

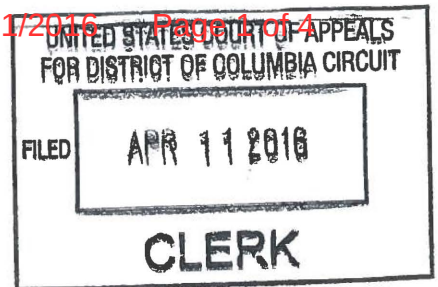
UNITED STATES COURT OF APPEALS  
FOR DISTRICT OF COLUMBIA CIRCUIT

APR 11 2016

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UNITED STATES COURT OF APPEALS  
DISTRICT OF COLUMBIA CIRCUIT33 Constitution Avenue, NW  
Washington, DC 20001-2866

Phone: 202-216-7000 | Facsimile: 202-219-8530

Sustainable Energy and Economic  
Development Coalition, Public Citizen,  
Susan Dancer,

Petitioners,

v.

Case No. 16-1108United States Nuclear Regulatory Commission,  
Respondent.

ORIGINAL

PETITION FOR REVIEW

Pursuant to 42 U.S.C. 2239, 28 U.S.C 2344, 5 U.S.C. 702, Fed. R. App 15(a) and D.C. Rule 15(a) Sustainable Energy and Economic Development Coalition, Public Citizen and Susan Dancer hereby, through undersigned counsel, petition the court for review of the U.S. Nuclear Regulatory Commission order CLI-15-07, 81 NRC 481 (attached), that ruled the Petitioners' contentions related to the application of the Atomic Energy Act, 42 U.S.C. 2133(d), were properly denied by the Atomic Safety and Licensing Board in LBP-14-3, 79 NRC 267 (2014). The Commission's order CLI 15-07 was entered April 14, 2015. Petitioners contend that order CLI-15-07, 81 NRC 481 violates the prohibition against foreign control or domination of a nuclear power plant project in violation of the Atomic Energy Act, 42 U.S.C. 2133(d).

The Petitioners also seek review of the issuance of the Combined License, South Texas Project Unit 3, Docket No. 52-012, effective February 12, 2016 (attached) and Combined License, South Texas Project Unit 4, Docket No. 52-013, effective February 12, 2016 (attached). Petitioners contend the licensing process that yielded the two combined licenses violate the prohibition against foreign control or domination of a nuclear power plant project in violation of the Atomic Energy Act, 42 U.S.C. 2133(d).

A copy of the Federal Register notice related to the licenses for South Texas Project Unit 3, Docket No. 52-012 and South Texas Project Unit 4, Docket No. 52-013 is attached.

Respectfully submitted,



Robert V. Eye, KS. Sup. Ct. No. 10689  
Robert V. Eye Law Office, LLC  
Suite 1010  
4840 Bob Billings Parkway  
Lawrence, Kansas 66049  
785-234-4040 Phone  
785-749-1202 Fax  
[bob@kauffmaneye.com](mailto:bob@kauffmaneye.com)  
(admission pending)

#### CERTIFICATE OF SERVICE

Undersigned hereby certifies that on April 11, 2016, a true and correct copy of the above and foregoing Petition for Review was mailed via United States Postal Service, return receipt requested to the following counsel:

Loretta E. Lynch, Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

U.S. Nuclear Regulatory Commission  
Margaret Doane, General Counsel  
Andrew Averbach, Solicitor  
Office of the General Counsel  
United States Nuclear Regulatory Commission  
Mail Stop: O-15D21  
Washington, DC 20555-0001

Annette L. Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16G4  
Washington, DC 20555-0001

Steven P. Frantz  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

  
Robert V. Eye

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Respondent.Case Number: 16-1108

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## CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure §26.1(a), the petitioners, Sustainable Energy and Economic Development Coalition (SEED), Public Citizen and Susan Dancer hereby state by and through undersigned counsel that none of the petitioners are a corporation as defined by Rule 26.1(a). SEED and Public Citizen are nonprofit public interest organizations. Neither has a parent company and no publicly-traded company has a ten percent or greater ownership interest in either SEED or Public Citizen. Seed nor Public Citizen is traded for profit.

Respectfully submitted,



Robert V. Eye, KS. Sup. Ct. No. 10689

Robert V. Eye Law Office, LLC

Suite 1010

4840 Bob Billings Parkway

Lawrence, Kansas 66049

785-234-4040 Phone

785-749-1202 Fax

[bob@kauffmaneye.com](mailto:bob@kauffmaneye.com)

(admission pending)

Date: April 11, 2016