

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

THE STATE OF NEW YORK,)
THE STATE OF VERMONT, and)
THE STATE OF CONNECTICUT,)
)
Petitioners,)
)
against)
)
UNITED STATES NUCLEAR)
REGULATORY COMMISSION, and)
UNITED STATES OF AMERICA,)
)
)
Respondents.)

Docket No. 11-1045

DECLARATION OF PATRICK MULLIGAN

I, Patrick Mulligan, make this declaration upon personal knowledge:


1. I submit this declaration in support of the Motion to Intervene of the State of New Jersey in the above referenced matter.
2. I am a Manager in the Bureau of Nuclear Engineering ("BNE") in the New Jersey Department of Environmental Protection ("NJDEP"). The BNE is responsible for the continuous collection of radiological data from nuclear power plants in New Jersey to evaluate the impact of operation on the environment. The BNE is also responsible for the NJDEP's implementation of a comprehensive radiological emergency response in the event of an accident. As a manager in BNE, my responsibilities include ensuring staff engineers work closely with the Nuclear Regulatory Commission ("NRC") on site inspections at nuclear power plants to assure the overall safe operations of the power plant. I review and evaluate regulatory guidance, including proposed guidance, for nuclear power plant operation

issued by the NRC and the Department of Energy and Department of Homeland Security, and provide comments as necessary.

3. New Jersey has four operating nuclear power reactors: Oyster Creek Generating Station (“Oyster Creek”) in Forked River, New Jersey, Hope Creek (Unit One) in Hancocks Bridge, New Jersey, and Salem Nuclear Generating Station (Units 1 and 2), also in Hancocks Bridge, New Jersey. A December 2010 Administrative Consent Order between NJDEP and Exelon Generation Company, LLC, owner and operator of Oyster Creek, requires Oyster Creek to cease generation prior to January 1, 2020.

Pursuant to 28 U.S.C. § 1746, and under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge.

Executed on March 8, 2011.



Patrick Mulligan