

EDO Principal Correspondence Control

FROM: Fred P. Edelstein
Town of Haddam

DUE: 07/24/01

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FINAL REPLY:

TO: Chairman Meserve

FOR SIGNATURE OF : Collins, NRR

** GRN **

CRC NO: 01-0334

DESC: Connecticut Yankee Nuclear Power Plant

ROUTING: Travers
Paperiello
Kane
Norry
Craig
Burns/Cyr
Miller, RI
Virgilio, NMSS

DATE: 07/03/01

ASSIGNED TO: NRR

CONTACT: Collins

SPECIAL INSTRUCTIONS OR REMARKS:

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

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AUTHOR: FRED EDELSTEIN
AFFILIATION: CT
ADDRESSEE: RICHARD MESERVE
SUBJECT: CONNECTICUT YANKEE NUC POWERPLANT

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DATE DUE: 07/24/2001 **DATE SIGNED:**

6815



Town of Haddam

✓ Nuclear Regulatory Commission
Att: Dr. Richard A. Meserve, Chairman
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

June 27, 2001

c. Sen. C. Dodd; Sen. J. Lieberman; Gov. J. Rowland;
Cong. R Simmons; A.G. R. Blumenthal
NRC Region 1 Headquarters; 1st Selectman A. Bondi;

Dear Sir,

The Town of Haddam, has been the home of the Connecticut Yankee Nuclear Power Plant (CY) since its construction in the 1960's. In 1995, the owners of the plant (CYAPCO) decided to permanently shutter the plant.

They are now in the process of "decommissioning" and have been preparing a License Termination Plan (LTP) CYAPCO management has publicly declared that they are in the process of "going out of business". Comments on he LTP are not included in this letter since they are being addressed in public hearings and since the LTP specifically excludes discussions on fuel storage.

For approximately the past year the Town of Haddam and the management of CYAPCO have been in discussions regarding zoning and zoning regulations. To date this issue has not been resolved.

During this period of time several widely attended public meetings have been held, including 3 Planning and Zoning hearings. During & since these meetings the public has addressed many concerns to town officials. Unfortunately we cannot address many of these concerns since they involve issues of nuclear safety and radiation. It is clear from several court rulings that the town cannot make rules and regulations to address these concerns.

Therefore the town has addressed these concerns to CYAPCO and some officials of the NRC. Admittedly, these concerns have not been addressed in a persistent manner, especially to NRC personnel. However we have addressed some of these issues in public and private forums and have not received satisfactory answers. In addition over the past few months' additional concerns have been raised.

Surely, the NRC will be diligent and insure that CYAPCO will leave only a soundly planned and implemented high level radioactive waste facility. However, many of the questions need to be answered before plan implementation is begun.

Board of Selectmen, 30 Field Park Drive, Haddam, CT 06438
Phone (860) 345-8531 • Fax (860) 345-3730

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Since ultimately only the federal government and more specifically the NRC can address these concerns, we are bringing them to your attention.

These concerns were prepared and codified by concerned citizens from Haddam, Haddam Neck and representatives of 2 independent groups-Citizens Awareness Network and Citizens Against Nuclear Dump. They consulted with local and national experts and finally presented this list of top issues and concerns to the Board of Selectman.

Let us stress that these concerns have been addressed to CYAPCO and to date adequate or forthright answers have not been received. They seem to have the attitude that we are uninformed novices and that they should just be trusted. Unfortunately their motivations are not necessarily those that are in the best interests of nuclear safety and the future of Haddam. Their motives are not questions but unlike most of us involved they have shareholders and profit motives to consider. As mentioned before, they have stated that they want to go "out of business". With such a prospective it is hard to look to the long-term future.

The list is attached and is submitted to you so that you can provide the Board of Selectmen with answers that can be shared with our community.

The balance of this letter addresses additional issues of importance to the town of Haddam, & the State of Connecticut. They require guidance from the NRC, but are not addressed directly by the citizens concerns.

1) For the past 11 months the town has been in a dispute over 15 acres of residentially zoned land. CYAPCO has designated this land for the construction of a high level radioactive waste facility. However this land has never been a part of the nuclear foot print and was never approved for industrial use; nor for that matter any use other than residential. Thus this dispute is purely a zoning matter. This dispute was brought to federal court by CYAPCO, but has since been dismissed.

Recently we have learned that, despite nearly a yearlong dispute, CYAPCO has never inquired of the NRC whether this 15-acre parcel would be acceptable to the NRC for the storage of 43 dry cask units. Nor has the NRC been asked to review the other sites that CY has evaluated. Are sites that are equally or better suited being rejected due to cost considerations?

