

**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD**

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In re: Docket Nos. 50-247-LR; 50-286-LR
License Renewal Application Submitted by ASLBP No. 07-858-03-LR-BD01
Entergy Nuclear Indian Point 2, LLC, DPR-26, DPR-64
Entergy Nuclear Indian Point 3, LLC, and
Entergy Nuclear Operations, Inc. October 19, 2015
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DECLARATION OF LISA S. KWONG

Pursuant to 28 U.S.C. § 1746, Lisa S. Kwong hereby declares as follows:

1. I serve as an Assistant Attorney General for the State of New York, counsel for petitioner-intervenor State of New York in this proceeding. I submit this declaration and accompanying attachments in support of the State of New York’s motion for public disclosure of various Westinghouse documents.
2. Attached to this declaration as Attachment 1 is a true and correct copy of the NYS Table of 10 Documents Subject to the State’s Motion.
3. Attached to this declaration as Attachment 2 is a true and correct copy of Exhibit ENT000681; Westinghouse, WCAP-17199-P, Rev. 1; Environmental Fatigue Evaluation for Indian Point Unit 2; December 2014.
4. Attached to this declaration as Attachment 3 is a true and correct copy of Exhibit ENT000682; Westinghouse, WCAP-17200-P, Rev. 1; Environmental Fatigue Evaluation for Indian Point Unit 3; December 2014.
5. Attached to this declaration as Attachment 4 is a true and correct copy of Exhibit ENT000683; Westinghouse, Calculation Note CN-PAFM-13-32, Rev. 3; Indian Point Unit 2 (IP2) and Unit 3 (IP3) Refined EAF Analyses and EAF Screening Evaluations; June 25, 2015.

6. Attached to this declaration as Attachment 5 is a true and correct copy of Exhibit ENT000688; Westinghouse, Calculation Note CN-PAFM-13-40, Rev. 1; Indian Point Unit 2 and Unit 3 Pressurized Spray Nozzle Transfer Function Database Development and Environmental Fatigue Evaluations; January 15, 2015.

7. Attached to this declaration as Attachment 6 is a true and correct copy Exhibit ENT000689; Westinghouse, WCAP-12191, Rev. 4; Transient and Fatigue Cycle Monitoring Program Transient History Evaluation Report for Indian Point Unit 2; December 2014.

8. Attached to this declaration as Attachment 7 is a true and correct copy of Exhibit ENT000690; Westinghouse, WCAP-16898-P, Rev. 1; Indian Point Unit 3 Transient and Fatigue Cycle Monitoring Program Transient History Evaluation; May 2015.

9. Attached to this declaration as Attachment 8 is a true and correct copy of Exhibit NYS000363; Westinghouse, WCAP-17149-P, Rev. 1, Evaluation of Pressurizer Insurge/Outsurge Transients for Indian Point Unit 2 and Westinghouse, WCAP-17162-P, Rev. 1, Evaluation of Pressurizer Insurge/Outsurge Transients for Indian Point Unit 3; July 2010

10. Attached to this declaration as Attachment 9 is a true and correct copy of Exhibit NYS000364; Westinghouse, Calculation Note CN-PAFM-09-21; Indian Point Units 2 and 3 Charging Nozzles Environmental Fatigue Evaluation; June 18, 2010.

11. Attached to this declaration as Attachment 10 is a true and accurate copy of Exhibit NYS000365; Westinghouse, Calculation Note CN-PAFM-09-67; Pressurizer Surge Nozzle and Lower Head Transfer Functions for Indian Point Units 2 and 3; June 18, 2010.

12. Attached to this declaration as Attachment 11 is a true and accurate copy Exhibit NYS000367; Westinghouse, Calculation Note CN-PAFM-09-79; Indian Point Unit 2 Boron Injection Tank Nozzle Environmental Fatigue Evaluations; June 18, 2010.

13. Attached to this declaration as Attachment 12 is a true and correct copy of Exhibit

NYS000352; Entergy Communication, NL-10-082, Attachment 1 (NYS000352) (August 2010).

14. Attached to this declaration as Attachment 13 is a true and correct copy of E-mail from Lisa S. Kwong to Paul M. Bessette; Ccing Kathryn M. Sutton, Raphael Philip Kuyler, Sherwin Turk, Brian Harris, Deborah Brancato, Lisa M. Burianek, John J. Sipos, Mihir Desai, Brain Lusignan, and Teresa Manzi; Subject: IP – Notice of objection to proprietary/confidentiality designation; Attachments: 2015 09 17 NYS Notice of Objection to Proprietary Designation FINAL.pdf ; Sent: Thursday, September 17, 2015, 4:39 PM.

15. Attached to this declaration as Attachment 14 is a true and correct copy of E-mail from John J. Sipos to Paul M. Bessette and Raphael Philip Kuyler; Ccing Lisa M. Burianek, Brain Lusignan, Mihir Desai, Teresa Manzi, and Deborah Brancato; Subject: Entergy's August Non-Public Filings; Sent: Monday, August 31, 2015, 6:31 PM

16. Attached to this declaration as Attachment 15 is a true and correct copy of E-mail from Raphael Philip Kuyler to John J. Sipos and Paul M. Bessette; Ccing Lisa M. Burianek, Brain Lusignan, Mihir Desai, Teresa Manzi, Deborah Brancato, Kathryn M. Sutton, Sherwin Turk, and Martin O'Neill; Subject: RE: Entergy's August Non-Public Filings; Sent: Thursday, September 3, 2015, 8:55 AM.

17. Attached to this declaration as Attachment 16 is a true and correct copy of letter from Kathryn M. Sutton and Paul M. Bessette to Administrative Judges Lawrence G. McDade, Dr. Michael F. Kennedy and Dr. Richard E. Wardwell; Re: *Entergy Nuclear Operations, Inc.*, (Indian Point Nuclear Generating Units 2 and 3), Docket Nos. 50-247-LR and 50-286-LR – Redacted Filings for Track 2 Contentions; Sent: September 18, 2015.

18. Attached to this declaration as Attachment 17 is a true and correct copy of E-mail from Raphael Philip Kuyler to Lisa S. Kwong and Paul M. Bessette; Ccing Kathryn M. Sutton,

Sherwin Turk, Brian Harris, Deborah Brancato, Lisa M. Burianek, John J. Sipos, Mihir Desai, Brian Lusignan, Teresa Manzi and Martin O'Neill; Subject: RE: IP – Notice of objection to proprietary/confidentiality designation; Sent: Monday, October 5, 2015, 1:34 PM.

19. Attached to this declaration as Attachment 18 is a true and correct copy of Topical Report on ASME Section III Piping and Component Fatigue Analysis Utilizing the WESTEMS Computer Code,” WCAP-17577-NP, Rev. 2, June 2013 (ML13170A026).

20. Attached to this declaration as Attachment 19 is a true and correct copy of Ex. NYS000513, Kupper, C. and M. Gray, “License Renewal Environmental Fatigue Screening Application,” PVP2014-29093, ASME Pressure Vessels and Piping Conference in Anaheim, California (2014).

21. Attached to this declaration as Attachment 20 is a true and correct copy of WESTEMS™ Integrated Diagnostics and Monitoring Systems; Westinghouse Nuclear Services / Engineering Services; NS-ES 0078; March 2015.

22. Attached to this declaration as Attachment 21 is a true and correct copy of “EAF Screening: Process and Technical Basis for Identifying EAF Limiting Locations,” EPRI Report 1024995 (August 2012).

23. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 19, 2015

Signed (electronically) by

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