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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

NOV -1 P3:24

Before Administrative Judges:
Ann Marshall Young, Chair
Dr. Charles N. Kelber
Thomas S. Moore

Office of the
Administrative
Judges

In the Matter of : Docket Nos. 50-336-LA
: and 50-423-LA
NORTHEAST NUCLEAR :
ENERGY COMPANY :
: ASLBP No. 00-783-09-LA
(Millstone Nuclear Power Station,
Units 2 and 3) : October 27, 2000

**CONNECTICUT COALITION AGAINST MILLSTONE
AND STAR FOUNDATION AMENDED 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 Millstone Units 2 and 3. The instrumentation provides a surveillance of potential

Template = SECY-037

SECY-02

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. The Affidavit of Joseph H. Besade is attached hereto and incorporated herein.

STAR ("Standing for Truth About Radiation") Foundation is a non-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. The Affidavit of John Thatcher is attached hereto and incorporated herein.

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 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,

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.

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.

The Declaration of Joseph Mangano is attached hereto and incorporated herein.

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

**THE PETITIONERS
CONNECTICUT COALITION**

**AGAINST MILLSTONE
STAR FOUNDATION**

By: 
Nancy Burton, Esq.
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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before Administrative Judges:
Ann Marshall Young, Chair
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In the Matter of : **Docket Nos. 50-336-LA**
: **and 50-423-LA**

NORTHEAST NUCLEAR
ENERGY COMPANY :
: **ASLBP No. 00-783-09-LA**

(Millstone Nuclear Power Station,
Units 2 and 3) : **October 27, 2000**

DECLARATION OF JOSEPH MANGANO

1. I, Joseph Mangano, submit this declaration in support of the petition to intervene and for hearing filed on behalf of the Connecticut Coalition Against Millstone and STAR Foundation in this matter.
2. I am a research associate with the Radiation and Public Health Project in New York City. I am the author of numerous technical studies, books and reports related to radiation and health effects of radiation. A copy of my resume is attached hereto.
3. I am familiar with the application which is the subject of these proceedings.
4. The application seeks 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."
5. I am familiar with official reports of radiological effluent from the Millstone Nuclear Power Station as have been submitted by the licensee herein to governmental agencies.
6. I am familiar with the fact that the applicant herein pleaded guilty in the United States District Court for the District of Connecticut in September 25, 1999 to felonies under the Atomic Energy Act, including its submission of falsified records to the United States Nuclear Regulatory Commission, and to felonies under the Clean Water Act involving illegal discharges of toxins to the environment.

7. I am familiar with epidemiological records pertaining to the incidence of diseases in the region of the Millstone Nuclear Power Generating Station, which diseases are scientifically associated with radiological emissions from nuclear power generating plants such as Millstone.
8. The Millstone Nuclear Power Generating Station has released radiological effluent to the air during the operations of its three nuclear reactors at excessive levels, according to information compiled and released by the licensee herein.
9. The present application, if granted, will eliminate the opportunity for public notice, hearing and comment regarding changes to the Millstone radiological liquid and gaseous monitoring instrumentation.
10. Such instrumentation is critical in the prevention of radiological effluent releases to the environment and the monitoring of such releases
11. The surrounding community is a residential neighborhood with elementary schools and other facilities for young children who are especially vulnerable to adverse health consequences from exposure to Millstone radioactive emissions.
12. Although the Nuclear Regulatory Commission monitored radiation emissions from all commercial nuclear reactors following the Three Mile Island partial core meltdown accident in 1979, the NRC has eliminated independent monitoring within the past two years at the request of the nuclear industry and over the objection of public officials in the subject communities.
13. There is virtually no independent monitoring of Millstone radiological effluent releases carried out by the municipality of Waterford, Connecticut, nor the State of Connecticut.
14. The people of the State of Connecticut and Long Island are at risk of adverse health effects from radiological discharges by the Millstone reactors.
15. Standards of effluent monitoring instrumentation should be tightened, rather than loosened, given the abundance of scientific evidence which has developed linking radiological discharges from commercial nuclear reactors, including Millstone, to adverse health effects, since the present standards were adopted.
16. Should the present application be approved, it is virtually certain that standards of effluent monitoring instrumentation, as such exist, will be lessened without notice to the public or public representatives and with no opportunity for hearing or comment.
17. Should such be the case, the licensee herein will be permitted to further endanger the health and safety of its resident communities of Connecticut and Long Island without an opportunity to participate in the process.
18. My declaration is informed by several professional studies:

