

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

In the Matter of)
)
DUKE ENERGY CORPORATION)
) Docket Nos. 50-269-LR
Oconee Nuclear Station,) 50-270-LR
Unit Nos. 1, 2, and 3) 50-287-LR

DECLARATION of WILLIAM STEVEN LESAN

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

1. My name is William Steven ("W. S.") Lesan.
2. I own property and reside at 190 Daffodil Hill, Mountain Rest, South Carolina 29664. Said property is within 20 miles of Oconee Nuclear Station Units 1, 2 and 3.
3. I am a member in good standing of the Chattooga River Watershed Coalition, Inc. (CRWC), and I volunteer my services to contribute the CRWC's mission "To protect, promote and restore the natural ecological integrity of the Chattooga River watershed ecosystem; to ensure the viability of native species in harmony with the need for a healthy human environment; and, to educate and empower communities to practice good stewardship on public and private lands." In addition, I also volunteer my services to contribute to the CRWC's stated goals, two of which are directly applicable to these proceedings and are: "Educate the public," and "Promote public choice based on credible scientific information." I frequently visit the Chattooga River Watershed Coalition office, which is located in Clayton, Georgia, and is within 30 miles of the Oconee Nuclear Station.
4. My family and I live, work, recreate and travel to areas within 20 miles of Oconee Nuclear Station Units 1, 2 and 3. We also breathe the air, drink water and eat food produced within 20 miles of Oconee Nuclear Station Units 1, 2 and 3. Our food sources, air and water would be adversely affected by normal and accidental releases of radioactive materials during the proposed extended operation of the Oconee Nuclear Station Units 1, 2 and 3.
5. I believe that significant issues remain unresolved to the public, the Nuclear Regulatory Commission (NRC), and Duke Power Company, in Duke's application to renew the operating license for Oconee Nuclear Station Units 1, 2 and 3. Thus, the application is inadequate to protect me and my family from the unacceptable risk of a radiological accident at the facility during the proposed renewal term. My concern is based on my knowledge that the Nuclear Regulatory Commission staff has responded to Duke Power's application by requesting additional information concerning the structural integrity of the reactor vessel and containment buildings, and other critical components of the facility which are pivotal in determining whether the facility can be safely operated now, and through the extended renewal term for Oconee Nuclear Station Units 1, 2 and 3. In addition, to my knowledge there are other significant issues that are unresolved in Duke Power Company's application to renew the operating license for Oconee Nuclear Station Units 1, 2 and 3, specifically: the effects of aging and embrittlement of the Oconee Nuclear Station's reactor vessels and containment vessels; the status and capacity of the current storage facility for spent fuel and other radioactive substances on the site of the Oconee Nuclear Station; the potential need to design and expand aforementioned storage facilities to accommodate extended operation of Units 1, 2 and 3 of the Oconee Nuclear Station; transport of radioactive materials to other locations if and when storage capacity is exceeded; the real and potential availability and viability of other storage sites; specific safeguards to detect terrorist actions, and plans and measures to defend against terrorist attacks; and, the structural integrity of Units 1, 2 and 3 of the Oconee Nuclear Station to withstand tornadoes, and earthquakes of the magnitude possible due to the nuclear station's proximity to the Brevard Fault. In addition, I believe that the

