

4. Attached hereto as **Cusimano Exhibit 4** is a true and correct copy of the discovery response in PSB Docket 7600 from ENVY provided by Timothy C. Trask, Chief Engineer of Boiling Water Reactors at the VY Station, to CLF's Requests for Admission and Discovery Requests, dated April 12, 2010.

Q.CLF:EN.1-8: Admit that the finding of tritium in groundwater at Vermont Yankee signals that there has been an unintended underground release of radioactive material.

a. If denied, identify all facts, and produce all documents on which Entergy VY relies to support its denial.

A.CLF:EN.1-8: OBJECTION. The question is vague and ambiguous and calls for speculation.

Without waiving any objection, Entergy VY responds:

ADMITTED that during the time period from November 2009 until February 15, 2010, a fluid stream containing radionuclides was released from a pipe tunnel on the west side of the AOG building at the VY Station. Further ADMITTED that the fluid stream release was not intended by Entergy VY. As to the general proposition that the finding of tritium in groundwater at the VY Station would in other instances "signal that there has been an unintended underground release of radioactive material," Entergy VY would have to speculate as to the factual predicate for such a proposition, so that it cannot admit or deny that aspect of the request to admit.

a. See A.CLF:EN.1-8.

Person Responsible for Response: Timothy C. Trask  
Title: Chief Engineer—Boiling Water Reactors  
Date: April 12, 2010