Re: G20130211

Dear Mr. Guzman,

We would like to submit the attached documents to the Petition Review Board to supplement the petition filed by Citizens Awareness Network, Alliance for a Green Economy, Vermont Citizens Action Network and Pilgrim Watch concerning Entergy and its subsidiaries’ financial qualifications to operate FitzPatrick, Vermont Yankee and Pilgrim reactors.

1. Entergy's Preliminary 2nd Quarter Earnings Guidance. This article provides some updated information on the financial performance of Entergy Wholesale Commodities in the second quarter of 2013. In keeping with the predictions already cited in our petition, Entergy saw lower second quarter earnings, attributed to continued low energy prices, and also to refueling and unplanned power outages. The refueling outages totaling 50 days at Pilgrim and Vermont Yankee are mentioned in the article as contributing to lower revenue and hurting company performance, but it should be noted that this average outage length of 25 days is within industry performance standards, and well above historical standards in the industry. Additionally, unplanned outages and power changes continue to plague the reactors at issue in our petition. At our hearing in April, we noted that the UBS predictions were likely best-case scenarios for Entergy's earning potential at the reactors in question because of very high percentages of uptime. We believe this recent second quarter report illustrates that Entergy continues to struggle financially due to the squeeze of energy prices and age-related outages.

2. Reports Regarding Entergy's Workforce Reductions. Entergy has announced plans to cut its workforce, and media reports last week predict major workforce reductions at Entergy nuclear facilities. While the extent of the reductions at the plants named in our petition have yet to be announced, there is already media reporting about significant workforce reductions at Vermont Yankee. We believe these developments are relevant to our petition and should raise further concern at NRC about Entergy’s cost-cutting measures.

3. “Renaissance in Reverse: Competition Pushes Aging U.S. Nuclear Reactors to the Brink of Economic Abandonment” by Mark Cooper, Senior Fellow for Economic Analysis, Institute for Energy and the Environment. Vermont Law School. This newly released analysis identifies several factors that have contributed to recent nuclear plant closures and identifies currently operating reactors in the US that have those risk factors. We call your attention to this report because it sums up several of the investment community's reports on economic distress in the U.S. nuclear fleet, and because it lists all three reactors named in our 2.206 petition in the list of reactors with particularly intense challenges.

Thank you for your continued attention to these important issues.

Sincerely,

Jessica Azulay
Organizer, Alliance for a Green Economy

Deb Katz
Executive Director, Citizens Awareness Network