

**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. December 14, 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 Notice of Objection dated November 12, 2015.
3. Attached to this declaration as Attachment 2 is a true and correct copy of the e-mail thread between L. Kwong, R. Kuyler and S. Turk regarding the State's November 12, 2015 Objection and subsequent consultations.
4. Attached to this declaration as Attachment 3 is a true and correct copy of the letter from L. Kwong to P. Bessette and S. Turk dated December 10, 2015 regarding the State's proposed redactions to 20 exhibits, including the six exhibits which are the subject of the State's current motion.
5. Attached to this declaration as Attachment 4 is a true and correct copy of Exhibit ENTR00681; Westinghouse, WCAP-17199-P, Rev. 2; Environmental Fatigue Evaluation for

Indian Point Unit 2; 2015, marked with the State's proposed redactions.

6. Attached to this declaration as Attachment 5 is a true and correct copy of Exhibit ENTR00682; Westinghouse, WCAP-17200-P, Rev. 2; Environmental Fatigue Evaluation for Indian Point Unit 3; 2015, marked with the State's proposed redactions.

7. Attached to this declaration as Attachment 6 is a true and correct copy of Exhibit ENTR00683; Westinghouse, Calculation Note CN-PAFM-13-32, Rev. 4; Indian Point Unit 2 (IP2) and Unit 3 (IP3) Refined EAF Analyses and EAF Screening Evaluations; 2015, marked with the State's proposed redactions.

8. Attached to this declaration as Attachment 7 is a true and correct copy Exhibit ENTR00689; Westinghouse, WCAP-12191, Rev. 5; Transient and Fatigue Cycle Monitoring Program Transient History Evaluation Report for Indian Point Unit 2; 2015, marked with the State's proposed redactions.

9. Attached to this declaration as Attachment 8 is a true and correct copy of Exhibit ENTR00690; Westinghouse, WCAP-16898-P, Rev. 2; Indian Point Unit 3 Transient and Fatigue Cycle Monitoring Program Transient History Evaluation; 2015, marked with the State's proposed redactions.

10. Attached to this declaration as Attachment 9 is a true and correct copy of Exhibit ENT000727; Westinghouse, CN-PAFM-09-21, Rev. 4, Indian Point Units 2 and 3 Charging Nozzles Environmental Fatigue Evaluation, 2015, marked with the State's proposed redactions.

11. Attached to this declaration as Attachment 10 is a true and correct copy of the USNRC's November 19, 2015 License Renewal Inspection Report 05000286/2015011 for Indian Point Unit 3.

12. Attached to this declaration as Attachment 11 is a true and correct copy of the e-mail thread between L. Kwong and R. Kuyler on December 14, 2015 regarding the State's

November 12, 2015 Objection and subsequent consultations.

13. Attached to this declaration as Attachment 12 is a true and correct copy of the e-mail thread between L. Kwong and S. Turk on December 14, 2015 regarding the State's

November 12, 2015 Objection and subsequent consultations

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

Executed on December 14, 2015

Signed (electronically) by

Lisa S. Kwong
Assistant Attorney General
Office of the Attorney General
of the State of New York
The Capitol
Albany, New York 12224
(518) 776-2422
Lisa.Kwong@ag.ny.gov