

ATTACHMENT B

DECLARATION OF
ERICH PICA

BEFORE THE UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of) PACIFIC GAS & ELECTRIC COMPANY) (Diablo Canyon Power Plant)))))))	Docket Nos. 50-275, 50-323
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DECLARATION OF ERICH PICA

I, Erich Pica, hereby declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge.
2. I am President of Friends of the Earth. I have served in that position since November 2009. Friends of the Earth is a tax exempt, nonprofit environmental advocacy organization founded in 1969 by David Brower in part to protest safety- and environment-related issues at Diablo Canyon Nuclear Power Plant (Diablo Canyon) in Avila Beach, California. Friends of the Earth is headquartered and incorporated in the District of Columbia and has an office in Berkeley, California. I am also a member of Friends of the Earth.
3. I am familiar with the organization's mission, which is to defend the environment and create a more healthy and just world. One aspect of that mission is to engage in efforts to improve the environmental, health, and safety conditions at civil nuclear facilities licensed by the Nuclear Regulatory Commission and its predecessor agencies and oppose proposals to design and build new reactors subsidized with federal funds. To that end, Friends of the Earth utilizes its institutional resources, including legislative advocacy, litigation, and public outreach and education, to minimize the risks that nuclear facilities pose to its members and to the general public.

4. Friends of the Earth is a part of Friends of the Earth International, a federation of grassroots groups working in 74 countries on today's most urgent environmental and social issues. Friends of the Earth International is the world's largest grassroots environmental federation. In the United States, Friends of the Earth has more than 33,203 members in all 50 states, 6,707 of those members are in California. In addition to dues paying members, Friends of the Earth has 442,737 online activist supporters across the country with 64,739 of them in California.

5. Friends of the Earth relies on sound science and uses the law to advocate innovative strategies to conserve natural resources and protect public health and the environment. Friends of the Earth is engaged in a number of efforts before the Nuclear Regulatory Commission (NRC) to improve operating nuclear facilities and oppose new proposals and in litigation to support these efforts. The instant petition and request for a hearing in the NRC proceeding regarding Pacific Gas & Electric's (PG&E) Diablo Canyon Nuclear Power Plant (Diablo Canyon) in Avila Beach, California, is an integral part of our advocacy to address the environmental, health and safety impacts from Diablo Canyon.

6. Friends of the Earth's work on nuclear facilities and issues frequently appears in its publications, in its quarterly newsmagazine, and on the internet at its website at www.foe.org, its Facebook page and its Twitter feed. As President, I am familiar with Friends of the Earth's efforts to educate and inform our members and activists, including outreach to members on nuclear issues. Friends of the Earth's members rely on the organization to advocate before the NRC regarding nuclear facilities. They also rely on the organization to represent their interests by participating in rulemaking and other regulatory processes.

7. A major objective for Friends of the Earth is that members of the public have an opportunity to influence the outcome of government and corporate decisions that affect the lives

of many people. Thus the organization regularly advocates for transparency and openness in government and in corporate decision making. In particular, Friends of the Earth has sought for many years to increase public involvement in the decisions of the Nuclear Regulatory Commission and the nuclear industry.

8. Friends of the Earth members who own property and recreate in the area surrounding Diablo Canyon risk exposure to radiation from the plant. Possible radiation leaks from Diablo Canyon would affect those members' health and safety, diminish property values, and adversely impact the ecosystem of Central California.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed at Washington, DC, on June 4, 2014.



Erich Pica, President