

January 29, 2010

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE SECRETARY**

In the Matter of )  
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South Texas Project Units 3&4 )  
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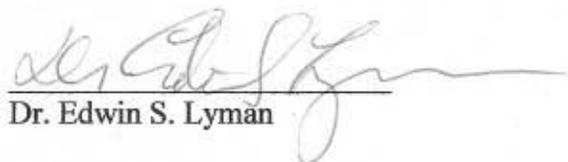
Docket No. 52-012 and 52-013

**DECLARATION OF DR. EDWIN S. LYMAN  
IN SUPPORT OF PETITIONERS' CONTENTIONS**

Under penalty of perjury,  
I, Dr. Edwin S. Lyman, declare as follows:

1. I am a Senior Staff Scientist with the Global Security Program at the Union of Concerned Scientists, 1825 K St, NW, Suite 800, Washington, D.C. 20006. My education and experience are described in my curriculum vita, which is included as an attachment to my declaration.
2. I am an expert in the technical analysis of safety, security and environmental issues related to nuclear facilities. I hold a Ph.D., a master of science degree, and a bachelor's degree in physics. For over fifteen years, I have conducted research on security and environmental issues associated with the management of nuclear materials and the operation of nuclear power plants. My research has included the safety and environmental risks posed by operation of nuclear power plants, including the ABWR and other nuclear power plants of similar designs. I have also published articles on this topic. A list of my publications is included in my C.V.
3. I am familiar with the South Texas Project 3&4 Environmental Report as it pertains to severe accident analyses. I am also familiar with the November 10, 2009 supplement to the ER, Section 7.5S, pertaining to the environmental impacts of severe accidents on co-located units. I am generally familiar with NRC technical studies of accident risks posed by nuclear power plants and their spent fuel, as well as NRC policies and regulations with respect to severe accident analysis and mitigation.
4. I am responsible for the factual content and expert opinions expressed in Petitioners' contention CL-1 regarding the inadequacy of the analysis of the co-location environmental impacts of severe accidents contained in Section 7.5S of the STP 3&4 Environmental Report.
5. I am familiar with the answers submitted by both the Applicant and the NRC Staff to Petitioners' contention CL-1.

6. I am responsible for the factual content and expert opinions expressed in Petitioners' reply to the answers submitted by the Applicant and the NRC Staff to contention CL-1. The facts presented in this reply are true and correct to the best of my knowledge, and the opinions expressed therein are based on my best professional judgment.



Dr. Edwin S. Lyman

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