

BEFORE THE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

\_\_\_\_\_  
In the Matter of )  
 )  
BALTIMORE GAS )  
& ELECTRIC CO., )  
et al., )  
 )  
(Calvert Cliffs Unit 1 and )  
Unit 2) )  
\_\_\_\_\_ )

Docket Nos. 50-317 and 50-318  
License Renewal  
  
ASLBP No. 98-749-01-LR

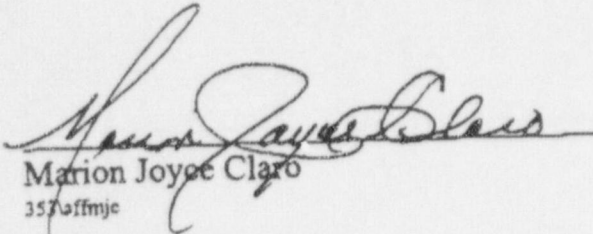
SECOND AFFIDAVIT OF MARION JOYCE CLARO

Under the pains and penalty of perjury I hereby affirm that the following is true and correct to the best of my knowledge and belief:

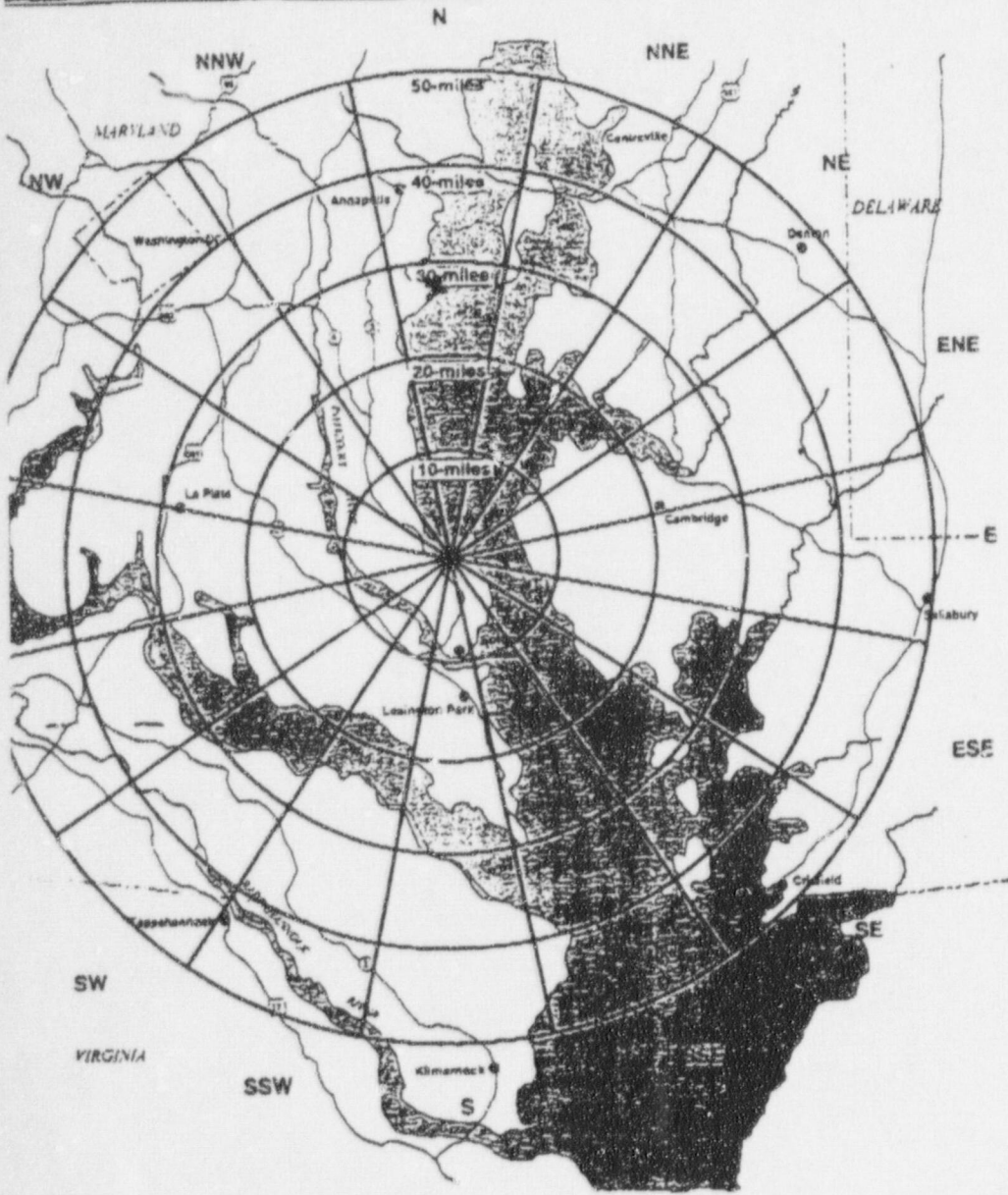
1. My name Marion Joyce Claro.
2. I am an employee and an officer of the National Whistleblower Center, a non-profit, tax exempt entity. On June 3, 1998 the Center's Board of Directors voted to create the position of "Management Officer" as an officer position within the corporation. At that meeting I was also voted to serve as the Management Officer.
3. I own property and reside at 1216 Gwynne Avenue, Churchton, MD 20733. Said property is within 30 miles of Calvert Cliffs Units 1 & 2. In this regard, I have reviewed Figure 3-5 which Baltimore Gas & Electric submitted along with its application to renew the license for Calvert Cliffs. This Figure contains a map of the Calvert Cliffs area and identifies the number of miles various locations are from the nuclear plant. Attached as exhibit 1 to this affidavit is a copy of Figure 3-5. I have placed an "x" on the document. This "x" sets forth where I reside. As can be seen from Figure 3-5, I reside approximately 29 miles from Calvert Cliffs, and well within the thirty mile limit of the plant.

