

United States of America
Nuclear Regulatory Commission

Before the Secretary

In the Matter of
South Texas Project, Units 3 and 4
Combined Construction and Operating License

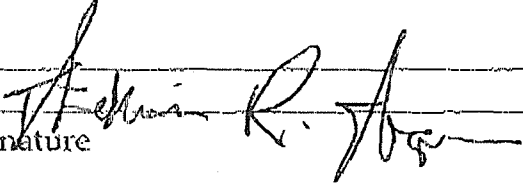
DOCKET NUMBERS 52-012 AND 52-013

Declaration of Bill Wagner

Under penalty of perjury, I, Bill Wagner, declare as follows:

1. My name is Bill Wagner. I am a member of Public Citizen, Inc.
2. My address is 2203 Belegarde, Bay City, Texas, 77414. I live approximately 18 miles from the South Texas Project site in Matagorda, for which NRC and partners seek a combined construction and operating license (COL) for Units 3 and 4 of the South Texas Project.
3. Based on the history of nuclear reactors to date, I believe that nuclear reactors are inherently dangerous. Thus, the construction of one or more new nuclear reactors close to my home could pose a grave risk to my health and safety. I am concerned about the risk of accidental releases of radioactive material and the potential harm to groundwater and surface waters. I am concerned that if an accident involving atmospheric release of radiological material were to occur, I could be killed or become very ill.
4. I believe that the South Texas Project COL application is inadequate as written and that my interests will not be adequately represented in this action without the opportunity of Petitioner to intervene as a party in the proceeding on my behalf.
5. In order to ensure that the licensing decision for the proposed Comanche Peak nuclear reactors protects my interest in a safe and healthy environment, I have authorized Public Citizen, Inc. to represent me in any licensing proceeding and/or related filing or rulemaking proceeding that concerns the safety and environmental impacts of the proposed South Texas Project nuclear reactors. I have also authorized Public Citizen, Inc. to take any legal actions that are necessary to ensure that the licensing proceeding and the rulemaking proceeding are conducted fairly, efficiently, and in a

manner that provides for the full consideration of all licensing issues that could affect my safety and the health of my environment.

Signature 

Date APRIL 17, 2009