

August 27, 2004

Mr. David A. Christian  
Senior Vice President and Chief Nuclear Officer  
Dominion Nuclear Connecticut, Inc.  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: ISSUANCE OF ENVIRONMENTAL SCOPING SUMMARY REPORT  
ASSOCIATED WITH THE STAFF'S REVIEW OF THE APPLICATIONS BY  
DOMINION NUCLEAR CONNECTICUT, INC. FOR RENEWAL OF THE  
OPERATING LICENSES FOR THE MILLSTONE POWER STATION,  
UNITS 2 AND 3

Dear Mr. Christian:

The U.S. Nuclear Regulatory Commission (NRC) conducted a scoping process, from March 31, 2004, through June 4, 2004, to determine the scope of the NRC staff's environmental review of the applications for renewal of the operating licenses for the Millstone Power Station, Units 2 and 3 (Millstone). As part of the scoping process, the NRC staff held two public environmental scoping meetings in Waterford, Connecticut, on May 18, 2004, to solicit public input regarding the scope of the review. The scoping process is the first step in the development of a plant-specific supplement to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS)," for the Millstone Power Station, Units 2 and 3.

The NRC staff has prepared the enclosed environmental scoping summary report identifying comments received at the May 18, 2004, license renewal environmental scoping meetings, by letter, and by electronic mail. In accordance with Section 51.29(b) of Title 10 of the *Code of Federal Regulations*, you are being provided a copy of the environmental scoping summary report. The transcripts of the meetings can be found as an attachment to the meeting summary issued on June 24, 2004. The meeting summary is available for public inspection in the NRC Public Document Room (PDR) located at One White Flint North, 11555 Rockville Pike (first floor), Rockville Maryland or electronically from the Publicly Available Records (PARS) component of NRC's document system (ADAMS) under Accession Number ML041830272. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html> (the Public Electronic Reading Room) (Note that the URL is case-sensitive). Persons who do not have access to ADAMS or who encounter problems in accessing the documents located in ADAMS should contact the NRC's PDR staff at 1-800-397-4209, or 301-415-4737, or by e-mail at [pdr@nrc.gov](mailto:pdr@nrc.gov).

D. Christian

- 2 -

The next step in the environmental review process is the issuance of a draft supplement to the GEIS scheduled for December 2004. Notice of the availability of the draft supplement to the GEIS and the procedures for providing comments will be published in an upcoming *Federal Register* notice. If there are any questions concerning this matter, please contact me at (301) 415-1590.

Sincerely,

***/RA/***

Richard L. Emch, Jr., Senior Project Manager  
Environmental Section  
License Renewal and Environmental Impacts Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-336 and 50-423

Enclosure: As stated

cc w/encl: See next page

D. Christian

- 2 -

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**Environmental Impact Statement  
Scoping Process**

**Summary Report**

**Millstone Power Station  
Units 2 & 3  
New London County, Connecticut**

**August 2004**



**U.S. Nuclear Regulatory Commission  
Rockville, Maryland**

## Introduction

On January 22, 2004, the Nuclear Regulatory Commission (NRC) received applications from Dominion Nuclear Connecticut Inc. (Dominion) dated January 20, 2004, for renewal of the operating licenses of Millstone Power Station Units 2 and 3 (Millstone). The Millstone units are located in New London County, Connecticut. As part of the applications, Dominion submitted an environmental report (ER) prepared in accordance with the requirements of Title 10 of the *Code of Federal Regulations* Part 51 (10 CFR Part 51). 10 CFR Part 51 contains the NRC requirements for implementing the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations promulgated by the Council on Environmental Quality (CEQ). Section 51.53 outlines requirements for preparation and submittal of environmental reports to the NRC.

Section 51.53(c)(3) was based upon the findings documented in NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants," (GEIS). The GEIS, in which the staff identified and evaluated the environmental impacts associated with license renewal, was first issued as a draft for public comment. The staff received input from Federal and State agencies, public organizations, and private citizens before developing the final document. As a result of the assessments in the GEIS, a number of impacts were determined to be small and to be generic to all nuclear power plants. These were designated as Category 1 impacts. An applicant for license renewal may adopt the conclusions contained in the GEIS for Category 1 impacts, absent new and significant information that may cause the conclusions to fall outside those of the GEIS. Category 2 impacts are those impacts that have been determined to be plant-specific and are required to be evaluated in the applicant's ER. The Commission determined that the NRC does not have a role in energy planning decision-making for existing plants, which should be left to State regulators and utility officials. Therefore, an applicant for license renewal need not provide an analysis of the need for power, or the economic costs and economic benefits of the proposed action. Additionally, the Commission determined that the ER need not discuss any aspect of storage of spent fuel for the facility that is within the scope of the generic determination in 10 CFR 51.23(a) and in accordance with 10 CFR 51.23(b). This determination was based on the Nuclear Waste Policy Act of 1982 and the Commission's Waste Confidence Rule, 10 CFR 51.23.

On April 7, 2004, the NRC published a Notice of Intent in the *Federal Register* (69 FR 18409), to notify the public of the staff's intent to prepare a plant-specific supplement to the GEIS to support the renewal application for the Dominion operating licenses. The plant-specific supplement to the GEIS will be prepared in accordance with NEPA, CEQ guidelines, and 10 CFR Part 51. As outlined by NEPA, the NRC initiated the scoping process with the issuance of the *Federal Register* Notice. The NRC invited the applicant, Federal, State, and local government agencies, local organizations, and individuals to participate in the scoping process by providing oral comments at the scheduled public meetings and/or submitting written suggestions and comments no later than June 4, 2004. The scoping process included two public scoping meetings, which were held at the Town Hall in Waterford, Connecticut, on May 18, 2004. The NRC issued press releases, and distributed flyers locally. Approximately ninety-five (95) members of the public attended the meetings. Both sessions began with NRC staff members providing a brief overview of the license renewal process and the NEPA process. Following the NRC's prepared statements, the meetings were open for public comments. Thirty-three (33) attendees provided either oral comments or written statements that were recorded and transcribed by a certified court reporter. The transcripts of the meetings can be found as an attachment to the meeting summary, which was issued on June 24, 2004. The

meeting summary is available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS) under accession number ML 041830272. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm.html> (the Public Electronic Reading Room) (Note that the URL is case-sensitive).

The scoping process provides an opportunity for public participation to identify issues to be addressed in the plant-specific supplement to the GEIS and highlight public concerns and issues. The Notice of Intent identified the following objectives of the scoping process:

- Define the proposed action
- Determine the scope of the supplement to the GEIS and identify significant issues to be analyzed in depth
- Identify and eliminate peripheral issues
- Identify any environmental assessments and other environmental impact statements being prepared that are related to the supplement to the GEIS
- Identify other environmental review and consultation requirements
- Indicate the schedule for preparation of the supplement to the GEIS
- Identify any cooperating agencies
- Describe how the supplement to the GEIS will be prepared

At the conclusion of the scoping period, the NRC staff and its contractor reviewed the transcripts and all written material received, and identified individual comments. Eight (8) letters, e-mails, or documents containing comments were also received during the scoping period. All comments and suggestions received orally during the scoping meetings or in writing were considered. Each set of comments from a given commenter was given a unique alpha identifier (Commenter ID letter), allowing each set of comments from a commenter to be traced back to the transcript, letter, or email in which the comments were submitted. Several commenters submitted comments through multiple sources (e.g., letter and afternoon or evening scoping meetings).

Comments were consolidated and categorized according to the topic within the proposed supplement to the GEIS or according to the general topic if outside the scope of the GEIS. Comments with similar specific objectives were combined to capture the common essential issues that had been raised in the source comments. Once comments were grouped according to subject area, the staff and contractor determined the appropriate action for the comment.

Table 1 identifies the individuals providing comments and the Commenter ID letter associated with each person's set(s) of comments. The Commenter ID letter is preceded by MS (short for Millstone Power Station scoping). For oral comments, the individuals are listed in the order in which they spoke at the public meeting. Accession numbers indicate the location of the written comments in ADAMS.

