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April 3, 2006

VIA EMAIL & FIRST CLASS MAIL

Richard Webster, Esq.
Rutgers Environmental Law Clinic
123 Washington Street
Newark, NJ 07102-5695

RE: Disclosures Pursuant to 10 CFR § 2.336; *AmerGen Energy Co., LLC* (License
Renewal for the Oyster Creek Nuclear Generating Station), Docket No. 50-219

Mr. Webster:

Pursuant to 10 CFR § 2.336, AmerGen Energy Company LLC (AmerGen) is providing the attached disclosures with respect to Petitioners' drywell corrosion contention as admitted by the Licensing Board on February 27, 2006 (LBP-06-07). In order to compile these attachments, a search was conducted of files in AmerGen's possession, custody, or control. Attached is a supporting affidavit. AmerGen's initial disclosures consist of the following:

- Attachment 1 is reserved for the names, addresses, and telephone numbers of the persons upon whose opinion AmerGen will base its positions on the contention and who AmerGen may rely upon as a witness. AmerGen has not yet identified witnesses for any hearing on the contention.

- Attachment 2 provides a description by category and location of documents, data compilations and tangible things in the possession, custody, or control of AmerGen that may be relevant to the contention, but that are not privileged, otherwise protected, or publicly available. Because of the large volume of records, AmerGen has not reviewed every document identified in these attachments to confirm its relevance or to determine whether it contains proprietary information. This is especially the case for documents stored electronically, on microfiche/film, or offsite. We will make those determinations only if you request copies of specific documents. Thus, Attachment 2 is likely to be over *inclusive* in some respects and our references to categories of records do not constitute an admission that each and every record in such categories is relevant or that there is no protected information contained therein.

Attachment 2 has two parts: A and B. Section A describes documents, data compilations and tangible things maintained both: in paper by individuals at the Oyster Creek Nuclear Generating Station (OCNGS) in Forked River, New Jersey, at Kennett Square, Pennsylvania, and communally by the license renewal group at Kennett Square; as well as documents maintained in electronic form (e-mail, Word, Excel, etc.) by individuals or on shared drives at OCNGS and at Kennett Square.

Part B provides thirteen spreadsheets generated from searches of various databases maintained within the Oyster Creek central electronic document management systems (EDMS). These spreadsheets identify, among other things, the format and location for each document using the following legend:

Y2View or FYView	record is in electronic format (i.e. paper record was scanned as an electronic file). The record may also have a "Box Number" indicating that the original document resides off-site at a long-term storage facility in Pennsylvania.
Notepad	record is a hard copy only (i.e., has not been scanned) and resides either at OCNGS or, if associated with a "Box Number," off-site.
WinWord	record is in electronic, native format
Image	record is a drawing in electronic form (i.e. paper drawing was scanned)
Film No.	record is stored on microfilm/microfiche at OCNGS. The record may also have a "Box Number" indicating that the original document resides off-site at a long-term storage facility in Pennsylvania.
NUS	record is stored off-site at a long-term storage facility in Pennsylvania.
IRM-C-OC	record is a hard copy stored at OCNGS

Some entries on these spreadsheets may be duplicates because individual documents may have been catalogued in multiple databases.

- Attachment 3 provides a list of documents otherwise required to be disclosed for which a claim of privilege or protected status (e.g., proprietary information) is being made, together with sufficient information for assessing the claim of privilege or protected status of the documents.

Attachment 3 also has two parts: A and B. Part A is a privilege log. AmerGen and

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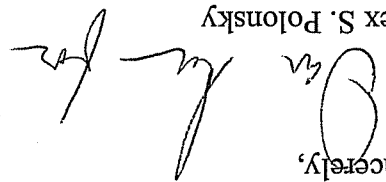
Petitioners have agreed that they need not include attorney-client privileged communications, or work product records created primarily to facilitate preparation of pleadings and mandatory disclosures associated with the NRC OCONGS license renewal proceeding.

Part B describes documents, data compilations and tangible things that are otherwise protected from disclosure because they are proprietary: they contain confidential commercial or financial information of the type customarily held in confidence by AmerGen. AmerGen will provide these documents only after the Board has entered a Protective Order and you have signed and returned to AmerGen a Non-Disclosure Agreement. As we discussed, you would only be able to share these proprietary documents with your clients' representatives who have signed and returned the Non-Disclosure Agreement.

- Finally, Attachment 4 provides a list of documents, data compilations, and tangible things that must be disclosed, but are publicly available from another source. Each of these documents is available from the U.S. Nuclear Regulatory Commission unless otherwise stated.

In the event that AmerGen identifies additional relevant documents or the witnesses for any hearing on the contention, AmerGen will update these initial disclosures as required by 10 C.F.R. § 2.336(d).

Sincerely,

Alex S. Polonsky


Attachments

cc: A. Hodgdon, NRC Staff Counsel

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
E. Roy Hawken, Chair
Dr. Paul B. Abramson
Dr. Anthony J. Baratta

Docket No. 50-219

In the Matter of:
AmerGen Energy Company, LLC
(License Renewal for Oyster Creek Nuclear
Generating Station)

AFFIDAVIT

1. My name is Thomas E. Quintenz. I am employed by AmerGen Energy Company, LLC as a Site Lead License Renewal Engineer.
2. This Affidavit relates to the initial mandatory disclosures that AmerGen intends to provide on April 3, 2006, in the above-captioned proceeding pursuant to 10 CFR § 2.336(a).

3. A reasonable search was conducted of AmerGen's files at the Oyster Creek Nuclear Generating Station (OCNGS) in Forked River, New Jersey, the files of the license renewal team located in Kennett Square, Pennsylvania, and Morgan Lewis' files, for the types of information specified in 10 CFR § 2.336(a). This search encompassed communal files and the files of individuals, both electronic and paper, who had responsibility with respect to matters related to Petitioners' drywell contention as admitted by the Licensing Board on February 27, 2006 in LBP-06-07.

4. Attachments 2, 3, and 4, identify the relevant documents that were located as a result of this search.

5. These disclosures are accurate and complete as of March 15.

I hereby swear and affirm that the foregoing is true and correct to the best of my knowledge,
information, and belief.

Thomas E. Guiton
Signature

Sworn before me this 31 day of March 2006.

Marita Zarembo
Notary Public

