NEC MOTION TO ADMIT NEW EVIDENCE ATTACHMENT FOUR VPSB 8300 March 10, 2016

Eyewitness Declaration and Oath of Clay Turnbull

While at the February 23, 2016 Vermont Public Service Board Technical Hearing, I heard Entergy Nuclear Vermont Yankee witness, Harry Dodson testify and emphatically repeat under cross examination that the proposed Independent Spent Fuel Storage Facility would not be visible from any offsite location except from the east bank (New Hampshire side) of the Connecticut River.

On February 26, 2016, I downloaded and carefully reviewed the transcript of the February 23, 2016 Technical Hearing with particular attention to the cross examination and Board inquiry responses of Mr. Dodson. As a result, my recollection of his testimony was affirmed.

By comparing notes with other New England Coalition members who had also visited the Vermont Yankee Nuclear Power Station site on numerous occasions including Public Service Board site visits, I found that I was confirmed in my belief that Mr. Dodson's testimony was grossly in error.

To be certain on February 27, 2016 and March 3, 2016, I traveled to Vernon, Vermont, to the periphery of the Entergy site for the purpose of testing Mr. Dodson's testimony. I was able to observe the present ISFSI and casks clearly and in bold relief from two vantage points: from the West-near the old switchyard on February 27, 2016 at a distance of about 400 yards, and from the North-near the release stack at a distance of about 140 yards. From the North vantage point I was able to see the approximate middle of the Connecticut River. Because I was approximately the same distance from the West bank of the river as the ISFSI and casks, I was able to deduce that the ISFSI and casks could be seen from the middle of the river as well. At no time in approaching the Vermont Yankee site did I knowingly cross any fence or fence-line or pass any apparent property marker or trespass warning placard.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 11, 2016 at Townsend, Vermont

Sincerely,

Clay Turnbull

Trustee

New England Coalition