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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of:	:	**Docket No. 50-336**
	:	**Docket No. 50-423**
NORTHEAST NUCLEAR	:	
ENERGY COMPANY	:	
(Millstone Nuclear	:	
Power Station,	:	
Unit Nos. 2 and 3)	:	**SEPTEMBER 8, 2000**

CONNECTICUT COALITION AGAINST MILLSTONE AND STAR FOUNDATION PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING

The Connecticut Coalition Against Millstone ("CCAM") and STAR Foundation, pursuant to notice published in the Federal Register on August 9, 2000, herewith petition to intervene and request a hearing in the following proceedings:

Application by Northeast Nuclear Energy Company ("NNECO") on February 22, 2000 to amend Operating Licenses DPR-65 and NFP-49 "to relocate selected radiological effluent Technical Specifications and the associated Bases to the Millstone Radiological Effluent Monitoring and Offsite Dose Calculation Manual in accordance with the Nuclear Regulatory Commission's Generic letter 89-01."

Introduction

The Radiological Liquid and Gaseous Effluent Monitoring Instrumentation monitors routine radioactive releases from

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Millstone Units 2 and 3. The instrumentation provides a surveillance of potential release points and initiates automatic and trip functions which are intended to terminate the release prior to exceeding the limits of 10 CFR Part 20 (1993 version). (Statement of NNECO)

The license amendment under consideration will relocate selected radiological effluent Technical Specifications and the associated Bases to the Millstone Radiological Effluent Monitoring and Offsite Dose Calculation Manual. Should the amendment be granted, modifications to the instrumentation and surveillance mechanisms to monitor routine radioactive releases from Millstone Units 2 and 3 may thereby be effected without public notice and the opportunity for hearing.

Standing

The Connecticut Coalition Against Millstone is an organization consisting of multiple statewide organizations which advocate for safe and renewable energy sources and environmental protection. Its membership includes whistleblowers who have been fired for raising legitimate safety issues at Millstone. The Coalition's membership also includes families with young children who own property and reside within the five-mile priority emergency evacuation zone of the Millstone Nuclear Power Generating Station in Waterford, Connecticut. The Coalition is based at 13 Water Street, Mystic, Connecticut, within the 10-mile emergency evacuation zone.

STAR ("Standing for Truth About Radiation") Foundation is a non-for-profit organization based at 66 Newtown Lane in East Hampton, New York. Its membership includes families with young children who own property and reside within the 10-mile emergency evacuation zone of the Millstone reactors.

Should the amendment be granted, the membership of CCAM and STAR Foundation will suffer increased risk of hazard from radiological releases from Millstone Units 2 and 3 and consequent adverse health effects with no opportunity for comment or objection.

The risks are exacerbated by the fact that the Nuclear Regulatory Commission, at the request of licensees of commercial nuclear reactors, terminated its independent radiological monitoring program at Millstone and elsewhere two years ago. The only radiological monitoring at Millstone is carried out by the licensee,[1] which only one year ago pleaded guilty in the United States District Court to felonies involving falsification of information required to be filed with the NRC.

Recent scientific reports have raised credible issues of the relation between significant increases in thyroid cancers and blood disorders - known to be radiation-induced - in the population close to Millstone and the operations of Millstone. Until Millstone or the NRC can creditably discount such cancer rate increases, the NRC must not lower the bar to the release of radioactive fission by-products to the environment, and monitoring of such releases, keeping in mind that the environment closest to Millstone is a residential zone.

Contention

"Relocating" the selected radiological effluent Technical Specifications and the associated Bases to the Millstone Radiological Effluent Monitoring and Offsite Dose Calculation Manual will deprive the public, and the membership of the Connecticut Coalition Against Millstone and STAR Foundation, of notice of proposed changes to the Millstone radiological liquid and

[1] The State of Connecticut Department of Environmental Protection has a program of radiological monitoring which is so limited as to be of no consequence.

gaseous effluent monitoring instrumentation. It will deprive them of the opportunity for hearing and to comment and object to changes, which can only be projected to lower standards of radiological effluent monitoring in the era of deregulation and electric restructuring. The amendment request is particularly objectionable in light of the record levels of radiological effluent released to the environment by the Millstone reactors.

This amendment will degrade protection of the public health and safety from radiological effluents. Even according to the applicant, NNECO, the amendment opens the door to increases in the type and amounts of effluents that may be released offsite as well as individual and cumulative occupational radiation exposures. NNECO's amendment requests states that such increases will not be "significant." (Application, February 22, 2000, cover letter, page 3.) However, as there will be no opportunity for hearing or public comment, the public will be exposed to greater risk of radiation doses from the routine operations of the Millstone nuclear reactors if NNECO obtains the amendment requested. The Petitioners are prepared to establish through expert testimony that any increase in routine radiological effluent to the air and water by the Millstone nuclear reactors will expose the public to greater risk of cancer, immunodeficiency diseases and other adverse health effects.

Wherefore, the Connecticut Coalition Against and STAR Foundation petition to intervene in the above-referenced proceedings and requests a hearing.

THE PETITIONERS
CONNECTICUT
COALITION
AGAINST MILLSTONE
STAR FOUNDATION

By: _____

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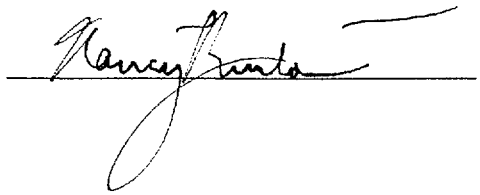
CERTIFICATE OF SERVICE

This is to certify that a copy of the **"CONNECTICUT COALITION AGAINST MILLSTONE AND STAR FOUNDATION PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING"** was emailed to the Office of the Secretary, U.S. Nuclear Regulatory Commission (HEARINGDOCKET@nrc.gov)and sent via U.S. Mail, postage pre-paid to the following on September 8, 2000:

Office of the Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington DC 20555

Office of Commission Appellate Jurisdiction
U.S. Nuclear Regulatory Commission
Washington DC 20555

Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington DC 20555

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