The comments and suggestions received as part of the scoping process are documented in this section and the disposition of each comment is discussed. Comments are grouped by category. The categories are as follows:

1. Comments Regarding License Renewal and Its Processes
2. Comments in Support of License Renewal at Millstone Power Station, Units 2 and 3
3. Comments in Opposition to License Renewal at Millstone Power Station, Units 2 and 3
4. Comments Concerning Water Quality and Use
5. Comments Concerning Aquatic Ecology
6. Comments Concerning Air Quality
7. Comments Concerning Socioeconomics
8. Comments Concerning Land Use
9. Comments Concerning Human Health
10. Comments Concerning Uranium Fuel Cycle and Waste Management
11. Comments Concerning Postulated Accidents
12. Comments Concerning Alternatives
13. Comments Concerning Issues Outside the Scope of License Renewal: Safeguards, Security and Terrorism; Emergency Response and Preparedness, and Operational Safety and Security, Emergency Response and Preparedness, and Operational Safety

Each comment is summarized in the following pages. For reference, the unique identifier for each comment (Commenter ID letter listed in Table 1 plus the comment number) is provided. In those cases where no new environmental information was provided by the commenter, no further evaluation will be performed.

The preparation of the plant-specific supplement to the GEIS (which is the SEIS) will take into account all the relevant issues raised during the scoping process. The SEIS will address both Category 1 and 2 issues, along with any new information identified as a result of scoping. The SEIS will rely on conclusions supported by information in the GEIS for Category 1 issues, and will include the analysis of Category 2 issues and any new and significant information. The draft plant-specific supplement to the GEIS will be made available for public comment. The comment period will offer the next opportunity for the applicant, interested Federal, State, and local government agencies, local organizations, and members of the public to provide input to the NRC's environmental review process. The comments received on the draft SEIS will be considered in the preparation of the final SEIS. The final SEIS, along with the staff's Safety Evaluation Report (SER), will provide much of the basis for the NRC's decision on the Dominion license renewal application.

**TABLE 1 - Individuals Providing Comments During Scoping Comment Period**

<b>Commenters ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number<sup>(a)</sup></b>
MS-A	Gerald Gaynor Jr.	Mayor, City of New London	Afternoon Scoping Meeting
MS-B	Mr. Fraser	First Selectman, Town of East Lyme	Afternoon Scoping Meeting
MS-C	Melodie Peters	CT State Senator	Afternoon Scoping Meeting
MS-D	Andrea Stillman	CT State Representative	Afternoon Scoping Meeting
MS-E	Richard Brown	City Manager, City of New London	Afternoon Scoping Meeting
MS-F	Steve Scace	Director of Safety and Licensing, Millstone	Afternoon Scoping Meeting
MS-G	Mr. Medeiros	Commercial Fisherman	Afternoon Scoping Meeting
MS-H	Mr. Maderia	Commercial Fisherman	Afternoon Scoping Meeting
MS-I	Nancy Burton	Spokesperson for the Connecticut Coalition Against Millstone	Afternoon Scoping Meeting
MS-J	Don Klepper-Smith	Data Core Partners, LLC	Afternoon Scoping Meeting
MS-K	Stephen Negri	Local Resident	Afternoon Scoping Meeting
MS-L	Brigadier General Zembrzuski	Deputy General, Connecticut National Guard	Afternoon Scoping Meeting
MS-M	John Markowicz	Executive Director, Southeastern CT Enterprise Region	Afternoon Scoping Meeting
MS-N	Susan McNamara	Executive Director, Long Island Sound Foundation	Afternoon Scoping Meeting
MS-O	Tony Sheridan	President, Chamber of Commerce of Eastern CT	Afternoon Scoping Meeting
MS-P	Evan Woollacott	Co-Chairman, CT Nuclear Energy Advisory Council	Afternoon Scoping Meeting
MS-Q	Paul Eccard	First Selectman, Town of Waterford	Evening Scoping Meeting
MS-R	Janet Dinkel Pearce	President, United Way of Southeastern CT	Evening Scoping Meeting
MS-S	James Butler	Executive Director, Southeastern CT Council of Government	Evening Scoping Meeting
MS-T	Steve Scace	Director of Safety and Licensing, Millstone	Evening Scoping Meeting
MS-U	Marvin Berger	Local resident	Evening Scoping Meeting
MS-V	Geraldine Winslow	Local resident	Evening Scoping Meeting
MS-W	Pete Reynolds	Local resident	Evening Scoping Meeting
MS-X	Michael Steinberg	Local resident	Evening Scoping Meeting
MS-Y	Mr. Schwartz	Local resident	Evening Scoping Meeting

<b>Commenters ID</b>	<b>Commenter</b>	<b>Affiliation (If Stated)</b>	<b>Comment Source and ADAMS Accession Number<sup>(a)</sup></b>
MS-Z	John "Bill" Sheehan	Vice Chairman, CT Nuclear Energy Advisory Council	Evening Scoping Meeting
MS-AA	Tony Sheridan	President, Chamber of Commerce of Eastern CT	Evening Scoping Meeting
MS-AB	George Kee	Local resident	Evening Scoping Meeting
MS-AC	JQ	Local resident	Evening Scoping Meeting
MS-AD	John Markowicz	Executive Director, Southeastern CT Enterprise Region & Co-Chairman, CT Nuclear Energy Advisory Council	Evening Scoping Meeting
MS-AE	Fred W. Thiele, Jr.	Member, Assembly of the State of New York	Letter (ML041620373)
MS-AF	Lucille C. Malouche	Local resident	Letter (ML041620380)
MS-AG	Hortense and Ralph Carpentier	Local resident	Letter (ML041770288)
MS-AH	Charles D. Stephani	Local resident	Letter (ML041770290)
MS-AI	Douglas Schwartz	Local resident	Letter (ML041770175)
MS-AJ	Kelly L. Streich	Local resident	Letter (ML041770177)
MS-AK	Michael Steinberg	Local resident	Letter (ML041770179)
MS-AL	Nancy Burton	Spokesperson for the Connecticut Coalition Against Millstone	Letter (ML041770182)

- (a) The accession number for the afternoon transcript is ML041740756  
The accession number for the evening transcript is ML041740767  
The accession number for the attachments to the evening transcript is ML041750500

## **Millstone Power Station (Millstone), Units 2 and 3 Public Scoping Meeting Comments and Responses**

The comments and suggestions received as part of the scoping process are discussed below. Parenthetical numbers after each comment refer to the Commenter's ID letter and the comment number. Comments can be tracked to the commenter and the source document through the ID letter and comment number listed in Table 1.

### **1. Comments Regarding License Renewal and Its Processes**

**Comment:** It's important for our community to know that the license renewal is an independent, time-tested process. The NRC led process is extremely rigorous. An analysis analyzes not only the physical systems and components at the plant, but also the plant work processes and programs.  
(MS-F-2)

**Comment:** Therefore, my first specific recommendation is that the NRC consider relicensing as an impact to be mitigated to achieve substantial understanding and acceptance by the host community. I think the community deserves expert advice and opinion as well as the applicant certainly has available to it.  
(MS-Q-2)

**Comment:** ... what the NRC has to do is make an in-depth evaluation of license renewal equal to the efforts spent on the original FSAR, Final Safety Analysis Report.  
(MS-AB-1)

**Comment:** And the other question I was wondering about was the, I think I'm saying it right, GEIS, the environmental impact, the generics of it. They took a generic of all the plants in the whole country. I forget how many there is now, probably a little over 100 plants. They are saying that, generically, they all produce radiation. Generically, they all produce leaks. Generically, they all have breakdowns that causes releases to the environment. So, generically, all these plants are bad. All they are looking for, for this license renewal, is if Millstone is worse than the other ones. That's what it seems like to me.  
(MS-W-6)

**Response:** *The comments address the license renewal process. The Commission has established a process, by rule, for the environmental and safety reviews to be conducted to review a license renewal application. The comments provide no significant, new information; therefore, the comments will not be evaluated further.*

