

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

In re:

License Renewal Application Submitted by

**Entergy Nuclear Indian Point 2, LLC,
Entergy Nuclear Indian Point 3, LLC, and
Entergy Nuclear Operations, Inc.**

Docket Nos. 50-247-LR, 50-286-LR

ASLBP No. 07-858-03-LR-BD01

DPR-26, DPR-64

DECLARATION OF DAVID A. SCHLISSEL

David A. Schlissel, hereby declares under penalty of perjury that the following is true and correct:

1. I am a senior consultant at Synapse Energy Economics, Inc. (Synapse), an energy and economic consulting firm located in Cambridge, Massachusetts.
2. Synapse has been retained by the New York State Office of the Attorney General to provide expert services to the State of New York concerning the proposed relicensing of the two operating reactors located at the Indian Point Nuclear Power Station in the Village of Buchanan in Westchester County (Indian Point Unit 2 and Indian Point Unit 3).

3. When it is in service, Indian Point Unit 2 can produce up to 1,028 MW per year; Indian Point Unit 3 can produce up to 1,041 MW when it is in service. The Indian Point nuclear reactors, however, cannot run indefinitely. Approximately every 24 months, each reactor is taken off line for refueling and maintenance work. According to the Entergy's recent investor report, over the last two years, planned outages for maintenance and refueling at Indian Point Unit 2 and Unit 3 have lasted approximately three to four weeks (24 to 31 days). See Entergy Statistical Report and Investor Guide 2006, p. 52. In addition, from time to time, each unit may experience unplanned outages.

4. Attached hereto and made a part of this sworn statement is a report prepared by me concerning readily-available means to replace the power generated by Indian Point Unit 2 and/or Indian Point Unit 3. This report examines the availability of: (1) energy conservation and efficiency measures; (2) repowering of existing power plants; (3) renewable energy resources; (4) certain transmission system upgrades and enhancements; and (5) the potential for the addition of new generating facilities. See Synapse Energy Economics, Inc., "Report on the Availability of Replacement Capacity and Energy for Indian Point Units 2 and 3" (November 28, 2007).

5. To prepare the attached report, my staff and I have examined various publicly-available information, including, but not limited to, reports prepared by the

New York State Energy Research and Development Authority, the New York Independent System Operator, the New York State Department of Public Service, the U.S. Department of Energy, the U.S. Nuclear Regulatory Commission, Levitan & Associates for the County of Westchester, the New York State Reliability Council, and the National Academy of Sciences. I also examined the April 30, 2007 License Renewal Application filed by Entergy, the accompanying Environmental Report, and the Entergy Statistical Report and Investor Guide 2006.

6. The report that I prepared concludes that the capacity and energy provided by Indian Point Units 2 and 3 can be replaced if the Units are not relicensed. In particular, energy efficiency, renewable resources, the repowering of older generating facilities, transmission upgrades and new natural gas-fired generating facilities represent viable alternatives to the relicensing of Indian Point. Substantial reductions in peak demand and energy requirements will be achieved by 2013 under the state's newly announced "15 by 15" Clean Energy Plan. Significant amounts of new renewable resources will be available as a result of the state's renewable energy portfolio standard and other initiatives. In addition, thousands of megawatts ("MW") of new generating capacity can be provided by the repowering (i.e., rebuilding) of older generating facilities both along the Hudson River and in the downstate area of the state in New York City and on Long Island. At the same time, transmission system upgrades also can increase the amounts of

power that can provided to the downstate region of the State. Finally, there is the potential for the addition of several thousand megawatts of new generating capacity in the Hudson River Valley and in downstate New York.


7. Also attached hereto is a copy of my current Curriculum Vitae (CV).

8. The report and CV are true and correct to the best of my personal knowledge.

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

Dated:

November 28, 2007
Cambridge, Massachusetts


David A. Schlissel