



Nuclear Regulatory Commission  
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ROTHSTEIN

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UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety And Licensing Board

In the Matter of  
 Entergy Corporation  
 Pilgrim Nuclear Power Station  
 License Renewal Application

Docket # 50-293-LR

June 19, 2007

**DECLARATION OF RICHARD ROTHSTEIN IN SUPPORT OF PILGRIM  
 WATCH'S RESPONSE OPPOSING ENTERGY'S MOTION FOR SUMMARY  
 DISPOSITION OF PILGRIM WATCH CONTENTION 3**

I, Richard Rothstein prepared the attached Meteorological and Air Quality Modeling Considerations, applicable for various NRC Regulatory Licensing Programs (NRC Electronic Document Room, Accession Number ML070440358). I stand by the contents of my attached considerations today.

The considerations explain that for the Pilgrim NPS (as well as for other coastal-sited nuclear power plants), the conventional straight line Gaussian plume dispersion model should be replaced by models that can properly account for variable plume trajectories (i.e., varying wind flow conditions in time and space). Use of such improved modeling techniques will allow for more accurate and reliable predictions of potential consequences in a severe accident and to determine the best protective actions for emergency response.

I declare that under penalty of perjury that the foregoing is true and correct to the best of my understanding.

*Richard Rothstein*  
 Richard Rothstein, CCM, QEP