### **2. Comments in Support of License Renewal at Millstone Power Station, Units 2 and 3**

**Comment:** As New London's top elected official, it is my pleasure to be here today to endorse the relicensing of Millstone Units 2 and 3.  
(MS-A-1)

**Comment:** In closing, I believe that the relicensing of Millstone is important for the future of our community.  
(MS-A-4)

**Comment:** The feeling of trust has definitely grown from a company that we knew nothing about. We now consider this company a friend. As a major community leader, I have the trust that whatever goes on in that plant and that the best safety practices will be followed.  
(MS-B-2)

**Comment:** I fully support their need to extend the licensing of their plant.  
(MS-B-3)

**Comment:** They worked with local and state officials. They worked with coalitions of concerned citizens as well as with the NEAC, they have never in my opinion in the years they've been here have put the community at risk.  
(MS-C-1)

**Comment:** I just simply want to say it's my pleasure to stand here also endorsing and asking for your serious consideration of all of these environmental issues, quality of life issues, with respect to lengthening or renewing a license for the Millstone plant.  
(MS-C-7)

**Comment:** But I do agree with the previous speakers that the plant at Millstone which is now owned by the Dominion Corporation really has done a wonderful job restoring faith that this community needs to have in the plant that is within a mile of my house.  
(MS-D-1)

**Comment:** I do think that they've come really miles in improving nuclear plants, improving the environmental concerns that we all have and again, I do support the license renewal, this most important part of the economy.  
(MS-D-6)

**Comment:** I support the relicensing of Millstone Units 2 and 3. Millstone is operated in a safe and efficient manner.  
(MS-E-1)

**Comment:** We support the relicensing.  
(MS-E-4)

**Comment:** I have come here today to speak in favor of a renewal of the operating license for Millstone Units 2 and 3. I live in the Millstone Point Association, an area that could not be any closer to the nuclear power station. My wife and I have lived there nearly 14 years, and I have absolutely no fear or concerns about the station. We believe that positive improvements have been made over the last several years and that Dominion has proven to be a good and responsible neighbor. Dominion has kept its neighbors well informed and regularly contacts us about our concerns. As the former President of the Millstone Point Association, I can describe our communications and the company's cooperation as excellent.  
(MS-K-1)

**Comment:** The fact that the organization met once last year and has so far met once this year, compared to the monthly and in some cases almost every other night meetings that we've had during the restarting of the power plant, bears testimony to the amount of reconfidence in the regulator, the plant supervision being done by the resident inspectors, and also in the ability of the plant operators to rise above the criticism, to restore in the community the faith and trust in the safe operation of the plant under new management.

(MS-M-1)

**Comment:** They provide aid to many organizations such as ours both financially and as a volunteer support system. We feel Dominion is an asset to our state, the region, and this community.

(MS-N-1)

**Comment:** These are people who are bright, intelligent, capable, caring people. They have families. They live in the community. They serve on boards and agencies. They work very hard to do the right thing. In fact, they are disciplined if they don't do the right thing. Often, safety first is a criteria up there that there is no second.

(MS-O-2)

**Comment:** I believe that relicensing of the generators is in the best interest of this community.

(MS-Q-1)

**Comment:** In fact, Dominion and the Millstone employees have contributed over one million dollars to United Way in the past three years. Additionally, they have loaned us several employees and provided funding for another employee to assist during our annual campaign. Furthermore, their employees are actively involved throughout the community as volunteers.

(MS-R-1)

**Comment:** Barring any regulatory issues uncovered during the scoping process, the Council Government is in support of this application.

(MS-S-2)

**Comment:** We want to continue to be a positive influence in our community while we continue to meet Connecticut's energy needs. License renewal will make that possible.

(MS-T-2)

**Comment:** License renewal will help ensure that Millstone remains available to meet these future energy needs.

(MS-T-3)

**Comment:** I'm here to support the relicensing of the plants, not only because of the economic impact they have on our community and indeed on the state and on New England, but because they're safe.

(MS-AA-1)

**Comment:** It is important that Millstone Point continues to provide the power safely to this country for many years to come as it has in the past.

(MS-AB-2)

**Comment:** The confidence of the Nuclear Energy Advisory Council in the Regulator and in the operators of the plant was restored during the restart process.  
(MS-AD-2)

**Response:** *The comments are supportive of license renewal at Millstone and general in nature. The comments provide no significant, new information; therefore, the comments will not be evaluated further.*

### **3. Comments in Opposition to License Renewal at Millstone Power Station, Units 2 and 3**

**Comment:** I'm here as a host community citizen begging you not to continue down this dangerous path of producing nuclear electricity in my hometown by not renewing this license.  
(MS-V-1)

**Comment:** I'm wondering how we can judge the environmental impact of what condition Long Island Sound will be in another 15 years. How can we predetermine that now? We don't know what condition the environment will be in another 15 years, but we can't go ahead with the license renewal until we get to that point as far as I'm concerned.  
(MS-V-8)

**Comment:** ... I don't think they should get their license renewal.  
(MS-W-3)

**Comment:** I'm here tonight to unconditionally oppose the relicensing of the Millstone Nuclear Power Station.  
(MS-X-1)

**Comment:** Right now, I can't go for renewal of the license.  
(MS-AC-2)

**Comment:** I urge you not to approve of the renewal of the licenses for the Millstone Power Station.  
(MS-AF-1)

**Comment:** We strongly urge denial of the license renewal application to the NRC.  
(MS-AG-1)

**Comment:** I am writing to let you know of my vehement objection not only to not extend Millstone's request for a renewal and extension of their license, but to object to its very existence.  
(MS-AH-1)

**Comment:** Because of the strong possibility of Millstone's radioactive emissions contributing to the causes of these high rates of cancers, the U.S. Nuclear Regulatory Commission, in its mission of protecting the public's health and safety, should not grant Dominion Nuclear Connecticut a license to operate Millstone Units 2 and 3 for an additional 20 years each.  
(MS-AK-2)

**Response:** *The comments oppose license renewal at Millstone and general in nature. The comments provide no significant, new information; therefore, the comments will not be evaluated further.*

#### **4. Comments Concerning Water Quality and Use**

**Comment:** They've been operating with an invalid permit that expired in 1997 to discharge these chemicals. If they were to go to a closed system which they know about, they would not be killing these fish and other things that are going in there and they wouldn't have to use this chemical to clean it either.  
(MS-G-3)

**Comment:** I want to briefly discuss the issue of the Clean Water Act. Under the Federal Clean Water Act, this facility requires a valid permit to take in the billions of gallons of water per day that it needs to keep the reactors from melting down and to flush out chemicals into the sea. The organization that I'm affiliated with has brought this issue to various legal public fora. We have demonstrated without any doubt that the permit is not valid. Not only that, the information that Dominion has submitted to the NRC is incorrect. It relies upon submission of materials suggesting that the company has obtained lawful permits to do what it has been doing to the environment which, as you have heard, has been devastating to the indigenous winter flounder.  
(MS-I-5)

**Comment:** Second, the fact that the Millstone Point Station has not received a renewal of the discharge permit from the Department of Environmental Protection is of considerable concern.  
(MS-Q-4)

**Comment:** It is essential that the approval by the Department of Environmental Protection of the NPDES renewal application occur prior to granting the application for relicensing in my view. This concern is further reinforced by the fact that the plant operates at variance with the Clean Water Act as approved by the Commission of the Connecticut Department of Environmental Protection.  
(MS-Q-6)

**Comment:** Eighth, the license renewal process concerns me in that it fails to include a description of the changes that have occurred since the initial license was issued; things like the harvesting of shellfish from Jordan Cove, which has been conditionally open, and the impact of the installation of a new water line to the site and the result in changing consumption rates. I anticipate that both of these changes and conditions will be carefully explored during this process.  
(MS-Q-13)

**Comment:** The discharge permit, it's been an issue since 1993. It was brought up in 1997. It's been brought up at several meetings of the EPUC, the City Council, the Environmental Protection Agency. They are still operating under emergency discharge.  
(MS-W-7)