(a) An article "A Survey of Childhood Malignancies" by Alice Stewart et al., in the June 28, 1958 British medical Journal, which linked low-level radiation exposure with increased risk of cancer death.

(b) An article "Prenatal X-ray Exposure and Childhood Cancer" by Brian MacMahon, in the May 1962 Journal of the National Cancer Institute, which corroborated Alice Stewart's findings.

(c) Testimony to Senate Subcommittee on Labor, health and Human Services and Education, Appropriations Committee, by Richard D. Klausner, director of the National Cancer Institute, October 1, 1997, estimating that exposure to low levels of fallout (radioactive iodine) from Nevada nuclear weapons tests resulted in up to 75,000 additional cases of thyroid cancer in the U.S.

(d) A report "Estimated Exposures and Thyroid Doses Received by the American People from Iodine-131 in Fallout Following Nevada Atmospheric Nuclear Bomb tests," from the National Cancer Institute, October 1997, which provides the factual evidence for Klausner's estimates in (c).

I hereby declare that the statements presented herein are true to the best of my knowledge, information and belief, under penalty of perjury.

Joseph Mangano

JOSEPH J. MANGANO, MPH, MBA
786 CARROLL ST. #9
BROOKLYN, NY 11215

718-857-9825

RESEARCH ASSOCIATE, RADIATION AND PUBLIC HEALTH
PROJECT, NEW YORK CITY, 1989-PRESENT

BOOKS:

Author, *Low-Level Radiation and Immune System Damage: An Atomic Era Legacy*. CRC Press/Lewis, 1998.

Co-author, *The Enemy Within*. Four Walls Eight Windows, 1996.

Acknowledged in *Deadly Deceit*. Four Walls Eight Windows, 1990.

the United States District Court for the District of Connecticut in September 23, 1989 to felonies under the Atomic Energy Act, including its submission of falsified records to the United States Nuclear Regulatory Commission, and to felonies under the Clean Water Act involving illegal discharges of toxins to the environment.

7. I am familiar with epidemiological records pertaining to the incidence of diseases in the region of the Millstone Nuclear Power Generating Station, which diseases are scientifically associated with radiological emissions from nuclear power generating plants such as Millstone.

8. The Millstone Nuclear Power Generating Station has released radiological effluent to the air during the operations of its three nuclear reactors at excessive levels, according to information compiled and released by the licensee herein.

9. The present application, if granted, will eliminate the opportunity for public notice, hearing and comment regarding changes to the Millstone radiological liquid and gaseous monitoring instrumentation.

10. Such instrumentation is critical in the prevention of radiological effluent releases to the environment and the monitoring of such releases.

11. The surrounding community is a residential neighborhood with elementary schools and other facilities for young children who are especially vulnerable to adverse health consequences from exposure to Millstone radioactive emissions.

12. Although the Nuclear Regulatory Commission monitored radiation emissions from all commercial nuclear reactors following the Three Mile Island partial core meltdown accident in 1979, the NRC has eliminated independent monitoring within the past two years at the request of the nuclear industry and over the objection of public officials in the subject communities.

13. There is virtually no independent monitoring of Millstone radiological effluent releases carried out by the municipality of Waterford, Connecticut, nor the State of Connecticut.

