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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

JANUARY WALKER,

Plaintiff,

v.

CHRIS WRIGHT, Secretary of Energy, in his official capacity; UNITED STATES
DEPARTMENT OF ENERGY; PETE HEGSETH, Secretary of Defense, in his
official capacity; UNITED STATES DEPARTMENT OF DEFENSE; VALAR
ATOMICS LLC; ISAIAH TAYLOR, Chief Executive Officer, Valar Atomics LLC,
Defendants.

Civil Action No. _____

**DECLARATION OF JANUARY WALKER IN SUPPORT OF PLAINTIFF'S
MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION**

20

21 DECLARATION OF JANUARY WALKER PURSUANT TO 28 U.S.C. § 1746

22

23 I, January Walker, declare under penalty of perjury pursuant to 28 U.S.C. § 1746
24 that the following is true and correct to the best of my knowledge and belief:

25

26 **I. PERSONAL BACKGROUND AND PROFESSIONAL QUALIFICATIONS**

27 1. I am the Plaintiff in this action. I am a citizen of the United States and a
28 resident of Salt Lake City, Salt Lake County, Utah. I have personal knowledge of
29 the facts set forth in this declaration and could competently testify to them if called
30 as a witness.

31 2. I am an eighth-generation Utah resident. My family has lived in Utah for
32 two centuries. My personal, familial, and ancestral connection to this basin is not
33 abstract. It is the land my family has inhabited across eight generations. Utah, The
34 Great Salt Lake, and its watershed are not a policy interest to me. They are home.

35 3. I am a Cybersecurity Executive and Planetary Information Security Officer
36 with extensive career experience in product lifecycle management, regulatory
37 compliance, and information security. I served as an Information Security Officer
38 at a major financial institution where my professional responsibilities included
39 identifying compliance gaps in complex system deployments, documenting those
40 gaps against applicable regulatory standards, and confirming resolution prior to
41 deployment authorization. My professional biography and credentials are
42 published at <https://orcid.org/0009-0000-6843-2051>.

43 4. My professional methodology requires full product lifecycle planning
44 across a system's complete operational life. When I applied that methodology to
45 the Ward 250 and the Holtec SMR-300 Pioneer Units application I identified that
46 no thermodynamic analysis of nuclear deployment consequences in the Great Salt
47 Lake basin and Colorado River watershed had ever been conducted by any federal
48 or state agency across the full physical liability period those reactors create.
49 Identifying that gap required no expertise in nuclear physics. It required the ability
50 to read a compliance document and identify what chapter was missing. The
51 chapter was missing.

52

53 **II. THE ADMINISTRATIVE RECORD I BUILT BEFORE FILING THIS**

54 **COMPLAINT**

55 5. On March 7, 2026, I submitted formal written correspondence to thirteen
56 federal agencies including DOE, DOD, NRC, EPA, USFWS, USACE, USGS, BLM,
57 USFS, CEQ, OMB, the State Department, and the Treasury Department. That
58 correspondence included my published thermodynamic analysis and a specific
59 quantified question asking each agency to identify what analysis existed on record
60 addressing the projected health of the Great Salt Lake at operational license end
61 and at 100, 300, and 1,000 years post-shutdown accounting for 8.97 gigawatts of
62 continuous waste heat into a terminal basin with no thermal exit pathway, the 43
63 percent probability of a Wasatch Fault magnitude 6.75 seismic event within 50
64 years, and simultaneous cooling water loss and radiological release into the
65 primary water supply of 80 percent of Utah's population. I asked who was liable

66 for the irreversible harm across the full decay timeline. A true and correct copy of
67 those submissions is attached as Exhibit CC.

68 6. The Utah Department of Environmental Quality responded to my
69 submissions in writing in March 2026. DEQ stated formally that no
70 thermodynamic analysis of nuclear deployment in Utah's water systems exists on
71 record and that DEQ is not required to produce one. DOE did not respond
72 substantively to any part of my question. No other federal agency produced the
73 analysis I requested. A true and correct copy of the DEQ response is attached as
74 Exhibit D.

75 7. Before any federal or state agency responded to my question I conducted
76 and published thermodynamic analysis addressing it myself. I published that
77 analysis on the CERN Zenodo open repository for public awareness on March 27,
78 2026 under the title *The Thermodynamic Effects of Nuclear Fission in the Great Salt Lake*
79 *Basin, Januarian Physics 2026, 1, 1.5*, DOI: 10.5281/zenodo.15001852. That analysis
80 is the only existing documented answer to the question I asked the government
81 and that the government declined to answer. A true and correct copy is attached
82 as Exhibit A.

83 8. On March 30, 2026, I submitted a draft Petition for Leave to Intervene and
84 Request for Adjudicatory Hearing in NRC Docket Nos. 50-616 and 50-617, the
85 Pioneer Units 1 and 2 Limited Work Authorization proceeding. That petition
86 presents twelve contentions sourced to the applicant's own documents in the NRC
87 ADAMS database. A formal adjudicatory petition is pending submission through
88 the NRC E-Filing system before the April 28, 2026 deadline. A true and correct
89 copy of the draft petition is attached as Exhibit B.

