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OFFICE OF THE  
GENERAL COUNSEL  
ADJUDICATING OFFICE

Chairman, Atomic Safety & Licensing Board, T3F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Re: Northeast Nuclear Energy Co. Docket #50-423-  
1a-3; ASLBP #00-771-01-LA

We are writing in opposition to the application by Northeast Nuclear to increase the capacity of the spent fuel storage pool of the Millstone Nuclear Power Station, Unit #3, New London, Conn.

This proposal should be prohibited because it is too great a risk to the public. The proposal will make the Millstone spent fuel pool a high level waste repository in direct violation of safety regulations. Moreover, the fuel pool was not designed for this purpose and enlarging it greatly increases the chances of an accident that could release long lived radioactive substances. It significantly would increase the probability of a critical accident in the spent fuel pool and the probability that the spent fuel pool water temperature will exceed the structural qualification temperature and reach the boiling point.

The risk of this proposal far outweighs the benefit. The NRC is required to ensure through its regulatory and licensing functions that the generation and transmission of nuclear power does not unreasonably threaten the public welfare. This increase in capacity through the addition of high-density storage racks of the spent fuel storage pool will unreasonably threaten the public welfare.

Please deny the application by Northeast Energy.

Sincerely,

Marianne C. Leonard  
Sean Connibell  
H/Son And