

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE COMMISSION

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

**NOTICE OF APPEARANCE FOR DIANE CURRAN AND REQUEST FOR  
ACCESS TO ELECTRONIC HEARING DOCKET FOR ADJUDICATORY  
SUBMISSIONS CONTAINING PROPRIETARY INFORMATION**

Pursuant to 10 C.F.R. § 2.314(b), Diane Curran hereby enters an appearance in this proceeding as duly authorized legal counsel for C-10 Research and Education Fund. Undersigned counsel is a member in good standing of the bars of the District of Columbia; the State of Maryland; the U.S. District Court for the District of Columbia; the U.S. Supreme Court; and the U.S. Courts of Appeals for the D.C., First, Third, Ninth, and Tenth Circuits.

Undersigned counsel also has signed a Nondisclosure Declaration in this proceeding, giving her permission to receive and submit documents containing proprietary information. *See* attached Nondisclosure Declaration and cover letter. Therefore, counsel requests access to the NRC's Adjudicatory Submissions portal for submitting and receiving proprietary documents.

Respectfully submitted,  
          /signed electronically by/          

Diane Curran  
Harmon, Curran, Spielberg, & Eisenberg, L.L.P.  
1725 DeSales Street N.W., Suite 500  
Washington, D.C. 20036  
240-393-9285  
[dcurran@harmoncurran.com](mailto:dcurran@harmoncurran.com)

February 11, 2019



*Via electronic submission*

TO: Paul M. Bessette - Morgan Lewis  
Anita Ghosh Naber - U.S. Nuclear Regulatory Commission, Office of the General Counsel  
CC: Jeremy Wachutka and Sabrina Allen - NRC; Scott Clausen & Grant Eskelsen - Morgan Lewis;  
Chris Nord and Diane Teed - C-10 Board of Directors  
FROM: Natalie H. Treat, Executive Director, C-10 Research & Education Foundation  
DATE: January 8, 2019

RE: **Signed Non-Disclosure Affidavit of Diane Curran, Consulting Attorney to C-10 in the matter of:  
NEXTERA ENERGY SEABROOK, LLC (Seabrook Station Unit 1) Docket No. 50-443-LA-2**

Pursuant to 10 C.F.R. § 2.336, the C-10 Research and Education Foundation, Inc. ("C-10") hereby submits the following non-disclosure affidavit for Diane Curran, attorney with Harmon, Curran, Spielberg & Eisberg, LLP, 1725 DeSales Street NW, Suite 500 Washington, DC 20036.

Ms. Curran has entered into a limited agreement with C-10 as a consulting attorney. As such, she has completed the non-disclosure affidavit covering protected documents under NRC Docket No. 50-443-LA-2, regarding the license amendment request ("LAR") 16-03 from NextEra Energy Seabrook, LLC ("NextEra")<sup>1</sup> to adopt a methodology to monitor the impacts of alkali-silica reaction ("ASR") on concrete structures at Seabrook Station, Unit No. 1 ("Seabrook").

Ms. Curran has read and signed the Protective Order (Governing Non-Disclosure of Protected Information) issued by the Atomic Safety and Licensing Board on January 19, 2018. Her signed affidavit have been scanned and are attached as a pdf.

Respectfully Submitted on behalf of C-10,

Natalie Hildt Treat  
Executive Director  
C-10 Research & Education Foundation  
Ph: (978) 465-6646 Email: [natalie@c-10.org](mailto:natalie@c-10.org)

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<sup>1</sup> License Amendment Request 16-03, Revise Current Licensing Basis to Adopt a Methodology for the Analysis of Seismic Category I Structures with Concrete Affected by Alkali-Silica Reaction, (Aug. 1, 2016) (ADAMS Accession No. ML16216A240)

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

NEXTERA ENERGY SEABROOK, LLC

(Seabrook Station Unit 1)

Docket No. 50-443-LA-2

ASLBP No. 17-953-LA-BD01

DATE: January 8, 2019

**NON-DISCLOSURE AFFIDAVIT**

I, Diane Curran, being duly sworn, state:

1. I have read the January 19, 2018 Atomic Safety and Licensing Board Protective Order issued in this proceeding governing access to Protected Information and will comply in all respects with its terms and conditions regarding the Protected Information produced in connection therewith. I will protect and keep confidential all Protected Information in accordance with the terms of this Non-Disclosure Affidavit.
2. I will not disclose Protected Information to anyone except an authorized person. I will protect documents containing or revealing Protected Information in written or recorded form (including any portions of transcripts of in camera hearings, filed testimony, or any other documents that contain or reveal such Protected Information), so that the Protected Information contained therein remains at all times under the control of an authorized person and is not revealed to anyone else.
3. When not under my direct control or the direct control of another authorized person, I will securely maintain all documents containing or revealing Protected Information (including, without limitation, transcripts, pleadings that I may generate, and any notes and copies that I may make).
4. I will know that I am in possession of a document containing Protected Information because each document that contains or reveals Protected Information will be marked "Contains Proprietary Information – Subject to Protective Order."
5. Neither during nor after this proceeding will I publicly reveal any Protected Information that I receive in this proceeding.
6. I will return or destroy any Protected Information I acquired or generated during this proceeding as required by the Protective Order.

7. I acknowledge that any violation of the terms of this affidavit or the Licensing Board's Protective Order, which incorporates the terms of this affidavit, may result in the imposition of such sanctions on me that the Licensing Board or the Commission may deem to be appropriate. I also acknowledge that if I am involved in the actual or anticipated disclosure of Protected Information, or otherwise violate the terms of this affidavit or the Licensing Board's Protective Order, then the party that produced the information or another affected entity might pursue legal or equitable remedies against me personally.

WHEREFORE, I do solemnly agree to protect and keep confidential such Protected Information as may be disclosed to me in this proceeding, in accordance with the terms of this affidavit.

Name (printed): Diane Curran

Title: consulting attorney to C-10

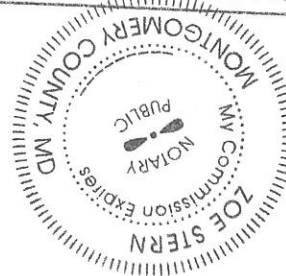
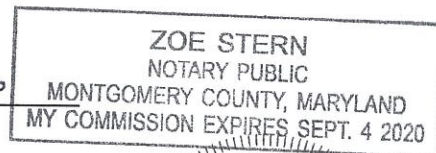
Signature: [Signature]

Date: Jan. 8, 2019

Subscribed to and sworn before me this 8<sup>th</sup> day of January 2019

Notary Public [Signature]

My commission expires: 9-4-2020



UNITED STATES OF AMERICA  
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NextEra Energy Seabrook, LLC	)	Docket No. 50-443
(Seabrook Station, Unit 1)	)	
_____	)	

**CERTIFICATE OF SERVICE**

I certify that on February 11, 2019, NOTICE OF APPEARANCE FOR DIANE CURRAN AND REQUEST FOR ACCESS TO ELECTRONIC HEARING DOCKET FOR ADJUDICATORY SUBMISSIONS CONTAINING PROPRIETARY INFORMATION and ATTACHED NONDISCLOSURE DECLARATION AND CORRESPONDENCE were posted on the NRC's electronic hearing docket.

\_\_\_\_\_/signed electronically by/\_\_\_\_

Diane Curran