**Comment:** These facts require the U.S. Nuclear Regulatory Commission to consider the prospect of its relicensing of Millstone nuclear reactors when the reactors are being operated in continuing flagrant violation of the federal Clean Water Act.  
(MS-AL-1)

**Response:** *The comments are related to the status of Dominion's application for a revised National Pollutant Discharge Elimination System (NPDES) permit for Millstone and Millstone's compliance with the Clean Air Act. The Department of Environmental Protection (DEP) is responsible for the review and issuance of NPDES permits in Connecticut. DEP is also responsible for implementation of the Clean Water Act in Connecticut. The NRC does not have authority over matters concerning discharge permits or compliance with the Clean Water Act. The comments provide no significant, new information; therefore, the comments will not be evaluated further. The status of Dominion's NPDES permit application will be discussed in Chapters 2 and 4 of the SEIS.*

**Comment:** Dominion also has been exploring ideas for creative ways to deal with watershed management aside from the obligations that they are going to be held to in the reissuing of their permit.  
(MS-C-5)

**Comment:** The other thing is when the cooling system when they discharge, they discharge hydrazine which is cancer-causing chemical that causes cancer in fish and probably humans too.  
(MS-G-2)

**Comment:** Seventh, does Millstone Point Station sample the sediments in Jordan Cove? Are there radioactive deposits identified in these sediments? What are they and in what quantity do they exist?  
(MS-Q-12)

**Comment:** Those plants contribute to global warming and it increases the temperature of the water used in the cooling. One million gallons per minute of Long Island Sound are sucked in and out of that power, each plant, so that would be times two for Millstone. Many compounds, radiological and industrial chemicals like hydrazine, are discharged routinely.  
(MS-V-3)

**Comment:** The potential accumulation of Hydrazine and Uranium in our local waters and marine life is deeply troubling and presents a serious hazard to public health. It is critical to the protection of our natural resources and the public health that we investigate the extent of the pollution and, most importantly, target the source to eliminate further discharge of these deadly toxins into our waters.  
(MS-AE-3)

**Comment:** I encourage you to request further information from me as will assist your environmental analysis. For example, the Connecticut Coalition Against Millstone presented testimony of an expert in chemistry in a Connecticut Superior Court proceeding in which the expert testified about the synergistic effects of toxic chemical and radioactive waste byproduct releases to the Millstone environment.  
(MS-AL-3)

**Response:** *The comments are related to water quality issues. Water quality, water use, and other water issues were evaluated in the GEIS and determined to be Category 1 issues. The comments provide no significant, new information on water quality; therefore, the comments will not be evaluated further. Water quality will be discussed in Chapters 2 and 4 of the SEIS.*

## **5. Comments Concerning Aquatic Ecology**

**Comment:** ... I was hoping that the present environment could be with the algae surrounding the power plant and other things could be studied more thoroughly in the upcoming weeks and months ahead.

(MS-AC-1)

**Response:** *The comment is related to aquatic ecology issues. Aquatic ecology issues such as stimulation of nuisance organisms, such as algae, were evaluated in the GEIS and determined to be Category 1 issues. The comments provide no significant, new information on aquatic ecology; therefore, the comments will not be evaluated further. Aquatic ecology will be discussed in Chapters 2 and 4 of the SEIS.*

**Comment:** And more recently, we've heard about the depletion of winter flounder and some of the other fisheries with respect to the watershed. And I have been involved in discussions with the Department of Environmental Protection in the State and Dominion in trying to move forward with an appropriate approach to how the reactors are being cooled and its impact on the fisheries. That, I understand, from one of your colleagues has something that has been somewhat unresolved since the late '90s in that is as much as a problem or more of a problem with the state environmental protection and their scheduling.

(MS-C-4)

**Comment:** In the past few years, we haven't been able to go there and that's mainly because there is no fish there anymore. Now the reason for that is because of the cooling system that Millstone uses to cool their reactors. They have an entrainment where they take in millions and millions and billions of little baby fish and whatever else there is and they kill them. The result is we have no fish anymore.

(MS-G-1)

**Comment:** You're really talking about livelihood of people, maybe people's lives or you're talking about some monetary figure that could take care of this whole problem. I think the only way to do this is to shut them down and make them change their system over to a closed system and that would be the only way that I would agree to renewing the permit.

(MS-G-4)

**Comment:** We have both have a lawsuit that's in the works against Millstone against this killing of winter flounder.

(MS-H-1)

**Comment:** We did a test there in the middle of May last year at the peak of the flounder season. We used to do seven bushels there so the tow that we towed, we had seven fish in count. That's not a tribute to the mesh size in the new Federal laws. That's a tribute to the lack of fish there. I'd like to see a closed system go because I want to get to this problem before they are depleted. The way we're going, they will be totally extinct in Niantic Bay. It's not

overfishing. I've heard this for years. And we stopped fishing there approximately seven years ago and it's worse now than it was before. I don't want to hear "all the fishing." I'm sick of it. We get blamed for a lot. We don't do it. It's time that the public realizes that maybe now the Government should start looking at other things besides the fishing, pollution, this hydrazine, everything. ... Let's go to a closed system. The money that it's cost us, the fishermen and resources, that money could have been well spent to put a closed system in.

(MS-H-2)

**Comment:** When Northeast Utilities applied to the NRC, initially to the Atomic Energy Commission, to operate, it made certain predictions of the effects that the operations would have over time in the community but never predicted, at least on paper to the NRC, that it would have the devastating effect that it has had which is to drive the indigenous fish to a point of near extinction.

(MS-I-6)

**Comment:** The outstanding issue on renewal of the discharge permit is not limited to thermal discharge. Although not described in Section 4, the issue of the impact of the plant on the Flounder population is the focus of a disagreement between Dominion Nuclear Connecticut and the Department of Environmental Protection.

(MS-Q-7)

**Comment:** The long-term impacts of discharging two billion gallons of water daily into the Long Island Sound cannot yet be determined and such discharge should cease until a proper and thorough examination of its effects can be measured before the facility is permitted to operate into the future. Such an examination of the power station's impacts should include, but not be limited to, aquatic organisms and the larger marine ecosystem. An analysis must also consider the cumulative impact of the facility upon Long Island.

(MS-AE-2)

**Comment:** The EIS should present a comprehensive evaluation of the impact of Millstone's water intake (used for cooling purposes) from Niantic Bay on both nektonic and planktonic species. As well as a consideration of economically important species (ie. winter flounder), the EIS should assess the mortality of species that support ecosystem functions (i.e. trophic dynamics). Such species may be significant to the life cycle of other economically important species.

(MS-AJ-1)

**Comment:** An evaluation of abiotic and biotic interactions may be appropriate if the water intake results in modification of the hydrodynamics of Niantic Bay.

(MS-AJ-2)

**Comment:** The intake structures of the Millstone reactors are recognized as a significant, if not predominant, contributor to the collapse of the indigenous winter flounder population in the Niantic River-Bay. I encourage you to enquire of the Marine Fisheries Division of the Connecticut Department of Environmental Protection, located in Old Lyme, as to its analysis of this phenomenon.

