

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

_____)	
Friends of the Earth, Nuclear)	
Information and Research Service,)	
and Hudson River Sloop)	
Clearwater,)	
)	
<i>Petitioners,</i>)	
)	No. 16-1189
<i>v.</i>)	
)	
United States Nuclear Regulatory)	
Commission,)	
)	
<i>Respondent.</i>)	
_____)	

**PETITIONERS’ STANDING SUPPLEMENT
AND NOTICE OF ERRATA**

Petitioners hereby submit additional declarations from members of petitioner-organizations and a notice of errata regarding the Emergency Petition for Writ of Mandamus filed on June 16, 2016.

1. As referenced in the Emergency Petition for Writ of Mandamus at page 9, footnote 3, and for purposes of demonstrating standing to seek an extraordinary writ, Petitioners hereby submit declarations from members of petitioner-organizations Nuclear

Information and Research Service and Hudson River Sloop Clearwater.

See Exhibit A.

2. As a result of a typographical error, the date of Friends of the Earth's Emergency Petition to Prohibit Restart of Indian Point Unit 2 and Inspect Indian Point Unit 3, filed with the Nuclear Regulatory Commission, was incorrectly listed as May 23, 2016. The correct date is May 24, 2016. This error appears in the Emergency Petition for Writ of Mandamus at pages ix, 2, 3, and 19.

3. On pages 5 and 13 of the Emergency Petition for Writ of Mandamus, "Times Square in New York City" should be replaced with "Manhattan."

Respectfully submitted,

/s/ Richard Ayres

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Dated: June 17, 2016

Counsel for Petitioners

EXHIBIT A

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT**DECLARATION OF WILLIAM H. FLANK**

I, William H. Flank, declare as follows:

1. I am a resident of Chappaqua, New York. My wife and I own a house at 1021 Hardscrabble Road and I have resided at this house since 1971 with my wife and, until they became adults, our two children. Our children and grandchildren regularly visit us a number of times a year at our home in Chappaqua.

We have been active members of the community during this time. I have served as the chair of the Environmental Review Board of the Town of New Castle for many years, and I have been Scoutmaster of Chappaqua Troop 1, BSA for over twenty-five years, among other activities. My wife and I were recognized with the Chappaqua Rotary Club's Community Service Award in 2007, and I have been named a Fellow in both the American Chemical Society and the standards organization ASTM International.

2. I am currently a member of Hudson River Sloop Clearwater, Inc. ("Clearwater"), and have been a member for more than twenty-five years because of my concerns regarding the environment, especially with respect to the Indian Point nuclear facility and the Hudson River.

3. Among its missions, Clearwater seeks to ensure that the public has an opportunity to understand and influence the outcome of governmental and corporate decisions that affect the lives of many people.

4. My home is about ten miles from Indian Point Energy Center ("Indian Point").

5. I am a semi-retired scientist with a substantial publications record, and I have also taught courses in chemistry, environmental science, statistics and mathematics at the undergraduate and graduate levels.

6. My personal health and safety, and my family's personal health and safety, will be seriously affected in the event that degraded bolts at Indian Point cause a radiation leak from the plant. Indian Point's operation without adequate assurance that its bolts will continue to properly function poses a significant risk to my personal health and safety and my family's health and safety.

7. We own a valuable residential property, as well as a bond in our local swim and tennis club, and derive income from teaching and consulting activities within a 50-mile area surrounding Indian Point. The value of my home will be adversely affected in the event of release or threatened release of

radioactivity at Indian Point, and our assets and our income will be adversely affected in the event of radiation release or threatened release of radioactivity from Indian Point.

8. I and my family, and the Scouts in my Boy Scout Troop, regularly participate in hiking, camping and boating activities numerous times a year and for many years, within a 50-mile area surrounding Indian Point.

9. The value of our real property assets is dependent on the attractiveness of our community and surrounding area, and negative events with respect to Indian Point would significantly reduce that value.

10. I have been actively involved for many years in efforts to protect and restore the environment around Indian Point, including researching and educating myself and others regarding the operations, incidents and activities related to Indian Point.

11. The restart of Indian Point without analysis of the root cause of the recently discovered baffle-former bolt degradation poses a significant risk to my personal health and safety, the health and safety of my family, the market value of our home, a portion of our income, and my interest in using and protecting the environment around Indian Point.

12. I authorize Hudson River Sloop Clearwater to file this petition on my behalf. I authorize Clearwater on my behalf to request a Writ of Mandamus to prevent the restart of Indian Point Unit 2 until the NRC decides its actions on the Friends May 26, 2016 emergency petition, including completing a root cause analysis of the bolt degradation and providing a reasoned basis for assurances that the plant is safe to operate.

13. I strongly support the petition for a writ of mandamus filed by Clearwater with the Court regarding Indian Point.

I declare, under penalty of perjury, that the foregoing information is true, accurate, and correct.

Executed on this fifteenth day of June, 2016, in Chappaqua, New York.



William H. Flank

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

DECLARATION OF CATHERINE SKOPIC

I, Catherine Skopic, declare as follows:

1. I am a resident of New York City, New York State. I live at 140 West Broadway and have lived at this residence since April 1973, for 43 years. My daughter, Adora, born June 1991, lives here, too. As I am an artist, my art studio is part of our living space.

2. I am currently a member of Nuclear Information and Resource Service (“NIRS”), and have been a member for approximately 3 years. I joined NIRS because of the increasing danger of the Indian Point nuclear power plant just 25 miles north of New York City. I participated in NRC hearings about 7 years ago in an effort to close Indian Point.

