

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 E.J. WEXLER, P.ENG (Ontario)**

I, E.J. Wexler, P.Eng. (Ontario), being competent to provide this Declaration, declare as follows:

1. I am a hydrogeologist with expertise in groundwater modeling. I hold Masters’ Degrees in Civil Engineering and Earth Sciences and a B.E. in Civil Engineering. Since 2002, I have been Director of Modeling Services for Earthfix, Inc., where I lead a team of surface and groundwater modelers. 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 the adequacy of FPL’s groundwater models to predict the behavior of the body of hypersaline water introduced into the Biscayne Aquifer by the Turkey Point cooling canal system (“CCS”). 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.



E.J. Wexler

Dated: 7/25/2018