

February 12, 2015

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE SECRETARY OF THE COMMISSION

In the Matter of )  
DTE ELECTRIC CO. ) Docket No. 52-033-COL  
(Fermi Nuclear Power Plant, Unit 3) )  
)

**DECLARATION OF MICHAEL J. KEEGAN**

Under penalty of perjury, I, Michael J. Keegan, declare as follows:

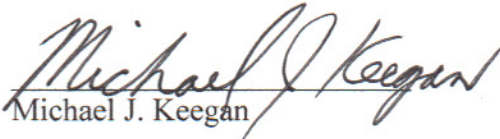
- I make this declaration of my own personal knowledge. If called to testify as a witness, I could and would testify competently regarding its contents.
- I am a current member of Beyond Nuclear. I agree with Beyond Nuclear’s mission of educating and activating the public about the connections between nuclear power and nuclear weapons and the need to abandon both to safeguard our future, including the risks associated with the inevitable generation of radioactive waste by the nuclear industry. I believe my health and well-being depend upon the health of the environment in the region where I live. I have authorized Beyond Nuclear to submit a contention on my behalf challenging the NRC’s failure to fully and adequately assess the environmental impacts of storing and disposing of the spent fuel that will be generated by the Fermi Unit 3 nuclear reactor, if it is licensed.
- I know that Beyond Nuclear submitted comments to the U.S. Nuclear Regulatory Commission (“NRC”) in 2013 regarding the NRC’s proposed rule entitled “Waste Confidence Decision - Continued Storage of Spent Nuclear Fuel,” which was published at 78 Fed. Reg. 56,776 on September 13, 2013 and its accompanying “Waste Confidence Generic Environmental Impact Statement,” published the same day.
- I live at 811 Harrison Street, Monroe, Michigan 48161. My home lies within ten miles of the proposed Fermi 3 nuclear reactor. This is less than the fifty-mile radius distance at which the U.S. Nuclear Regulatory Commission (“NRC”) presumes a reactor accident will cause harm to my health and safety.
- I am concerned about the health and environmental risks posed by the spent fuel that will be generated by Fermi Unit 3 if it is licensed. I am aware that Congress has established a policy that the spent fuel should be removed from the Fermi Unit 3 nuclear plant site to a repository for permanent disposal. But, I am concerned that permanent disposal of spent fuel may not be feasible. I am also concerned that the government will

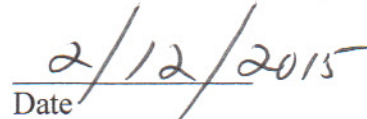
not find sufficient capacity in a repository or multiple repositories to accommodate the spent fuel to be generated by Fermi Unit 3. For these reasons, I am concerned that the Fermi Unit 3 reactor site may become a *de facto* long term spent fuel storage depot or even waste disposal site. I am concerned that spent fuel stored for a lengthy period at the Fermi Unit 3 site may leak into the environment and harm my health and threaten my safety. Additionally, I am concerned about the health and safety of future generations in my immediate and extended family, and protection of the environment.

- I am aware that NRC must conduct a full environmental review whenever it licenses or re-licenses a nuclear power plant. However, I am concerned that NRC has not adequately evaluated the environmental, health, and safety consequences of storing spent nuclear fuel at the Fermi Unit 3 nuclear plant site during the time following the licensed life of the reactor. In the absence of adequate environmental analyses regarding the storage of spent fuel, I do not have confidence that my health and safety or the integrity of my environment will be protected from the adverse effects of exposure to spent reactor fuel.

- I have authorized Beyond Nuclear to file a contention that seeks to raise my concerns in this proceeding. I believe this contention will redress my concerns by forcing the NRC to either conduct the required environmental analyses or deny the license application for Fermi Unit 3.

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

  
Michael J. Keegan

  
Date