3. Under the leadership of NIRS, a coalition of organizations that had been working to close Indian Point came together. NIRS provided guidance, research, and technical, up-to-date information on the status of the plant, problems that were occurring and safety violations breached.

I joined NIRS because of the urgent necessity of closing Indian Point for the safety of my daughter, our home, New York City and all of the north east region that would be affected were there to be an accident at Indian Point. There have been many minor accidents – each one raising questions about the safety of the plant, how it is being run, and potentially moving the plant closer to a major accident. NIRS has the resources to help us with this impending danger; and we are grateful, particularly as the NRC has responded with indifference to our safety concerns and worry about all the exemptions Indian Point has requested and been granted. Unless you have lived in the looming shadow of a dangerous nuclear power plant, it might be difficult to imagine the daily presence of this threat.

4. Our home is approximately 40 miles from Indian Point. I am a retired Art Educator, having taught on all levels, pre-K to undergraduate and graduate students at Long Island University, C.W. Post Campus. I am an artist, having my art in several museums, private collections and a painting in the International Archive of the National Museum of Women in the Arts. As a faith leader, I was founder and Chair for 5 years of the Environmental Task Force of the Congregation of Saint Saviour at the Cathedral Church of Saint John the Divine. As activist, I have worked with a range of environmental groups including Shut Down Indian Point Now, Indian Point Safe Energy Coalition, The People's Climate Movement New York, Food & Water Watch, 350nyc, New York City Friends of Clearwater, Interfaith Moral Action on Climate, Physicians for Social Responsibility, United for Action, Sierra Club, and WeACT.

5. My daughter and myself live here. Our health is good, and we would like it to stay that way, of course, for as long as possible. Many of my colleagues live within 10 miles of Indian Point and even more live within the 50 mile radius. Many members of the church to which I belong live within 25 miles of Indian Point.

6. My daughter's and my personal health will be seriously affected in the event that bolt degradation and damage at Indian Point causes a radiation leak from the plant. Indian Point's operation without adequate assurance that its bolts can continue to properly function poses a significant risk to my personal health and safety.

7. As I have lived here for the past 43 years - my daughter for 25 - we have an investment in our home. All my art, art materials, our books, and archived environmental work is here. We rely on the businesses in our community. We are supportive of our schools and not-for-profit organizations.

8. August 2013, I kayaked down the Hudson River from Beacon to New York City with the Two Row Wampum Renewal Campaign - about 200 people, both First Nations and non-native - in observance of the 400 year old Two Row Wampum treaty. I have since then, kayaked on the Hudson River. I have taken trips on the Clearwater Sloop up and down the Hudson River. I have participated in the Clearwater Festival at Croton-on-Hudson, a most beautiful area. Prior to these experiences, during the time I lived here - since 1968 - I hiked the mountains along the Hudson River, picnicked with friends and swam in lakes of the Bear

Mountain area. I have taken my water color paints and painted scenes along the lakes, streams and woods. I feel as though I could not fully exist without these woods, lakes and streams – and the Hudson River.

9. The restoration and vitality of the Hudson River are important to my quality of life. A nuclear accident at Indian Point could preclude the river's restoration, and permanently degrade its ecological, aesthetic and economic character. I enjoy visiting several marinas along the Hudson River that could not survive without the integrity or aesthetic appeal of the Hudson River. I value the recovery of the Hudson River fisheries and I enjoy the festivals celebrating the shad spawning season in the spring. On Governor's Island in New York City, studies are being made on bringing back oysters, which naturally filter water, in an effort to further clean up the river. All of the progress I have seen in restoring the Hudson River could be defeated by a nuclear accident at Indian Point.

10. About 7 years ago, I joined with other individuals and organizations in giving testimony at NRC hearings to close Indian Point and have done so in the years following. I joined the Two Row Wampum Renewal Campaign in 2013 to bring attention to the importance of the Hudson River and to what it has meant in our past 400-year history with native people, the Dutch and ourselves today. I continue to work to close Indian Point to protect our precious river and all the surrounding environments.

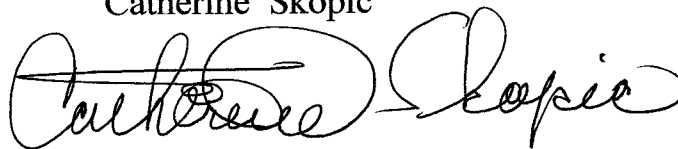
11. The restart of Indian Point without analysis of the root cause of the recently discovered baffle-former bolt degradation poses a significant risk to my personal health and safety and that of my daughter, our friends and colleagues, the value of our home and my interest in using and protecting the environment around Indian Point.

12. I authorize NIRS to file this petition on my behalf. I authorize NIRS on my behalf to request a Writ of Mandamus to prevent the restart of Indian Point Unit 2 until the NRC decides Friends May 26, 2016 emergency petition, including completing a root cause analysis of the bolt degradation and providing a reasoned basis for assurances that the plant is safe to operate.

13. I strongly support the petition for a writ of mandamus filed by NIRS with the Court regarding Indian Point.

I declare, under penalty of perjury, that the foregoing information is true, accurate, and correct. Executed on June 14, 2016 in New York, New York.

Catherine Skopic

A handwritten signature in black ink, appearing to read "Catherine Skopic". The signature is written in a cursive style with a large initial "C" and a long horizontal stroke across the middle.

CERTIFICATE OF SERVICE

I certify that on June 17, 2016, I served the foregoing upon all counsel registered with the Court's CM/ECF system.

Respectfully submitted,

/s/ John Bernetich

John Bernetich

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