

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY

_____))
In the Matter of))
Florida Power and Light Company) Docket Nos. 50-250, 50-251-SLR
Turkey Point Units 3 and 4))
_____))

DECLARATION OF LARRY E. BRAND, PH.D.

I, Larry E. Brand, Ph.D., being competent to provide this Declaration, declare as follows:

1. I am a marine biologist and ecologist with expertise in phytoplankton ecology, Harmful Algal Blooms and nutrients. I hold a Ph.D. in Biological Oceanography from the Woods Hole Oceanographic Institution/Massachusetts Institute of Technology Joint Program. I am a Professor of Marine Biology and Ecology at the Rosenstiel School of Marine and Atmospheric Science at the University of Miami. A copy of my curriculum vitae is attached.
2. I have been retained by Southern Alliance for Clean Energy, Tropic Audubon Society, and Friends of the Everglades as an expert witness in *Southern Alliance for Clean Energy, et al. v. Florida Power & Light Company*, No. 1:16-cv-23017-DPG in the United States District Court for the Southern District of Florida, Miami Division (“CWA Lawsuit”). In that lawsuit, the plaintiffs allege that Florida Power & Light Co. (“FPL”) has violated and is violating the federal Clean Water Act by discharging pollutants from the Turkey Point Units 3 and 4 nuclear reactors, including nutrients, hypersaline water and other chemical and radioactive contaminants, into waters of the United States in the Biscayne Bay and into the Biscayne Aquifer in violation of FPL’s CWA permit.
3. On May 14, 2018, I submitted an Expert Report in the CWA Lawsuit regarding nutrients being released from the cooling canal system (“CCS”) at the Turkey Point site into surrounding waters. I understand my Expert Report will be submitted in this proceeding. The facts in my Expert Report are true and correct to the best of my knowledge, and the opinions expressed in my Expert Report are based on my best professional judgment.

I declare under penalty of perjury under the laws of the United States that the foregoing is true to the best of my knowledge.



Larry Brand

Dated: 7-26-18