

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Michael M. Gibson, Chairman
Dr. Gary S. Arnold
Dr. Randall J. Charbeneau

In the Matter of

NUCLEAR INNOVATION NORTH AMERICA
LLC

(South Texas Project Units 3 and 4)

Docket Nos. 52-12-COL and 52-13-COL

ASLBP No. 09-885-08-COL-BD01

NON-DISCLOSURE AFFIDAVIT

I, MICHAEL SHEEHAN, being duly sworn, state:
(Print Name)

1. I have read the April 26, 2012 Atomic Safety and Licensing Board Protective Order for Contention FC-1 issued in this combined license proceeding for STP Units 3 and 4, Docket Nos. 52-012-COL and 52-013-COL, and will comply in all respects with its terms and conditions regarding the Protected Information produced in connection therewith. I will protect and keep confidential all Protected Information in accordance with the terms of this Non-Disclosure Affidavit.

2. I will not disclose Protected Information to anyone except an authorized person. I will protect documents containing or revealing Protected Information in written or recorded form (including any portions of transcripts of in camera hearings, filed testimony, or any other documents that contain or reveal such Protected Information), so that the Protected Information contained therein remains at all times under the control of an authorized person and is not revealed to anyone else.

3. When not under my direct control or the direct control of another authorized person, I will keep and protect all documents containing or revealing Protected Information (including, without limitation, transcripts, pleadings that I may generate, and any notes and copies that I may make) in a secure locked place such as a filing cabinet, closet, or other

storage container. I will not transmit by facsimile transmission any material containing Protected Information.

4. Each document that contains or reveals Protected Information shall be marked "Contains Protected Information" in a conspicuous manner.

5. Neither during nor after this proceeding, will I publicly reveal any Protected Information that I receive by virtue of this proceeding as long as the information remains Protected Information and is not otherwise a matter of public record.

6. I acknowledge that any violation of the terms of this affidavit or the Atomic Safety and Licensing Board's Protective Order, which incorporates the terms of this affidavit, may result in the imposition of such sanctions on me that the Atomic Safety and Licensing Board or the Commission may deem to be appropriate.

WHEREFORE, I do solemnly agree to protect and keep confidential such Protected Information as may be disclosed to me in this proceeding, in accordance with the terms of this affidavit.

Michael Stukan
(Name)

Subscribed to and sworn before me this 22nd day of May, 2012.

Notary Public Annie D. Rogers

My commission expires: March 19, 2015