(MS-AL-2)

**Response:** *The comments are related to aquatic ecology issues. Aquatic ecology will be discussed in Chapters 2 and 4 of the SEIS.*

## **6. Comments Concerning Air Quality**

**Comment:** ... Connecticut and especially, I would venture to say the shore line, Connecticut unfortunately receives the air quality from the Midwest and we don't need fossil fuel plants adding to the problems here in Connecticut in terms of air quality. Nuclear power is a cleaner source of electricity and I would state that it is something that if it is working well, we should continue to promote it here in this region and I believe it is working well.  
(MS-D-5)

**Comment:** Millstone produces all of this electricity using nuclear fuel which does not generate the emissions to the air that are typical to other sources of electricity.  
(MS-T-1)

**Response:** *The comments are related to air quality issues. Air quality issues were evaluated in the GEIS and determined to be Category 1 issues. The comments provide no significant, new information on air quality; therefore, the comments will not be evaluated further.*

## **7. Comments Concerning Socioeconomics**

**Comment:** Dominion has been at the table problem-solving looking for new ways to make this community feel as though they're protected and they're comfortable. They've made huge financial contributions as the Mayor suggested, often times, often times unsolicited with respect to education foundations, the Lion's Club, the children's museum. There's a host of contributions that they've made to improve the quality of life in our region.  
(MS-C-6)

**Response:** *The comment is related to public services impacts in education, social services, and recreation. Public services involving education, social services, and recreation were evaluated in the GEIS and were determined to be Category 1 issues. The comment provides no significant, new information on these public service issues: therefore, the comment will not be evaluated further.*

**Comment:** ... I am here because this plant is a regional asset whose benefits are received by all of us in Southeastern Connecticut and New England for that matter.  
(MS-A-2)

**Comment:** The construction and the operation of this plant have been a huge part of regional economy for more than 40 years and one that we need to protect for the planned license extension of another 20 years.  
(MS-A-3)

**Comment:** I really feel that the business to provide electricity in Southeastern Connecticut is so important because it's such a major part of the State of Connecticut that the economic concerns

that I can draw to right here, as the Mayor of New London also said, is huge to our area as they try their best to support our local businesses with purchases of goods and materials and that their commitment and their word is excellent.

(MS-B-4)

**Comment:** Electricity is becoming a rare commodity and the fact that we have Dominion supplying as much of the electricity as they have has kept our lights on in this state, a case in point in the recent brownouts that were triggered from someplace off in Ohio. We in Southwestern Connecticut lost our lights. We have transmission problems in south and we have congestion problems, but if it weren't for the fact that Dominion was up and generating in a safe manner our lights would have gone down all over the state and we would have been down the sinkhole as much as New York was in.

(MS-C-2)

**Comment:** This plant provides a large part of not only Waterford's tax base - I venture to say less than it did because of the of the electric restructuring, but it also provides to the tax base for the State of Connecticut.

(MS-D-2)

**Comment:** When you look at the fact as was mentioned that more than 45 percent of the electricity that's generated here supports the State of Connecticut, we all know what that means for business.

(MS-D-3)

**Comment:** We cannot forget what an important part of the economy Millstone is.

(MS-D-4)

**Comment:** ... not only contributes to the regional economy, but is a major supplier of power in Connecticut and the Northeast. Dominion Resources through Millstone Power Station is a major employer with over 460 persons employed within Southeastern Connecticut. Additionally, Millstone supports the local economy by purchasing as many goods and services locally as possible. The total economic impact of Millstone Power Station in New London County is estimated to exceed \$500 million.

(MS-E-2)

**Comment:** Renewal of the Millstone operating licenses will continue the benefits our employees provide for our local community. Millstone has approximately 1,300 full-time employees. The annual payroll, including benefits, is over \$150 million. More 250 local contractors work at Millstone and live in our community. During our regularly scheduled refueling outages, the number of contractors increases by about 800. Each reactor is refueled every 18 months. During the past two years, Millstone spent over \$170 million on operations and capital projects, making vital investments in the future of our state.

(MS-F-1)

**Comment:** As our economy and the population grow, reliable sources of electricity including Millstone will be vital to our prosperity and our way of life. License renewal will help ensure Millstone remains available to meet these future needs.

(MS-F-3)

**Comment:** We have incentive within the State of Connecticut to keep the costs of doing business down. Clearly cost effective nuclear power has a role to play in keeping the cost of doing business under control. Our study pointed out, when we looked at production costs for electricity by fuel generation type, that nuclear power was clean. It was safe, and it was the most cost effective alternative. It was 30 percent cheaper than gas, 33 percent cheaper than oil, and actually less than coal without the environmental issues. A key point from our study was that Millstone Station provides cost effective power which in turn is essential to the state's long-term economic competitiveness.  
(MS-J-1)

**Comment:** ... our study concluded that Millstone Station had positive and substantial economic benefits for the local area economy. Our study showed that there were 1,497 direct jobs associated with Millstone Station generating \$231.3 million in annualized direct spending. Accounting for multiplier effects, the level of spending, both direct and indirect, was about \$500 million. So again, looking at these dollar volumes and the jobs generated, the economic impact was substantial and very, very clearly beneficial.  
(MS-J-2)

**Comment:** Our bottom line conclusions were that Millstone Station provides cost effective and reliable electricity to the region's commercial, industrial, and residential users enhancing Connecticut's economic competitiveness.  
(MS-J-3)

**Comment:** Millstone also contributes to the state's economy through direct job creation and spending on goods and services as well as the indirect multiplier effects.  
(MS-J-4)

**Comment:** I cannot emphasize enough the economic importance of importance of Millstone for the town and region. Millstone provides good paying jobs and spends money at local businesses. It pays a very large portion of Waterford's taxes and contributes voluntarily to many community activities and charities. Personal spending by Millstone employees contributes greatly to the economic base of Southeastern Connecticut. In short, Millstone is one of the economic engines that keep our local economy on an upward track.  
(MS-K-2)

**Comment:** The Millstone Nuclear Power Station, worth one percent of the workforce in Southeastern Connecticut, contributes a half a billion dollars to that \$10 billion gross domestic product.... Roughly 1,500 employees are onsite. As has been indicated earlier, to use a conservative multiple, that leads to around 2,500 direct and indirect jobs in Southeastern Connecticut. Roughly two percent of our workforce is in one way, shape, or fashion connected to the Millstone Nuclear Power Station. The pay salaries at the nuclear power station are roughly 50 percent above the average in New London. As far as its expenditure within the region, as far as compensation of employees, it's around \$75 million. If you add to that other parts of the state, you are roughly around \$100 million annually. Direct and indirect compensation, if you want to play the multiple game, you are now talking about probably \$150 million to \$200 million. Millstone Point makes substantial purchases in New London County. In

2001, it bought a quarter of a billion dollars worth of goods and services in Southeastern Connecticut. It pays taxes. It pays a lot of taxes, \$17 million in state and local taxes. Again, if you look at the indirect and direct effects, you are talking about roughly \$60 million in state and local taxes as paid for by the nuclear power station.

(MS-M-2)

**Comment:** Of significance also to the economy of Southeastern Connecticut is the availability of safe and reliable electricity.

(MS-M-3)

**Comment:** And so the availability of safe and reliable nuclear power in Southeastern Connecticut gives us a cost-competitive advantage versus other parts of the state and other parts of the country in maintaining our economy. We support the relicensing of the Millstone Station.

(MS-M-4)

**Comment:** Suffice it to say that Millstone produces the equivalent of approximately 48 percent of the electricity that's used in Connecticut on a daily basis.

(MS-O-1)

**Comment:** I'm wondering if I understand correctly that there will be no major upgrades to the power plant that constitutes "refurbishment." Does this mean that major refurbishments are ongoing or will occur prior to 2015? Do improvements made before relicensing approval require the same level of scrutiny as refurbishments anticipated during the extended license period?

(MS-Q-3)

**Comment:** Page E-4-29 indicates that Dominion Nuclear Connecticut does not anticipate any related tax increase driven changes to off-site land use and development patterns. Well, I am here to say is that the impact of Millstone Point Station on tax revenue, infrastructure installation, and the overall level of service in Waterford is different than any other community in the State of Connecticut.

(MS-Q-8)

**Comment:** Now, on the down side, deregulation has suddenly removed two-thirds of the value of Millstone Point Station. We are left struggling to adjust and maintain a stable community.

(MS-Q-9)

**Comment:** Dominion is a key contributor to the regional and state economy directly employing more than 1,300 persons at the Millstone Station and annually purchasing more than \$68 million in goods and services state-wide.

(MS-S-1)

**Comment:** I can't see how the taxes can go down on Millstone two and three. Unit 1, I can see where they went down because it's no longer in operation. But the value of the plants should be top-notched.