14. The people of the State of Connecticut and Long Island are at risk of adverse health effects from radiological discharges by the Millstone reactors.

15. Standards of effluent monitoring instrumentation should be tightened, rather than loosened, given the abundance of scientific evidence which has developed linking radiological discharges from commercial nuclear reactors, including Millstone, to adverse health effects, since the present standards were adopted.

16. Should the present application be approved, it is virtually certain that standards of effluent monitoring instrumentation, as such exist, will be lessened without notice to the public or public representatives and with no opportunity for hearing or comment.

17. Should such be the case, the licensee herein will be permitted to further endanger the health and safety of its resident communities of Connecticut and Long Island without an opportunity to participate in the process.

18. [Join anything else you'd like to add]

I hereby declare that the statements presented herein are true to the best of my knowledge, information and belief, under penalty of perjury.

Joseph J. Mangano

MEDICAL JOURNAL ARTICLES (author or co-author):

"Strontium-90 in Baby Teeth as a Factor in Early Childhood Cancer," *International Journal of Health Services*, Summer 2000.

"Cancer in Baseball Players: A New Outbreak?" *Pesticides, People, and Nature*, Summer 2000 (in press).

"Strontium-90 in Newborns and Childhood Disease," *Archives of Environmental Health*, Summer 2000.

"Improvements in Local Infant Health After Nuclear Power Reactor Closing," *Journal of Environmental Epidemiology and Toxicology*, Spring 2000.

"The Strontium-90 Baby Teeth Study and Childhood Cancer," *European Journal of Oncology*, Summer 2000 (in press).

"A Rise in the Incidence of Childhood Cancer in the U.S.," *International Journal of Health Services*, Spring 1999.

"A Post-Chernobyl Rise in Thyroid Cancer in Connecticut," *European Journal of Cancer Prevention*, 2/96.

"Cancer Mortality Near Oak Ridge, Tennessee," *International Journal of Health Services*, Summer 1994.

OTHER JOURNAL ARTICLES

"Nuclear Power Play," *The Nation*, April 10, 2000.

LETTERS TO MEDICAL JOURNALS:

"Declines in Elderly Cancer Deaths After Nuclear Reactor Closing," *British Medical Journal*, Spring 2000 (under review).

"Answering the Challenge," (response to Sen. Pete Domenici), *Bulletin of the Atomic Scientists*, 7/98.

"Low-Level Radiation Harmed Humans Near Three Mile Island," *Environmental Health Perspectives*, 8/97.

"Childhood Leukaemia in U.S. May Have Risen Due to Fallout From Chernobyl," *BMJ*, 4/19/97.

"Chernobyl and Hypothyroidism," *Lancet*, 5/25/96 and 8/17/96 (response to comment).

"Thyroid Cancer in the United States Since Accident at Chernobyl," *BMJ*, 8/19/95.

LETTERS TO NEWSPAPERS:

"Radiation as Carcinogen," *New York Times*, 10/3/97.

"Why Was Government Silent on Bomb Tests?" *New York Times*, 8/3/97.

"Potassium Iodide Is No Protection from Fallout," *New York Times*, 4/10/96.

TELEVISION STORIES:

"Nuclear Nightmare?" WTNH, New Haven CT, 4/30/99.

"Future Fallout." WIXT, Syracuse NY, 11/25-26/98 (3 parts).

"Thyroid Cancer in Connecticut After Chernobyl." WABC, New York NY, 4/26/96.

"Cancer Study." WATE, Knoxville TN, 7/22/94.

CONFERENCE PROCEEDINGS:

"Chernobyl Emissions Linked to a Variety of Adverse Health Effects in the U.S." In *Effects of Low Dose Ionizing Radiation: Muenster 1998*.

"Low Level Radiation and Carcinoma of the Thyroid." In *100 Jahre Roentgen: Berlin 1995*.

EDUCATION:

MBA, Management, Fordham University, New York, NY, 1985.

