

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY

In the Matter of _____
Florida Power and Light Company _____
Turkey Point Units 3 and 4 _____

)
)
) Docket Nos. 50-250, 50-251-SLR
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)

DECLARATION OF BILL POWERS, P.E.

I, Bill Powers, P.E., being competent to provide this Declaration, declare as follows:

1. I am a mechanical engineer with expertise in energy and cooling systems and energy planning. I am a registered professional engineer in California. I hold a B.S. in mechanical engineering from Duke University and an M.S. in public health from the University of North Carolina. Since 1994 I have been principal of Powers Engineering, a consulting firm in San Diego, California. 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 in the circulating cooling water serving 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 feasibility of installing closed-cycle mechanical cooling towers as a replacement for the cooling canal system ("CCS") now used to cool the Turkey Point reactors. 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.

Bill Powers

Bill Powers

Dated: 6/28/18