(MS-W-5)

**Comment:** Early today, Don Klepper-Smith, the economist, a very noted economist in the State of Connecticut, was the principal conducting that study and the figure that the overall impact that

Millstone has on the economy of the region is \$500 million. That's a major, major impact. That's includes goods and services purchased as well as personnel.  
(MS-AA-2)

**Comment:** When restructuring occurred, our state legislature through the help of Melodie Peters and Andrea Stillman were very, very generous to the town of Waterford. In fact, they provided a ten year soft landing to the town. I stand corrected, but my memory, I believe, if it serves me correct, the ten years started with the sale of the plant. We got the equivalent the first year of the old assessment, the difference between the old assessment and the new assessment on the tenth year. The ninth year, it went down to 90 percent of that amount. Eighty percent. Seventy percent and it goes out for ten years.  
(MS-AA-3)

**Response:** *The comments are related to the socioeconomic impacts on public services provided by public utilities and on offsite land use. These socioeconomic issues are specific to Millstone, and they will be addressed as Category 2 issues in Chapters 2 and 4 of the SEIS.*

## **8. Comments Concerning Land Use**

**Comment:** Sixth, issues of current land use of the property include a fill pile on Gardener's Wood Road. This pile was determined to contain materials of concern. What will occur with this pile if relicensing is approved?  
(MS-Q-11)

**Response:** *The comment is related to land use. Land use issues are specific to Millstone, and they will be addressed as Category 2 issues in Chapters 2 and 4 of the SEIS.*

## **9. Comments Concerning Human Health**

**Comment:** My first comment has to be directed to the application materials and the assessment that appears to have been undertaken so far by the NRC. It seems to suffer from a major omission. That is, consideration of the biological effects of the ongoing operations of Millstone on the human population. Without even getting into the other aspects of the environment, we know that there has been a very significant effect on the human population in this community over the 34 years that the Millstone Reactors have been in operation. We have heard the business contributions ballyhoo here, but has anybody yet tallied up the enhancements to the health care professions in this industry going to the incidences of devastation and disease, despair brought about to individuals and families through cancer and other illnesses directly attributable, we know, to the routine emissions from Millstone to the air and the water? We know that certain facilities such as the Community Cancer Center are doing well as businesses because of their patient load.  
(MS-I-1)

**Comment:** We know that for our own organization, the Connecticut Coalition Against Millstone, we have suffered devastating losses just in the past year. We do not see any analysis in the present materials that have been submitted as to the deaths and illnesses of workers at Millstone. We have in mind particularly at the moment our wonderful stalwart, a friend and supporter, Joe Besade, who passed away this year. He had a devastating kind of cancer, suffered horribly, and there is every good reason to believe or every bad reason to believe that

he suffered his illness and died because of what he was exposed to when he worked at the Millstone Nuclear Power Station. We don't see that you people have tracked any of the workers at Millstone since 1970 to the present time. What has happened to them? Where are they? Why have so many died prematurely? Why have so many suffered health effects? That's workers.  
(MS-I-2)

**Comment:** Where is the information in this application and the NRC analysis of the human population and the areas around the communities immediately in the shadow of Millstone and even beyond? We know that there are cancer clusters. These have been identified to either side of Millstone and the beautiful areas. Take Millstone out of the picture and go to Jordan Cove and Niantic Bay, and these are some of the prettiest, most seemingly pristine areas of Southeastern Connecticut. They have identified cancer clusters. Go door to door. People have died. People are dying. There is a cancer wave, a cancer epidemic in this community that needs to be analyzed here during this process to determine the effects on the human population from the operations-to-date of Millstone. When the facts come in, there will be no question whatsoever that this plant, this facility must close because of its effect on the human population.  
(MS-I-3)

**Comment:** ... in 1997, the Nuclear Energy Advisory Council commissioned a study looking to the incidence of cancer. It was initiated first because of our other plant down in Haddam. But the data was basically good for Millstone as well because Connecticut is such a small state. The scientists in the State of Connecticut indicated they could see no correlation between the operation of the nuclear plant in Waterford with the incidence of cancer in the State of Connecticut.  
(MS-P-1)

**Comment:** The health of the public has not been considered or I'm not sure if it has at this point, but it must be taken into account. As a mother and a citizen, I know all too often the heartbreaking stories of folks who have died and been stricken with cancers and leukemia. People are dying here and they have illnesses that should not be here. I believe it is caused by radiation.  
(MS-V-4)

**Comment:** I have some information about some of the discharges that come from nuclear power plants. As far as the air, the routine releases, there is no filtering technology that exists for some gases like xenon 135 which decays into cesium 135, an isotope which multiplies, an isotope with a three million year half life. Also routine releases occur into the ocean. Radioactive corrosion products stick to the interior surfaces of the reactor vessels. Some call that radioactive crud. Fission products also enter the cooling water from leaks into the fuel rods. I'm sorry. I'm confused. I'll skip on. There's a maze of more than 50 miles of piping through which cooling water circulates. Leaks are bound to occur. In fact, the Nuclear Regulatory Commission allows leaks of up to 10 gallons a minute and this is a question I have. As nuclear plants age, the leaks generally increase. Also with a nuclear power plant, some of the discharge goes into the water and that, as well, cannot all be filtered. Tritium, for example, cannot be filtered. Tritiated water, a major byproduct of nuclear power plants, can be incorporated into the cells of the body. Some of the hazards resulting from tritium uptake include mutations, tumors

and cell death. Dr. John Gofman, in his most recent report on low dose radiation, says that there is no such thing as a safe dose of radiation and that a low dose received slowly causes as many cancers as the same dose delivered all at once.  
(MS-V-5)

**Comment:** ... while we cannot lower the level of natural radiation, it is my opinion that no one has the right to add manmade radiation on top of it. Any exposure to radiation increases the risk of genetic mutations, cancers and other life-shortening diseases.  
(MS-V-6)

**Comment:** This is a document, "Millstone Power Station" - Dominion took the Nuclear out of its name - "2001 Radioactive Effluent Release Report." You can't see it from where you are, but I have extra copies I'm going to pass out. It shows all the different ways the radioactivity released into the air and into our waters makes its way through the environment, into our food supply, into our bodies and the bodies of other living things.  
(MS-X-2)

**Comment:** Unfortunately, there's all too many stories, but those stories, I would argue, are backed up by a preponderance of evidence indicating that the radioactive releases from Millstone have caused all too many of these diseases and all too many of those kinds of deaths.  
(MS-X-3)

**Comment:** Exhibit A is a report entitled "Elevated Childhood Cancer Incidents Proximate to U.S. Nuclear Power Plants." It's authored by Joseph Mangano and Janet Sherman of the Radiation and Public Health Project in New York City. It appeared in the Archives of Environmental Health in February of 2003. I'll read the abstract brief as follows: "Numerous reports document elevated cancer rates among children living near nuclear facilities in various nations. Little researching has examined U.S. rates near the nations 103 operating reactors. This study determined that cancer instance for children under 10 years of age who live within 30 miles of each of 14 nuclear plants in the Eastern United States exceeds the national average. The excess 12.4 percent risk suggests that one in nine cancers among children who reside near nuclear reactors is linked to radioactive emissions. Instance is particularly elevated for leukemia. Childhood cancer mortality exceeds the national average in seven of the 14 study areas." Of those 14 nuclear plants in the Eastern United States, one of those was Millstone.  
(MS-X-4)

**Comment:** Exhibit B is an excerpt from this document, "Cancer Incidence in Connecticut Counties 1995 by 1999." This is a publication of the Connecticut Tumor Registry. The Connecticut Tumor Registry is the oldest tumor registry in the United States that's been collecting this information since 1935. And keep in mind that our communities have suffered nearly 35 years of nuclear contamination from Millstone since Unit 1 started up in 1970. Looking at the — And also Millstone's radioactive releases are among the highest, if not the highest, of U.S. nuclear power plants. Particularly in the 1970's, the mid '70s, Unit 1 was operating with damaged fuel rods which exacerbated that problem. So we have a cumulative dose to our communities of nearly 35 years now. Looking at the records in more recent years since restart, I've seen that these releases are still continuing. Fortunately, they're not as excessive as they were back in the '70s, but they are still continuing. If you look at the record, the documents closely, you see that for what are called the liquid releases into Long Island Sound and Niantic Bay, each year there are hundreds of what are called batch releases. There are more releases.

