

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Docket No. 8880

**Joint Petition of NorthStar Decommissioning Holdings, LLC)
NorthStar Nuclear Decommissioning Company, LLC, NorthStar)
Group Serviced, Inc., LVI Parent Corporation, NorthStar Group)
Holdings, LLC, Entergy Nuclear Vermont Investment Company)
LLC and Entergy Nuclear Operation, 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. secs. 107, 231, and 232)**

**NEW ENGLAND COALITION MOTION TO AMEND
PREFILED TESTIMONY OF RAYMOND SHADIS**

The New England Coalition moves pursuant to Board Rule 2.204(G) to amend Mr. Shadis’s prefiled testimony as follows:

Page 7 -- Strike last line, running over onto the top of page 8 (referring to statements of Mr Holschuh).

Insert: I have also read and relied upon Mr. Holschuh’s prefiled testimony.

Page 16, middle paragraph, strike “take a hard stand on site release criteria”

Insert: like those in Maine, take the position that its radiological standard goes into effect when decommissioning has been completed after the NRC license has been terminated.

Pages 22-23 – Strike the sentence on the bottom of page 22 commencing “On June 11…” and strike the two quotations from Dr. Irwin on page 23.

Insert: I have read the prefiled testimony of witnesses Gerold Noyes, Chuck Schwer, Warren Brewer and Gregory Maret.

Page 23. In the first complete paragraph, strike: “Dr. Irwin’s statements. I have attached his complete affidavit as NEC-RS-PFT EXHIBIT 4.”

Insert: their statements.

Page 25 – Insert in Answer 15, after the word “First,” as Mr. Holschuh testifies,

NEC’s reasons for these amendments are set forth in NEC’s Memorandum in Opposition to Joint Petitioners’ Motion to Exclude Testimony of Raymond Shadis and Arnold Gundersen.

The amendments avoid the need for the Commission to rule on whether Mr. Shadis improperly relied on or cited to hearsay statements by Mr. Holschuh and Dr. Irwin. Mr. Holschuh submitted prefiled testimony after making the statements cited by Mr. Shadis. Witnesses Noyes, Schwer, Brewer and Maret submitted prefiled testimony that addresses the same issues as Dr. Irwin’s affidavit. The amendments also correct an error in drafting Mr. Shadis’s testimony; the purpose of the reference to New Jersey is to show that New Jersey’s radiological standard go into effect after decommissioning is complete (and not to state what those standards are).

Dated at Bristol, Vermont this 23rd day of October, 2017.

BY: /s/ James A. Dumont

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