90 9. On April 3, 2026, I submitted a public comment to NRC Docket NRC-2026-
91 0265 entering my thermodynamic analysis into the administrative record of the
92 Pioneer Units proceeding. A true and correct copy is attached as Exhibit EE.

93 10. On April 3, 2026, I submitted a formal nine-contradiction reconciliation
94 demand to the DOE Office of Nuclear Energy documenting DOE's material
95 participation in Operation Gigawatt in direct contradiction of DOE's stated non-
96 participation. A true and correct copy is attached as Exhibit CC.

97 11. On April 3, 2026, I provided formal pre-litigation notice to Valar Atomics
98 LLC and Isaiah Taylor pursuant to Federal Rule of Civil Procedure 65(b) by email
99 to isaiah@valaratomics.com, muhammad@valaratomics.com,
100 mark@valaratomics.com, and max@valaratomics.com demanding halt of all fuel
101 insertion activities with a same-day response deadline. No confirmation of halt
102 was received. A true and correct copy of that notice and the email transmission
103 record is attached as Exhibit DD.

104
105 **III. MY SPECIFIC PERSONAL INJURY**

106 12. I reside in Salt Lake City, Utah within the Great Salt Lake terminal basin.
107 That basin is the commercial endpoint of the causation chain documented in the
108 Complaint. The Ward 250 DOE authorization baseline will flow into the
109 commercial licensing framework governing the Holtec SMR-300 deployment in
110 Brigham City, three miles from the Wasatch Fault, adjacent to the Great Salt Lake
111 terminal basin. That basin serves as the primary water supply for 80 percent of
112 Utah's population including me, my family, and my Bernese Mountain Dog, Epic.

113 13. The Great Salt Lake is already in crisis. It has lost approximately 73 percent
114 of its historic water volume. Its surface area has shrunk by more than half. Toxic
115 dust from the exposed lakebed already causes documented public health
116 consequences for residents of the Wasatch Front including me. The introduction
117 of 8.97 gigawatts of continuous waste heat into a terminal basin with no thermal
118 exit pathway that is already in ecological crisis is not a speculative future harm. It
119 is the documented thermodynamic consequence of a deployment whose safety
120 analysis has never been conducted by any government agency.

121 14. I am Pro-Physics, and consider products based on their merit. I am opposed
122 to nuclear deployment without the analysis which federal law requires and full
123 consideration and planning of the 24,110 year thermodynamic product lifecycle
124 which humanity will be responsible for. My published thermodynamic paper is
125 not advocacy against nuclear power. It is the answer to a question the government
126 was legally required to answer before making irreversible deployment decisions
127 and declined to answer. I answered it so that the public record would contain what
128 the government refused to produce.

129 15. I have exhausted every administrative channel available to me before filing
130 this complaint. I have attempted countless letters, calls, social media posts. I have
131 engaged every potentially connected agency. I have solicited key stakeholders. I
132 have submitted to thirteen federal agencies. I have entered the administrative
133 record of the Pioneer Units NRC proceeding. I have filed formal pre-litigation
134 notice. I have published the only existing thermodynamic analysis of the
135 consequences of this deployment for the watershed where my family has lived for
136 two centuries. The government has not answered my question. The Ward 250 is
137 targeting criticality on July 4, 2026. Fuel insertion is imminent. This Court is the

138 last forum where the law Congress enacted can be enforced before an irreversible
139 event occurs.

140

141 **IV. THE EMERGENCY BASIS FOR EX PARTE RELIEF**

142 16. The fuel insertion date for the Ward 250 has not been publicly disclosed by
143 Valar Atomics or DOE. I have no means of knowing how many days remain before
144 TRISO fuel is inserted into the Ward 250 reactor vessel. The DOE's own
145 documentation states that an on-site TRISO fuel fabrication facility was planned
146 for spring 2026. Fuel insertion may occur within days or weeks of the date of this
147 filing. I cannot know.

148 17. Once TRISO fuel is inserted into the Ward 250 reactor vessel a fueled
149 nuclear reactor will exist in the Colorado River watershed. That physical condition
150 cannot be reversed by any court order regardless of the outcome of this
151 proceeding. No monetary award can remove enriched uranium from a reactor
152 vessel in a public watershed. The harm from fuel insertion is irreversible by
153 definition.

154 18. I provided formal pre-litigation notice to Valar Atomics on April 3, 2026
155 with a same-day response deadline. No confirmation of halt was received. I have
156 no basis to believe Valar Atomics or DOE will voluntarily halt fuel insertion
157 activities pending this Court's review. The absence of any response to my pre-
158 litigation notice confirms that Defendants do not intend to voluntarily comply
159 with the legal requirements this complaint documents.

160 19. I respectfully request that this Court issue a temporary restraining order
161 immediately upon filing and order Defendants to disclose the planned fuel

162 insertion date within seventy-two hours of service so that this Court may assess
163 the full scope of the emergency before the first irreversible threshold is crossed.