If you look at the documents closely, you see that there are identified in Unit 2 and Unit 3 continuous release points. If you look at the total amount of radioactivity that's documented, most of it comes from this continuous release points. So our communities are pretty much on daily basis being subjected to these releases.

(MS-X-5)

**Comment:** Going back to the Connecticut Tumor Registry Report '95 to '99, it reports the incidence of cancers. That is how many people get cancer as differentiated from the mortality, those who contract it who die because fortunately, not everyone who gets it dies. It reports the incidence rate per 100,000 population adjusted for age. ... So for those years in New London County, it's broken down by gender also. For females, New London County was number one among the eight states. Males, we're number two, just barely a little bit lower than Tolland County. There's an early report, 1995 to 1998, in which New London County was number one for both male and female. ... So New London County for the years we're talking about was number one for the following cancers: esophagus for males, colon and rectum for females, colon for females, rectum for females, liver for males, breasts for females, cervix for females, uterus for females, other female genital, females of course, bladder, males, bladder, females, multi-myeloma for females in a tie with Fairfield County. ... Suffice it to say, that the total kind of cancers in which New London County was counted as a separate county because for some of these, it was lumped in with other counties, was a total of 39. Okay. New London County had 12 No. 1s, six No. 2s, five No. 3s and seven No. 4s for a total of 30 out of 39. Not a very good record.

(MS-X-6)

**Comment:** Document No. 3 is called "The Radiation Exposure Compensation Act." In 1990, Congress passed this act saying that people that were downwind of atmospheric nuclear tests in the '50s and '60s in parts of Utah and Nevada and Arizona and also people who worked in uranium mines should be compensated for the damages that they suffered because of those tests that were done in name of national security. It names specific diseases for the downwinders. Those were specified diseases. They're called lymphocytic leukemia, multiple myeloma, lymphomas other than Hodgkin's Disease and primary cancer of the thyroid, breast, esophagus, stomach, pharynx, small intestine, pancreas, bile ducts, gall bladder or liver except cirrhosis or hepatitis B. The reason why I'm bringing this up is because if you look at the breakdown of the specific kinds of cancers in New London County, '95 to '98, pretty much all of those that were named in this 1990 Act of Congress show upon this list. They are caused by ionizing radiation, the kind of radiation that's released from Millstone every day and has been for almost 35 years now.

(MS-X-7)

**Comment:** The final document I'm going to bring up is a summary of a document by Joseph Mangano, who is one of the authors of the first document I've talked about. This was from 1998 and the title of it is "2,500 Excess Cancer Cases in New London County Since 1970: Radioactive Emissions from Millstone May Be The Cause." "About 2500 excess cancers have occurred in New London County since the first Millstone Nuclear Power reactor in Waterford opened in 1970. About 800 of these cases resulted in death, using official figures published by the National Cancer Institute and the Connecticut Tumor Registry." ... "In the '50s and '60s," I'm quoting from the document now, "New London County cancer incidence rate was eight percent below the state average, rising to two percent below from '71 to '84 and 2.5 percent above in '89 to '91." So that goes from eight percent below the state average to 2.5 percent above. "In

Millstone's first 14 years, the county cancer mortality rate was 11 percent above the nation compared to five percent above in the '50s and '60s according the National Cancer Institute. An approximate total 800 additional cancer deaths occurred in the county since Millstone opened." (MS-X-8)

**Comment:** Then Mangano also looks at specific kinds of cancers. For children, leukemia in Millstone's first 14 years, leukemia cases for New London County for children under 10 was 55 percent higher than the state and leukemia deaths 45 percent higher. Again, his source is the National Cancer Institute. (MS-X-9)

**Comment:** For thyroid cancer -- And I should mention that in those worst years of 1970s when Millstone was operating with damaged fuel rods, it was releasing dangerous amounts of radioactive iodine into the air and into the water. So the rate of thyroid cancer in New London County has risen twice as fast as the rest of Connecticut after 1970. Before understanding that, thyroid cancer is normally, if there is such a thing as normal any more, a very rare disease and it predominantly strikes females. For Millstone, about three cases per year were diagnosed in the county. By the early 1990, the number jumped to 17. That's according to Connecticut Tumor Registry. (MS-X-10)

**Comment:** And he also looked at the four towns nearest the reactor, being East Lyme, Groton, Waterford and New London. Females cancers in '89 to '91, cancer cases in these four towns were 15 percent higher than the state tumor registry. Female only cancers were especially high in breast cancer, 20 percent greater than the state. Cervical cancer, 26 percent greater. Ovarian cancer, 35 percent greater and uterine cancer, 29 percent greater. (MS-X-11)

**Comment:** For skin cancer - this is the last thing I'm going to say - malignant myeloma incidence in the four towns in '89 to '90 was 65 percent greater than for the rest of Connecticut. Connecticut Tumor Registry. You might say, "Well we live at the shore. We go to the beach all the time. So that's why." But Mangano took the trouble to look at the rest of the Connecticut coastal towns and found that, yes, their rate was higher than the state also, but it was only seven percent higher compared to ours which was 65 percent higher. (MS-X-12)

**Comment:** I'm going to read you some excerpts from the Nuclear Energy Advisory Council's Report to the Governor and the State Legislature of 2001, "Cancer Risk Study"... "As a result of its findings, the CASE committee concluded that atmospheric emissions from Connecticut Yankee have not had a detectable influence on cancer incident. The committee also concluded that an additional study of this topic is unlikely to produce any positive correlation." ... The committee then performed an analysis to compare the calculated doses with the Connecticut Tumor Registry data. Results of logistic regression analysis comparing these incidents, population counts and estimated exposure levels did not identify meaningful associations among the cancers and the radiation exposures in the towns. In comparison for some tumors, a negative correlation was found. Conclusions. The committee found that exposure to radionuclides emitted from Connecticut Yankee are so low as to be negligible. The committee also found no meaningful associations among the cancers studied, pediatric leukemia, adult chronic leukemia, multiple myeloma and thyroid cancer and the proximity of the Connecticut

Yankee. ... I go back to the NEAC report now. "NEAC initiated this study in request and in response to public concern raised at this meeting. NEAC expressed its sincere appreciation to CASE and its leadership for this important study which clearly demonstrated that nuclear plant emissions had not had a detectable influence on cancer incidence in the State of Connecticut. As the CASE report used data from the Connecticut Tumor Registry, a like study of Millstone emissions would provide a similar result."

(MS-Z-1)

**Comment:** In considering the causes of these cancers, the radioactive releases from Millstone must be included, as the reactors have the highest contribution to manmade radioactive pollution in the county.

(MS-AK-1)

**Comment:** I also encourage you and the NRC staff to investigate the high incidences of ionizing radiation-related cancers and other related diseases in the Millstone vicinity. You are well advised to consult *Millstone and Me* by Michael Steinberg as an introductory source.

(MS-AL-4)

**Response:** *The comments are related to human health issues. Human health issues were evaluated in the GEIS and were determined to be Category 1 issues. However, the comments provided a large amount of information and health statistics related to the area around Millstone, which are being evaluated by the NRC staff to determine if they constitute significant, new information. Human health issues will be addressed Chapter 4 of the SEIS.*

## **10. Comments Concerning Uranium Fuel Cycle and Waste Management**

**Comment:** Nuclear energy is very, very dirty. That's why nobody wants to keep nuclear waste in their backyard. That's why everybody is talking about shipping it out somewhere far, far away. It's probably the dirtiest form of production of energy that can be fathomed. Even in the process of uranium enrichment, there are all kinds of ways in which the air is polluted through generation of fossil power.