4. In my capacity as the Management Officer of the Center, I contacted Board of Director member Rev. William Yolton. I provided Mr. Yolton with a copy of Figure 3-5. Rev. Yolton placed an "\*" on Figure 3-5 and faxed the document back to me. I then called Rev. Yolton and confirmed the accuracy of the fax. Exhibit 2 to this affidavit is the fax I received from Rev. Yolton, with the "\*" marking on it. As can be seen from this exhibit, Rev. Yolton resides forty miles from the nuclear plant at issue.
5. As the Management Officer of the NWC, I have first hand knowledge of the activities of that organization. After reviewing Figure 3-5, I can confirm that almost all of the activities of the Center are conducted within the fifty mile radius of the nuclear plant. The two paid employees of the Center work, on a daily capacity, within the fifty mile radius. Volunteer attorneys for the Center work within the fifty mile radius of the nuclear plant. The NWC retains, on the average, 1-3 student interns. They conduct their work within the fifty mile radius. Many of the Center's clients work within the fifty mile radius. If the Calvert Cliffs nuclear plant had a major accident, all of the employees of the Center could die, the interns working with the Center may die, clients of the Center may die, attorneys who volunteer for the Center may die, a majority of the members of the Board of Directors may die and the ability of the Center to function would be destroyed.
6. In addition, the Center regularly interacts with the federal government and regularly seeks the government's assistance on behalf of employee whistleblowers. Should the Calvert Cliffs plant have a major accident, the organs of the central government vital to the protection of whistleblowers would be rendered inoperable. For example, the U.S. Department of Labor and the U.S. Congress reside within the fifty mile radius of Calvert Cliffs. That department has the responsibility of adjudicating nuclear and environmental whistleblower cases. Likewise, members of the NWC's Board of Directors have on many occasions testified before Congress and worked with staff members of Congress. Congress conducts very important oversight activities on behalf of whistleblowers. An accident at Calvert Cliffs could undermine or destroy these vital oversight functions, functions which are integral to the purposes of the NWC.
7. I have reviewed the corporate resolutions of the NWC. The NWC did officially vote to intervene in the Calvert Cliffs relicensing proceedings.

8. In my prior affidavit, I authorized, vested, conferred, granted and otherwise affirmed that the National Whistleblower Center could represent all of my interests pertaining to the Calvert Cliffs matter. Should the NWC not be permitted standing to represent my interests, I hereby request permission to represent my own interests before the NRC and proceed in this proceeding in my individual capacity.

