffman & Eye

123 SE 6<sup>th</sup> Ave., Suite 200

Topeka, KS 66603

E-mail: bob@kauffmaneye.com

Enclosure 1  
INTERVENOR WITNESSES

*The name and, if known, the address and telephone number of any person, including any expert, upon whose opinion the party bases its claims and contentions and may rely upon as a witness:*

Clarence Johnson  
3707 Robinson Ave.  
Austin, Texas 78722  
Phone: 512-481-1311

Philip Mosenthal  
Optimal Energy  
14 School Street  
Bristol, VT 05443  
Phone: 802-453-5100