MPH, Health Administration, University of North Carolina-Chapel Hill, 1978.

BA, Political Science, North Carolina State University, Raleigh, NC, 1976.

Honorable Discharge, U.S. Military Academy, West Point, NY, 1974.

PRESENTATIONS:

Press conference on declines in infant mortality near closed nuclear reactors, Washington DC, April 26, 2000.

Several presentations in Westchester County on Indian Point reactors, winter/spring 2000.

"Childhood Cancer and Radiation Exposure in New Jersey," Radiation and Public Health Project Seminar with Alec Baldwin, Toms River NJ, 9/21/99, 11/9/99, 5/3/00.

"Infant and Child Health Changes After Opening of Reactors," New York Department of Public Service working group on nuclear power, Albany NY, 6/7/99.

"Health Effects of Indian Point on the Local Population," Westchester People's Action Coalition meeting, Peekskill NY, 4/23/99.

"Twenty Years After Three Mile Island," Unplug Salem rally, Salem, NJ, 3/27/99.

"Effects of Plutonium-238 from Potential Accidents Involving the Cassini Space Probe," United Nations Press Conference, New York, NY, 10/15/98.

"Adverse Health Consequences Near Nuclear Reactors," Nuclear Free Northeast Campaign action camp, Newfane VT, 8/23/98.

"New York State's Reactors Are Killing Us." Women's International League for Peace and Freedom conference, New York, NY, 8/8/98.

"Health Effects of Millstone Reactors on Local Residents." Connecticut Green Party forum. Connecticut College, New London,

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NUCLEAR REGULATORY COMMISSION**

ATOMIC SAFETY AND LICENSING BOARD PANEL

Before Administrative Judges:

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In the Matter of : **Docket Nos. 50-336-LA**
: **and 50-423-LA**

NORTHEAST NUCLEAR
ENERGY COMPANY :
: **ASLBP No. 00-783-09-LA**

(Millstone Nuclear Power Station,
Units 2 and 3) : **October 27, 2000**

AFFIDAVIT OF JOSEPH H. BESADE

I, Joseph H. Besade, having been duly sworn, do hereby depose as follows:

1. I am above the age of eighteen (18) years and I believe in the obligation of an oath.
2. I reside with my family at 21 Fifth Avenue in the Town of Waterford, Connecticut.
3. My home at 21 Fifth Avenue, Waterford, Connecticut, is located approximately two miles from the Millstone Nuclear Power Station.
4. My home is located within the emergency priority evacuation zone of the Millstone Nuclear Power Station.
5. I am a member of the Connecticut Coalition Against Millstone, which is based at 13 Water Street, Mystic Connecticut.
6. The headquarters of the Connecticut Coalition Against Millstone is located within the ten-mile emergency evacuation zone of the Millstone Nuclear Power Station.
7. The Connecticut Coalition Against Millstone is a grass-roots organization devoted to safe and renewable energy sources and environmental protection. Its membership includes statewide organizations, including the Green Party of Connecticut, People's Action for Clean Energy, Citizens Awareness Network, Don't Waste Connecticut and Toxics Action Center; whistleblowers who were fired from their employment at the Millstone Nuclear Power Station because they raised legitimate public health and safety issues; and families and individuals from across the State of Connecticut.
8. I submit this affidavit as a member of the Connecticut Coalition Against Millstone and in its behalf as a representative member in these proceedings.
9. Furthermore, I authorize the Connecticut Coalition Against Millstone to represent me and my rights and interests in these proceedings.
10. I am personally familiar with the applications of Northeast Nuclear Energy Company ("NNECO") to amend its operating licenses for Millstone Nuclear Power Station, Units 2 and 3, by relocating selected radiological effluent technical specifications and associated bases from the licenses at issue to the Millstone Radiological Effluent Monitoring and Offsite Dose Calculation Manual.
11. Said applications concern radiological liquid and gaseous effluent monitoring instrumentation which monitors "routine" radiological releases from 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), according to NNECO.