We are confused as to what roles the NRC plays in the placement of the dry cask facility. Shouldn't the NRC be involved before state or federal courts are utilized?

2) Several years ago CYAPCO proposed that a gas fired power plant be constructed on the current site of CY's parking lot. At that time the spent fuel was designated to remain in the spent fuel pool. More recently CY has proclaimed that for safety considerations the spent fuel must be moved to dry cask storage and moved very far from the gas fired plant. We know that some hazard analysis has been completed but we do not know the results were or how extensive the analysis.

More importantly we are unfamiliar with the requirements of the NRC. We have no knowledge of where, if any place, the NRC would permit the placement of a gas fired power plant in relation to the spent fuel. We have no knowledge of what the NRC would require in the way of hazard analysis and what safety margins would be required.

We have been informed by CYAPCO that, to this point, the NRC not provided any guidance. Moreover, it appears that CYAPCO has never requested such guidance.

Certainly the placement of a gas-fired power plant would be of significant financial benefit to the Town of Haddam. Additionally, the region could certainly benefit by a clean new source of electricity. It has also been reported that CYAPCO would receive \$12,000,000 for the land and reusable facilities.

Thus we would very much appreciate guidance on the matter.

3) CY, in an application for a building permit, has proposed the installation of a special toilet system. The town's health director has approved the system as proposed. However the approval restricts occupancy to 2-3 persons per shift or 9 people per day.

Unfortunately we have not been able to obtain any security arrangement answers from CYAPCO> Each time the question about manpower is raised CYAPCO tells us that it must remain confidential claiming that public release of such information would compromise their security arrangements. Unfortunately with a public document restricting manpower to 2-3 persons, any group want to penetrate the security zone would know that only 2-3 people would be involved in any security plan. How can we go about knowing if this 2-3-person restriction will be acceptable to the NRC?

On behalf of the Board of Selectmen

Respectfully Submitted

Fred P. Edelstein, Selectman

A handwritten signature in black ink that reads "Fred Edelstein". The signature is written in a cursive style with a large initial "F" and "E".

Concerned citizens from Haddam, Haddam Neck, representatives of CAN and Citizens Against Nuke Dump in consultations with local and national experts, have come up with the following list of issues and concerns they want addressed

1. Forbid waste from other facilities

Regardless of who owns or controls the storage facility in the future no wastes from other sites should be permitted to be stored in Haddam.

2. Seismic Activity

Experts have studied the CY site over the years and established that the entire site is situated on an active fault. Given the fact that the facility could be here for a very long time, this is a serious concern for residents in town. CY has chosen to ignore the input from Geologist Prof. Deboer regarding the fact that even a small earthquake could have serious consequence on the integrity of the fuel rods inside the concrete casks if the pad is not anchored to bedrock. The suggestions of Prof. Deboer for sediment testing, final choice of location and design of the facility should be an integral part of CY's final plans

3. Keep the dry cask on the existing power plant foot print

The existing footprint has bedrock closer to the surface, allowing for better anchoring. Furthermore since this area has already been contaminated, keeping the dry casks there will avoid unnecessary contamination of clean areas outside the footprint.

There are practical berm solutions for potential flood issue.

If future use of the footprint is an issue (i.e gas plant), the consensus is that this issue should be secondary to safe storage. However we believe that appropriate measures can be implemented to insure the safety of the fuel storage and have the gas plant constructed.

4. Back up safety:

Plans should include a wet pool and access to emergency water supply in case a breach occurs or should a canister overheat. Or alternately, some other acceptable method for dealing with a breach should be implemented. Equipment must be available for implementing back-up safety.

5. Robust staffing of the storage facility

Staffing requirements must include trained and qualified personnel to carry out radiation monitoring, on site security and on site response in the event of a developing problem.

6. Off Site Emergency Preparedness

Emergency plans with neighboring towns and communities should be established. At a minimum, the same contingencies that apply to a truck carrying the same canisters that is involved in an accident (i.e. a 40 miles radius evacuation plan) should also apply to the storage facility. Community notification sirens should be re-installed.

7. Continuous air and water radiation monitoring.

8. Protection against terrorist attacks

There is a concern that the facility could become a target for terrorism. There should be consideration for shielding the casks or canisters either by placing them in the existing dome or constructing a bunker type cover.

Respectfully submitted
Ed Schwing.