

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE**

**OAK RIDGE ENVIRONMENTAL PEACE )  
ALLIANCE, NUCLEAR WATCH OF NEW )  
MEXICO, NATURAL RESOURCES DEFENSE )  
COUNCIL, RALPH HUTCHISON, ED SULLIVAN, )  
JACK CARL HOEFER, and LINDA EWALD, )**

**Plaintiffs,**

**v.**

**JAMES RICHARD PERRY, )  
Secretary, United States Department of Energy, )  
and LISA E. GORDON-HAGERTY, )  
Administrator, National Nuclear Security )  
Administration, )**

**Defendants.**

**No. 3:18-cv-00150  
REEVES/POPLIN**

**DECLARATION OF LINDA SUSAN EWALD**

## **DECLARATION OF LINDA SUSAN EWALD**

I, Linda Susan Ewald, hereby declare as follows:

1. I am a Plaintiff in this case. I am a member of Oak Ridge Environmental Peace Alliance's ("OREPA") Board of Directors and have been active with OREPA since the late 1980s. I am a resident of Knoxville, Tennessee, and my home is roughly 15 miles from the Y-12 Complex, well within the 50-mile radius that the National Nuclear Safety Administration ("NNSA") has recognized would be affected by the release of radiological materials from the Y-12 Complex. I regularly attend OREPA's events, and have been a regular attendee of OREPA's vigils at the Y-12 Complex entrance. As a member of OREPA's Board of Directors, I am responsible for contributing to decisions about OREPA's activities, including the scope and nature of comments on activities at Y-12.

2. I am profoundly concerned about existing contamination at the Y-12 Complex and about the risk of an earthquake causing a catastrophic nuclear accident at Y-12. I am particularly concerned about buried hazardous and nuclear waste at Y-12 causing groundwater contamination to which I and others may be exposed, especially in light of recurring discoveries of additional hazardous waste at the Complex. I am also deeply concerned about the risk of an earthquake causing a significant nuclear accident at Y-12, thereby killing or sickening local residents including myself, particularly in light of the aging nature of the buildings in the Complex and the fact that the area was recently revealed to have higher odds of a large earthquake than previously recognized. I am also concerned that such an event would reduce the value of my property.

3. The NNSA's refusal to prepare a new or Supplemental Environmental Impact Statement and the related violations of the National Environmental Policy Act ("NEPA")

detailed in Plaintiffs' First Amended and Supplemental Complaint and summary judgment motion harm my personal interests. I am harmed by the risk of a catastrophic collapse of aging buildings containing nuclear weaponry or components of nuclear weaponry, resulting in the release of nuclear or toxic materials, placing me and other local residents in extreme peril. I am harmed by the reduced ability of the federal government to conduct necessary cleanups of legacy contamination that has accumulated over the course of decades of nuclear weapon production at Y-12. I am harmed by the deprivation of environmental information and analysis which I am entitled to receive under NEPA, and denial of the opportunity for informed public participation that is a cornerstone of the NEPA process.

4. If the court issues a decision in Plaintiffs' favor and requires additional NEPA review, this will redress my injuries by requiring the NNSA to engage in further scrutiny, informed by public comment, of the environmental and public health harms posed by Y-12, and alternatives that could be pursued that would avoid or minimize those harms.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Linda Ewald

Linda Ewald

Date: Feb 13, 2019