  
Marion Joyce Claro  
357 affmjc

October 1, 1998  
Dated



LEGEND:  
 - - - - State line

Figure 3-5. CCNPP 50-mile population sectors.

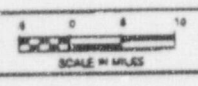


Exhibit 1

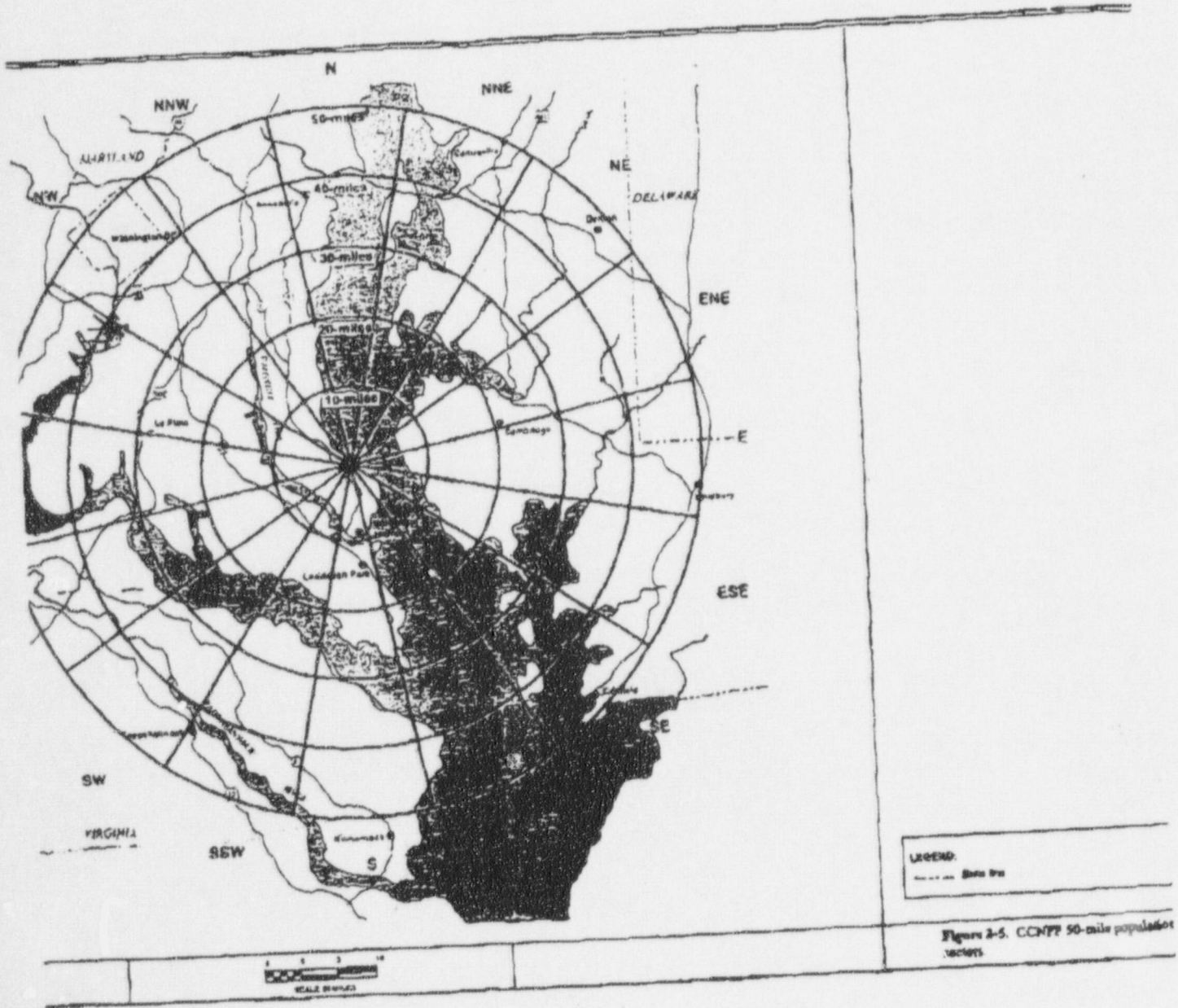


Figure 2-5. CONFF 50-mile population sectors.

Exhibit 2