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**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

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<b>In the Matter of:</b>	:	<b>Docket No. 50-336</b>	<i>-MLA</i>
	:	<b>Docket No. 50-423</b>	
<b>NORTHEAST NUCLEAR</b>	:		
<b>ENERGY COMPANY</b>	:		
<b>(Millstone Nuclear</b>	:		
<b>Power Station,</b>	:		
<b>Unit Nos. 2 and 3)</b>	:	<b>NOVEMBER 8, 2000</b>	

**CERTIFICATE OF SERVICE**

This is to certify that a copy of corrected page 2 of the "CONNECTICUT COALITION AGAINST MILLSTONE AND STAR FOUNDATION AMENDED PETITION FOR LEAVE TO INTERVENE AND REQUEST FOR HEARING" and "Affidavit of Christine Guglielmo" was faxed to Lee S. Dewey at 301-415-5599 and sent via U.S. Mail, postage pre-paid to the following on November 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

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Office of the General Counsel  
Mail Stop - O-15 D21  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

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*SECY-02*

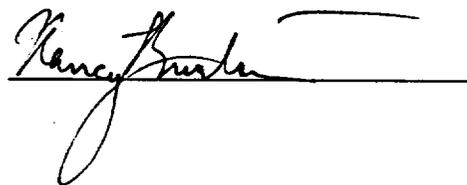
Administrative Judge  
Ann Marshall Young, Chairman  
Atomic Safety and Licensing  
Board Panel  
Mail Stop – T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington DC 20555-0001

Administrative Judge  
Thomas S. Moore  
Atomic Safety and Licensing  
Board Panel  
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U.S. Nuclear Regulatory Commission  
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Administrative Judge  
Charles N. Kelber  
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A handwritten signature in black ink, appearing to read "Nancy Brada", is written over a solid horizontal line.

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-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. The Affidavit of Christine Guglielmo 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.

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**ATOMIC SAFETY AND LICENSING BOARD PANEL**

Before Administrative Judges:

Ann Marshall Young, Chair

Dr. Charles N. Kelber

Thomas S. Moore

**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)** : **November 7, 2000**

**AFFIDAVIT OF CHRISTINE GUGLIELMO**

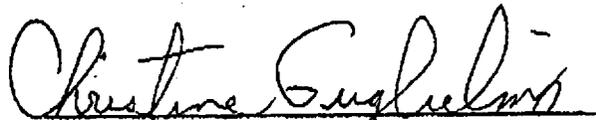
I, Christine Guglielmo, having been duly sworn, do hereby depose as follows:

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 in the Town of East Hampton, New York.
3. My home is located approximately twenty miles from the Millstone Nuclear Power Station.
4. My home is located within the NRC's emergency planning zone of the Millstone Nuclear Power Station.
5. I am a member of the STAR Foundation, which is based at 66 Newtown Lane, East Hampton, New York.
6. The STAR Foundation is a grass-roots organization devoted to safe and renewable energy sources and environmental protection with members who reside within the immediate proximity of Millstone and within the ten-mile emergency planning zone.
8. I submit this affidavit as a member of the STAR Foundation and authorize the organization to represent me as a representative member in these proceedings.
9. Furthermore, I authorize the STAR Foundation 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 Long Island living with my family within sight 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 State Nuclear Regulatory Commission to reject the applications.

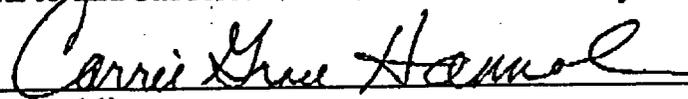
  
Christine Guglielmo

STATE OF NEW YORK

ss:

COUNTY OF SUFFOLK

Sworn to and subscribed before me this 7<sup>TH</sup> day of November, 2000.

  
Notary Public  
My commission expires: 11/08/2001

CARRIE GRACE HANNAH  
Notary Public, State of New York  
No. 02HA6032886  
Qualified in Suffolk County  
Commission Expires 11/08/2001