12. Should the amendments be granted, modifications to the instrumentation and surveillance mechanisms to monitor "routine" radioactive releases into the air and water from Millstone Units 2 and 3 may thereby be effected without public notice and the opportunity for hearing.
13. Should the amendment be granted, I and my family 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.
14. Two years ago, under pressure from licensees of commercial nuclear reactors, the U.S. Nuclear Regulatory Commission terminated its independent radiological monitoring program at Millstone and elsewhere. The only radiological monitoring at Millstone is carried out by the licensee, with insignificant participation by the State of Connecticut.
15. NNECO has an established record of environmental and safety violations at Millstone. One year ago, NNECO pleaded guilty to federal felonies involving falsification of information legally required to be filed with the NRC.
16. As a resident of Waterford, Connecticut, living with my family within two miles of the Millstone Nuclear Power Station, I and my family are presently at risk of adverse health consequences directly attributable to "routine" radiological discharges from Millstone Units 2 and 3.
17. Such "routine" radiological discharges to the air are associated with significant increases in my community of thyroid cancers and blood disorders, including childhood leukemia.
18. It is my belief that an increase in such radiological discharges, and a lowering of standards which limit such discharges, are contemplated in the present applications.
19. I vigorously object to the present applications and call upon the United States Nuclear Regulatory Commission to reject the applications.

Joseph H. Besade

STATE OF CONNECTICUT

ss:

COUNTY OF NEW LONDON/HARTFORD

Sworn to and subscribed before me this 26th day of October, 2000.

Commissioner of the Superior Court/Notary Public

federal felonies involving falsification of information legally required to be filed with the NRC.

- 16. As a resident of Waterford, Connecticut, living with my family within two miles of the Millstone Nuclear Power Station, I and my family are presently at risk of adverse health consequences directly attributable to "routine" radiological discharges from Millstone Units 2 and 3.
- 17. Such "routine" radiological discharges to the air are associated with significant increases in my community of thyroid cancers and blood disorders, including childhood leukemia.
- 18. It is my belief that an increase in such radiological discharges, and a lowering of standards which limit such discharges, are contemplated in the present applications.
- 19. I vigorously object to the present applications and call upon the United States Nuclear Regulatory Commission to reject the applications.

Joseph H. Besade

 Joseph H. Besade

STATE OF CONNECTICUT

ss: Colchester

COUNTY OF NEW LONDON/~~HARTFORD~~

Sworn to and subscribed before me this 26th day of October, 2000.

Louise M. Marshall

 Commissioner of the Superior Court/Notary Public
 My commission expires: 2-28-03

My commission expires: _____

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)	:	October 27, 2000

CERTIFICATE OF SERVICE

This is to certify that a copy of the **“CONNECTICUT COALITION AGAINST MILLSTONE AND STAR FOUNDATION AMENDED PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING,”** and **“Affidavit of Joseph H. Besade”** and **“Affidavit of John Thatcher”** and **“Declaration of Joseph Mangano”** 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 October 27, 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

Lawrence J. Chandler, Esq.
Office of the General Counsel
Mail Stop – O-15 D21
U.S. Nuclear Regulatory Commission
Washington DC 20555

Administrative Judge
Ann Marshall Young, Chairman
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Board Panel
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U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

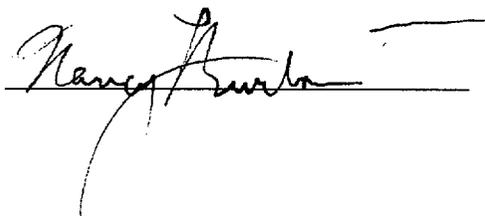
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A handwritten signature in cursive script, appearing to read "Nancy Strawn", is written over a horizontal line. The signature is fluid and somewhat stylized, with a long, sweeping tail that extends downwards and to the left.