

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**BEFORE THE ATOMIC SAFETY AND LICENSING BOARD**

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**In the Matter of**

**South Texas Project Nuclear Operating Co.**

**Application for the South Texas Project**

**Docket Nos. 52-012, 52-013**

**Units 3 and 4**

**August 11, 2011**

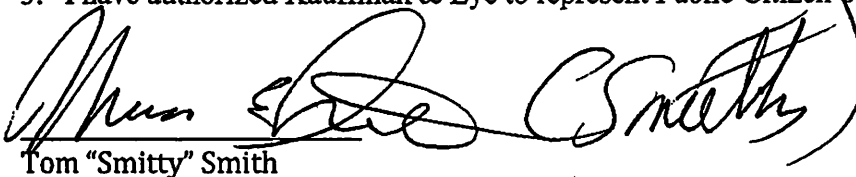
**Combined Operating License**

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**DECLARATION OF STANDING**

Under penalty of perjury, Tom "Smitty" Smith declares as follows:

1. My name is Tom "Smitty" Smith. I am the Executive Director of Public Citizen Texas. A Public Citizen Texas member, Bill Wagner, has previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. Bill Wagner lives within fifty (50) miles of the South Texas 3 & 4 site.
2. Mr. Wagner authorized Public Citizen Texas to represent his interests regarding issuance of the Combined License to the Applicant in this docket. Public Citizen Texas continues to represent the interests of Mr. Wagner in this docket. There has been no substantial change in our organization's status or its standing regarding its participation in this proceeding. Moreover, there has been no material change in the factual bases upon which Mr. Wagner's standing was based, including, without limitation, the proximity of his residence to the South Texas 3 & 4 site.
3. I have authorized Kauffman & Eye to represent Public Citizen's interests in this proceeding.

  
Tom "Smitty" Smith

8/11/2011  
Date

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**DECLARATION OF STANDING**

Under penalty of perjury, Karen Hadden declares as follows:

1. My name is Karen Hadden. I am the Executive Director of the SEED Coalition. A SEED Coalition member, Susan Dancer, has previously filed a declaration (the "Standing Declaration") in this Combined License proceeding. Ms. Dancer lives within fifty (50) miles of the South Texas Project Units 3 & 4.
2. Ms. Dancer authorized SEED Coalition to represent her interests regarding issuance of the Combined License to the Applicant in this docket. SEED Coalition continues to represent the interests of Ms. Dancer in this docket. There has been no substantial change in our organization's status or its standing regarding its participation in this proceeding. Moreover, there has been no material change in the factual bases upon which Ms. Dancer's standing was based, including, without limitation, the proximity of her residence to the South Texas Project Units 3 & 4.
3. I have authorized Kauffman & Eye to represent SEED Coalition's interests in this proceeding.

  
Karen Hadden

August 11, 2011

Date