

UNITED STATES OF AMERICA  
BEFORE THE NUCLEAR REGULATORY COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	Docket No. 50-0219-LR
AMERGEN ENERGY COMPANY, LLC	)	
	)	ASLB No. 06-844-01-LR
(License Renewal for the Oyster Creek	)	
Nuclear Generating Station)	)	May 5, 2006
	)	

**CERTIFICATION OF RICHARD WEBSTER IN SUPPORT OF CITIZENS’  
RESPONSE TO AMERGENS’ MOTION TO DISMISS, CITIZENS’ MOTION TO  
APPLY SUBPART G PROCEDURES, AND CITIZENS’ MOTION TO COMPEL**

I Richard Webster, Esq., being of full age, hereby certify that:

1. I represent a coalition of Citizens’ groups in this proceeding. I have consulted with AmerGen and NRC Staff in an attempt to avoid the need to file the accompanying motions. AmerGen objects to both Motions. NRC Staff has not yet taken a position on the Motion to compel, but does not support the Motion for Subpart G procedures and intends to file a written response to that Motion.
2. The document attached as Exhibit A to the Motion for Subpart G procedures (“Subpart G Motion”), Complaint in State of Illinois v. Exelon Corp., Docket No. 06 MR 248 (Ill., 12th Cir. Mar. 16, 2006), is a true and correct copy.
3. The document attached as Exhibit B to the Subpart G Motion, Illinois EPA, “Exelon Braidwood Nuclear Facility Tritium Releases and Groundwater Impacts,” Fact Sheet 1 (Feb. 2006), is a true and correct copy.
4. The document attached as Exhibit C to the Subpart G Motion, Hal Dardick, “Exelon Sued Over Leaks: Will County, State Alleges 8 Tritium Spills,” Chicago Tribune (Mar. 17, 2006), is a true and correct copy.
5. The document attached as Exhibit D to the Subpart G Motion, Hal Dardick, “Leaks Costly, Exelon Says: Tritium Spills Create Credibility Problem, Leader Says,” Chicago Tribune (April 26, 2006), is a true and correct copy.
6. The document attached as Exhibit E to the Subpart G Motion, Letter from Cynthia D. Pederson, NRC, to Christopher Crane, Exelon, dated Feb. 28, 2005, “Quad Cities Nuclear Power Station Non-Cited Violation [NRC Office of Investigations Report No. 3-2004-011],” is a true and correct copy.

7. The document attached as Exhibit F to the Subpart G Motion, Electronic Mail from Alex Polonsky to Richard Webster, "Oyster Creek," Mar. 23, 2006, is a true and correct copy.
8. The document attached as Exhibit G to the Subpart G Motion, Electronic Mail from Paul Gunther to Jhansi Kandasamy, "Oyster Creek Drywell Liner Corrosion Monitoring Program," Sept. 6, 2005, is a true and correct copy.
9. The document attached as Exhibit H to the Subpart G Motion, Electronic Mail from Peter C. Resler to Paul Gunther, "Response to 9/6 Request for Information," Oct. 10, 2005, is a true and correct copy.
10. The document attached as Exhibit I to the Subpart G Motion, Electronic Mail from George Beck to Donnie Ashley, et al., "Audit Q&A (Question Numbers AMP-141, 210, 356)," Apr. 5, 2006, is a true and correct copy.
11. The document attached as Exhibit J to the Subpart G Motion, and Exhibit RM 1 to the Response to Amergen's Motion to Dismiss, Memorandum by Rudolf H. Hausler, "Oyster Creek Dry Well Corrosion – Comments Regarding "Audit Q & A (Question Numbers AMP – 141, 210, 356) dated 4/5/06, Ref. ML060960563," May 3, 2006, is a true and correct copy. In addition, the attachment to Dr. Hausler's memorandum, provided in Exhibit RM 1, is a true and correct copy of Amergen's response to NRC audit questions, dated April 5, 2005, ADAMS accession number ML060960563.
12. The document attached as Exhibit K to the Subpart G Motion, Alexandra Marks, "Should Oldest US Nuke Plant Stay On Line?," Christian Science Monitor, (Apr. 19, 2006), is a true and correct copy.
13. The document attached as Exhibit L to the Subpart G Motion, Nuclear Security Coalition, "Report's Highlights: Safety and Security of Commercial Spent Nuclear Fuel Storage Public Report," National Academy of Sciences, Apr. 2005, is a true and correct copy.
14. The document attached as Exhibit M to the Subpart G Motion, Oyster Creek Public Relations Document, "Used Fuel Security Fact Sheet," is a true and correct copy.
15. The document attached as Exhibit N to the Subpart G Motion, Letter from Jill Lipoti, Ph.D. State of New Jersey Division of Environmental Safety and Health, to Hubert Miller, NRC "Effects of Aircraft Impact on Spent Fuel Pools in New Jersey," July 30, 2004, is a true and correct copy.
16. The document attached as Exhibit O to the Subpart G Motion is a true and correct copy of an excerpt of Safety and Security of Commercial Spent Nuclear Fuel Storage Public Report," National Academy of Sciences, Apr. 2005.

17. I caused to be sent the foregoing motions, response, and exhibits this 5th day of May, 2006 via email and U.S. Postal Service, as designated below, to each of the following:

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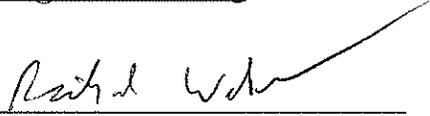
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Signed:

  
Richard Webster

Dated: May 5, 2006