

August 28, 2020

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

\_\_\_\_\_) )  
In the Matter of ) )  
NextEra Energy Seabrook, LLC ) Docket No. 50-443  
(Seabrook Station, Unit 1) ) )  
\_\_\_\_\_)

**DECLARATION BY VICTOR E. SAOUMA, PH.D IN SUPPORT OF  
C-10 RESEARCH AND EDUCATION FOUNDATION'S  
MOTION TO RE-OPEN THE RECORD**

Under penalty of perjury, I, Dr. Victor E. Saouma, depose and say:

1. My name is Victor E. Saouma, and I am an expert witness for C-10 Research and Education Foundation (“C-10”) in this proceeding. My expert qualifications to make this declaration and to testify as an expert witness on the subject of alkali silica reaction (ASR) at the Seabrook nuclear power plant are established in LBP-20-09, the Atomic Safety and Licensing Board’s (ASLB’s) Initial Decision (Ruling on the Reformulated Contention) at 50 (Aug. 21, 2020).
2. The purpose of my declaration is to support C-10’s Motion to Re-open the Record of this proceeding for the purpose of considering my Supplemental Testimony regarding LBP-20-09. Supplemental Testimony of Victor E. Saouma, Ph.D Regarding License Conditions in LBP-20-09 (Aug. 28, 2020) (Ex. INT052 (Proprietary)).
3. My Supplemental Testimony discusses the four License Conditions imposed by the ASLB for the purpose of providing reasonable assurance of safe operation of the Seabrook reactor through its renewed license term, *i.e.*, until 2050. In my expert opinion, the License Conditions do not go far enough to compensate for deficiencies in the ASR monitoring program presented in NextEra Energy Seabrook, LLC’s (NextEra’s) License Amendment Request (LAR). The License Conditions are also inconsistent with LBP-20-09 to the extent that they give NextEra an unwarranted and unnecessary amount of discretion in interpreting the results of the monitoring program. Therefore, with respect to each of the four license conditions, I have proposed additional language to strengthen them. A copy of my Supplemental Testimony is attached, and hereby incorporated by reference into my Declaration.
4. While I am not an expert on NRC procedural regulations, in my opinion C-10’s motion is timely because it is being filed within ten days of the issuance of LBP-20-09, as generally required by 10 C.F.R. § 2.323(b) with respect to motions to the NRC.

5. In my expert opinion, C-10's Motion to Re-open the Record addresses a significant safety issue, because it proffers my Supplemental Testimony, which (a) explains the reasons the four license conditions currently are inadequate to protect public health and safety as required by the Atomic Energy Act and NRC regulations and also inconsistent with the ASLB's general reasoning in LBP-20-09, and (b) proposes language that would strengthen the License Conditions. In my expert testimony, the changes are essential to provide a reasonable assurance of adequate protection to public health and safety and maintain the internal conceptual consistency of LBP-20-09.
  
6. If the ASLB considers and adopts my proposed revisions to the License Conditions, the result of this proceeding will be materially different because deficiencies in the License Conditions' measures for protecting public health and safety will be substantially rectified.

I declare that the foregoing facts are true and correct to the best of my knowledge and that the expressions of opinion are based on my best professional judgment.

Executed in Accord with 10 C.F.R. § 2.304(d)

Victor E. Saouma, Ph.D

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