164

165 **V. THE EXHIBITS ATTACHED TO THIS DECLARATION**

166 The following exhibits are attached to this declaration and are true and correct
167 copies of the documents described:

168

169 **Exhibit A.** Walker J. The Thermodynamic Effects of Nuclear Fission in the Great
170 Salt Lake Basin. *Januarian Physics* 2026, 1, 1.5. DOI: 10.5281/zenodo.15001852.
171 March 27, 2026. URL: <https://zenodo.org/records/15001852>

172 **Exhibit B.** Plaintiff Correspondence Packet. Contains: Plaintiff's formal letters to
173 all agencies and officials submitted March 7, 2026; all responses received
174 including Office of Nuclear Energy response March 26, 2026, Response
175 Department of Nuclear Energy, USGS Response April 1, 2026, and Utah DEQ
176 GRAMA response received March 19, 2026; and Plaintiff's DOE Nine-
177 Contradiction Reconciliation Demand dated April 3, 2026 and any response
178 received.

179 **Exhibit C.** Utah Department of Environmental Quality GRAMA & other
180 response to January Walker. Signed by Brenda L. Johnson, GRAMA Records
181 Officer. Received by Plaintiff March 19, 2026. DEQ does not possess any records

182 matching Plaintiff's request. DEQ conducted a reasonable search. Under Utah
183 Code Section 63G-2-201(8)(a) DEQ is not obligated to create new records.

184 **Exhibit D.** Walker J. Draft Petition for Leave to Intervene and Request for
185 Adjudicatory Hearing. In the Matter of SMR LLC Pioneer Units 1 and 2. Docket
186 Nos. 50-616 and 50-617. March 30, 2026.

187 **Exhibit E.** Walker J. Pre-Litigation Notice to Valar Atomics LLC and Isaiah
188 Taylor. April 3, 2026. Sent via email to isaiah@valaratomics.com,
189 muhammad@valaratomics.com, mark@valaratomics.com,
190 max@valaratomics.com. Includes email transmission record with timestamps.
191 No confirmation of halt received.

192 **Exhibit F.** Government Orders and Authorizations. Contains: Executive Order
193 14301, Reforming Nuclear Reactor Testing at the Department of Energy, May 23,
194 2025, 90 Fed. Reg. 24125; Executive Order 14300, Ordering the Reform of the
195 Nuclear Regulatory Commission, May 23, 2025; DOE-NRC Memorandum of
196 Understanding Addendum No. 9; DOE Categorical Exclusion, 91 Fed. Reg. 7736,
197 January 28, 2026, Docket DOE-HQ-2025-0405; NRC Proposed Rule, 91 Fed. Reg.
198 16584, April 2, 2026, Docket NRC-2025-1503.

199 **Exhibit G.** Twelve State Attorneys General. Formal Opposition to DOE
200 Categorical Exclusion. Docket DOE-HQ-2025-0405. California Attorney General
201 Rob Bonta lead. Filed before March 4, 2026 comment deadline.

202 **Exhibit H.** News Articles. Contains: Snyder R. The Trump Administration Has
203 Secretly Rewritten Nuclear Safety Rules. NPR. January 28, 2026. URL:
204 [https://www.npr.org/2026/01/28/nx-s1-5277599/nuclear-safety-rules-trump-
206 energy-department](https://www.npr.org/2026/01/28/nx-s1-5277599/nuclear-safety-rules-trump-
205 energy-department); Collier K and Ivory D. DOGE Goes Nuclear. ProPublica.
207 April 1, 2026. URL: [https://www.propublica.org/article/doge-nuclear-regulatory-
209 commission-silicon-valley-trump](https://www.propublica.org/article/doge-nuclear-regulatory-
208 commission-silicon-valley-trump); Allen M. Utah Must Protect Its Future
210 Families. Salt Lake Tribune. March 18, 2026. URL:
211 [https://www.sltrib.com/opinion/commentary/2026/03/18/voices-utah-should-be-
213 more-careful](https://www.sltrib.com/opinion/commentary/2026/03/18/voices-utah-should-be-
212 more-careful)

214 **Exhibit I.** State of Utah. Office of Energy Development. Operation Gigawatt:
215 Utah Nuclear Lifecycle Innovation Campus. DOE RFI Response. March 31, 2026.
216 Submitted by Emy Lesofski, Director of Utah Office of Energy Development and
217 Energy Advisor to Governor Cox. URL: [https://energy.utah.gov/wp-
220 content/uploads/1.-Utah-OED-Establishment-of-Nuclear-Lifecycle-Innovation-
221 Campus-DOE-RFI-Reponse_3.31_FINAL-compressed.pdf](https://energy.utah.gov/wp-
218 content/uploads/1.-Utah-OED-Establishment-of-Nuclear-Lifecycle-Innovation-
219 Campus-DOE-RFI-Reponse_3.31_FINAL-compressed.pdf)

217

218

219 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing
220 is true and correct to the best of my knowledge and belief.


221

222 Executed on April 7, 2026, in Salt Lake City, Utah.

223

224

225



/s/

226

January Walker

227

Planetary Information Security Officer

228

Plaintiff Pro Se

229

Salt Lake City, Utah

230

ORCID: 0009-0000-6843-2051

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<https://orcid.org/0009-0000-6843-2051>