UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of: CALVERT CLIFFS 3 NUCLEAR PROJECT, LLC AND UNISTAR NUCLEAR OPERATING SERVICES, LLC

Docket No. 52-016-COL

(Calvert Cliffs Nuclear Power Plant, Unit 3)

APPLICANTS' SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1

In accordance with 10 C.F.R. § 2.336, the Discovery Disclosure Agreement among the parties dated April 7, 2009, and the Licensing Board's Order, dated April 22, 2009, Calvert Cliffs 3 Nuclear Project, LLC, and UniStar Nuclear Operating Services, LLC ("UniStar" or "Applicants") hereby supplement their disclosures with respect to Contention 1.

1. <u>Testifying Witnesses</u>

UniStar has not yet identified the persons upon whom it will rely as witnesses with respect to Contention 1. In accordance with 10 C.F.R. § 2.336(d), UniStar will supplement this disclosure after testifying witnesses are identified.

2. <u>Documents and Data Collections</u>

There are no new responsive documents this month for Contention 1.

Respectfully submitted,

/s/ signed electronically by

David A. Repka Tyson R. Smith Winston & Strawn LLP 1700 K Street, NW Washington, DC 20006

Carey W. Fleming Constellation Energy Nuclear Group, LLC 100 Constellation Way, Suite 200C Baltimore, MD 21202

COUNSEL FOR CALVERT CLIFFS 3 NUCLEAR PROJECT, LLC AND UNISTAR NUCLEAR OPERATING SERVICES, LLC

Dated at Washington, District of Columbia This 3rd day of January 2012

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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In the Matter of:

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Docket No. 52-016

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CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANTS' SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1" and "CERTIFICATION OF SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1" have been served upon the following persons via the Electronic Information Exchange ("EIE") this 3rd day of January 2012.

U.S. Nuclear Regulatory Commission Office of Commission Appellate Adjudication Mail Stop O-16C1 Washington, DC 20555-0001 E-mail: <u>ocaamail@nrc.gov</u>

Atomic Safety and Licensing Board Panel Mail Stop – T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Ronald M. Spritzer, Chair Administrative Judge E-mail: <u>rms4@nrc.gov</u>

Gary S. Arnold - Administrative Judge E-mail: <u>gxa1@nrc.gov</u>

William W. Sager - Administrative Judge E-mail: wws1@nrc.gov

Megan Wright - Law Clerk E-mail: <u>mxw6@nrc.gov</u> U.S. Nuclear Regulatory Commission Office of the Secretary of the Commission Mail Stop O-16C1 Washington, DC 20555-0001 E-mail: <u>hearingdocket@nrc.gov</u> U.S. Nuclear Regulatory Commission Office of the General Counsel Mail Stop – O-15 D21 Washington, DC 20555-0001

Marian Zobler, Esq. Susan Vrahoretis, Esq. Marcia J. Simon, Esq. Anthony Wilson, Esq. Adam Gendelman, Esq. Joseph Gilman, Paralegal E-mail: <u>Marian.Zobler@nrc.gov</u> <u>Susan.Vrahoretis@nrc.gov</u> <u>Marcia.Simon@nrc.gov</u> <u>Anthony.Wilson@nrc.gov</u> Joseph.Gilman@nrc.gov State of Maryland Office of the Attorney General Maryland Energy Administration and Power Plant Research Program of the Department of Natural Resources 1623 Forest Drive, Suite 300 Annapolis, Maryland 21403 Bret A. Bolea, Assistant Attorney General M. Brent Hare, Assistant Attorney General E-mail: <u>BBolea@energy.state.md.us</u> <u>bhare@energy.state.md.us</u>

OGC Mail Center: ogcmailcenter@nrc.gov

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Public Citizen 215 Pennsylvania Avenue, SE Washington, DC 20003 Allison Fisher, Organizer – Energy Program E-mail: <u>afisher@citizen.org</u> William Johnston 3458 Holland Cliffs Road Huntingtown, MD 20639 E-mail: <u>wj3@comcast.net</u> Cathy Garger 10602 Ashford Way Woodstock, MD 21163 E-mail: savorsuccesslady3@yahoo.com

/s/ signed electronically by

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COUNSEL FOR CALVERT CLIFFS 3 NUCLEAR PROJECT, LLC AND UNISTAR NUCLEAR OPERATING SERVICES, LLC

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CALVERT CLIFFS 3 NUCLEAR)
PROJECT, LLC AND UNISTAR)
NUCLEAR OPERATING SERVICES,)
LLC)

Docket No. 52-016-COL

(Calvert Cliffs Nuclear Power Plant, Unit 3)

CERTIFICATION OF SUPPLEMENTAL DISCLOSURES FOR CONTENTION 1

I, Carey W. Fleming, do hereby state as follows:

- 1. I am employed as the Senior Counsel for Constellation Energy Nuclear Group, LLC. Working with attorneys for the Applicants on behalf of UniStar Nuclear Energy, I have been responsible for managing the searches, collection, and compilation of documents, data compilations, and tangible things to comply with the mandatory disclosure requirements in 10 C.F.R. § 2.336.
- 2. A search was conducted of documents, data compilations, and tangible things under the custody and control of the Applicants for the types of information specified in 10 C.F.R. § 2.336(a). The search was based on information and documents reasonably available to the Applicants. The searches encompassed both electronic and paper documents.
- 3. I hereby certify that to the best of my knowledge, information, and belief all relevant materials required to be disclosed pursuant to 10 C.F.R. § 2.336(a) in the captioned proceeding have been disclosed, and that the disclosures are accurate and complete as of December 15, 2011.
- 4. I hereby certify under penalty of perjury that the foregoing is true and complete to the best of my knowledge, information, and belief.

Executed in accord with 10 C.F.R. § 2.304(d),

<u>/s/ Carey W. Fleming</u> Carey W. Fleming Constellation Energy Nuclear Group, LLC 100 Constellation Way, Suite 200C Baltimore, MD 21202

Dated at Baltimore, Maryland this 3rd day of January 2012