(MS-I-7)

**Comment:** Nuclear plants are anything but clean and to say they don't burn fossil fuel, well that really burns me up too. Fossil fuel is used in mining the uranium, processing the uranium into the fuel. Onsite for construction, there's a lot of fossil fuel used. The energy to operate, perhaps they use their own electricity and at some point, we'll be transporting this waste to a final resting place and that will take a good amount of fossil fuel there.

(MS-V-2)

**Comment:** It would seem to me that it's something that could be done in a matter of days, not weeks, if the bureaucracy wanted to get going to figure out whether dry casks are safer than the water pools. It's not secret that the spent-fuel pools are the weak link in the safety of the plants from a terrorist attack standpoint. It would seem to me a no-brainer that dry casks harden, dry cask bunkers are safer and that it could quickly be determined and that everybody whether you're pro or anti-nuclear, whether you're industry or regulatory, we could all agree that this is the cardinal safety issue that needs to be addressed and could be addressed in a matter of months, I would think.

(MS-Y-2)

**Response:** *The comments are related to the uranium fuel cycle and waste management issues. Uranium fuel cycle and waste management issues were evaluated in the GEIS and were determined to be Category 1 issues. The comments provide no significant, new information on these public service issues; therefore, the comments will not be evaluated further.*

## **11. Comments Concerning Postulated Accidents**

**Comment:** I'm looking at Table F.3-2 submitted January 2004 on page E-F-80. This is one page of many that list a number of potential improvements that the company itself believes could enhance safety and operations at Millstone. Let me read one to you. "187, potential improvement, automate start capability of Terry turbine. Discussion, operator fails to start the Terry turbine." Then there's an analysis of what it would cost to make this potential improvement. There is a conclusion that it is not worth the cost. It is not cost beneficial since the cost is greater than twice the benefit. That doesn't sound to me like the company has decided always to go for safety over cost.  
(MS-I-8)

**Response:** *The comment is related to the severe accident mitigation alternatives analysis. This analysis will be discussed in Chapter 5 and Appendix G of the SEIS.*

## **12. Comments Concerning Alternatives**

**Comment:** While the town is continuously concerned about the plant's impacts on the fisheries of Long Island Sound, the installation of cooling towers on this site has broad aesthetic as well as land use implications.  
(MS-Q-5)

**Comment:** I would like to conclude by saying it's time to consider phasing out these plants and move ahead with combinations of conservation and alternative energies such as gas, wind and solar technologies which are moving forward.  
(MS-V-7)

**Comment:** ... the biggest problem is there are alternative methods out there and we do not need an energy to produce electricity.  
(MS-W-1)

**Comment:** They've had co-generation plants start up that's helped produced just as much power as Unit 3 and there's more and more.  
(MS-W-2)

**Comment:** We can diversify our energy. We can't depend on nuclear. We can't depend on oil.  
(MS-W-8)

**Response:** *The comments are related to the environmental impacts of alternatives to license renewal at Millstone. The GEIS included an extensive discussion of alternative energy sources. Environmental impacts associated with various reasonable alternatives to renewal of the operating licenses for Millstone will be evaluated in Chapter 8 of the SEIS.*

## **13. Comments Concerning Issues Outside the Scope of License Renewal**

## **Safeguards, Security, and Terrorism**

**Comment:** We believe that this is an extremely safe operating plant and are very involved in the security aspect, especially since the 9/11 tragedy brought us closer together and the importance of working closer together.

(MS-B-1)

**Comment:** But the plant has always been secure with respect to comings and goings, but since 9/11, the Dominion Corporation has made it a point to step above to assure that we have a secure environment, so not only before, during and after they have with all the Federal alerts and levels that we have, they respond.

(MS-C-3)

**Comment:** I do not see that there has been any analysis of the potential for catastrophic, environmental horrors which will occur should Millstone actually become the target of malevolent forces.

(MS-I-4)

**Comment:** ... I speak to provide the following comments to help the Nuclear Regulatory Commission identify the significant positive interaction between Connecticut's law enforcement and emergency response officials and the staff of Dominion Corporation in matters related to the safe and secure operation of Millstone Power Station.

(MS-L-1)

**Comment:** Military Department personnel have worked with Dominion personnel at all levels, from the security guard to director, from a private to a general with a common goal of enhancing and ensuring the safe and secure operation of MPS.

(MS-L-2)

**Comment:** "Operation Holiday Shield" provides an example of Connecticut's commitment to MPS. As a result of the elevation of the Homeland Security Advisory System to orange, on December 21, 2003, I, after consulting with Dominion Corporation officials, ordered the QRF to deploy to MPS. The QRF coordinated the operation with the supported contract security, Connecticut State Police, Waterford and East Lyme Police, the Coast Guard and the Connecticut Department of Environmental Protection.

(MS-L-3)

**Comment:** The Connecticut National Guard's Director of Military Support conducts monthly meetings with Dominion Corporation to coordinate preparation for potential deployment of the SRF and the QRF to MPS. At the meetings, military personnel discuss specific security concerns with the median emergency planners and security managers, representatives from the FBI, the State Department of Environmental Protection, the Connecticut State Police, and Waterford Police Department.

(MS-L-4)

**Comment:** OEM works with Dominion to hold law enforcement meetings relative to security on site. Connecticut state police, Dominion security, and local enforcement meet to discuss coordination issues relative to on scene response and protection.  
(MS-L-8)

**Comment:** I am confident that Dominion and Connecticut maintain all the necessary and proper personnel, equipment, and measures to guarantee and facilitate Connecticut's public safety as it relates to MPS.  
(MS-L-11)

**Comment:** Fifth, the impact of the implementation of additional security - although I have heard and I understand that that's outside the relicensing process - is not assessed in the application nor is the potential for a terrorist attack that would result in a severe accident. So as a derivative of the question I heard a gentleman ask earlier, will the NRC consider these changes?  
(MS-Q-10)

**Response:** *The comments are related to security and terrorism.*

*The Commission has determined that issues related to terrorism are beyond the scope of the NRC staff's safety review under the Atomic Energy Act. NRC and other Federal agencies have heightened vigilance and implemented initiatives to evaluate and respond to possible threats posed by terrorists, including the use of aircraft against commercial nuclear power plants and ISFSIs. In addition, the Commission has determined that malevolent acts remain speculative and beyond the scope of a NEPA review. NRC routinely assesses threats and other information provided to it by other Federal agencies and sources. NRC also ensures that licensees meet appropriate security levels. NRC will continue to focus on prevention of terrorist acts for all nuclear facilities.*

*The NRC has taken a number of actions to respond to the events of September 11, 2001, and plans to take additional measures. However, the issue of security and acts of terrorism at nuclear power plants is not unique to facilities that have requested a renewal to their license; therefore, security and terrorism will not be addressed within the scope of this SEIS. The comments did not provide significant, new information and do not fall within the scope of license renewals set forth in 10 CFR Parts 51 and 54; therefore, they will not be evaluated further.*

### **Emergency Response and Preparedness**

**Comment:** We interact with them in emergency planning exercises and on issues of concern at the plant itself. Communications are excellent. There are regular meetings with community leaders to update us on issues at Millstone and the dissemination of emergency information occurs immediately and there is every attempt to provide information to us in advance of any non-routine activity.  
(MS-E-3)

**Comment:** At the quarterly meetings, OEM, Federal Emergency Management Agency, FEMA Region I, Dominion, and the local emergency managers, and the Emergency Planning Zone, EPZ, discuss topics relative to MPS.  
(MS-L-5)

**Comment:** OEM coordinates and participates in emergency planning activities with MPS and emergency response personnel. OEM conducts two full scale emergency drills with the local municipalities, Dominion, FEMA Region, and the state and Federal emergency response agencies designated to response to an MPS radiological event factoring in variables such as meteorological conditions and evaluation routing.  
(MS-L-6)

**Comment:** This September, we will conduct a FEMA evaluated ingestion pathway exercise evaluating the ability to assess and mitigate radiological contamination resulting from an MPS radiological emergency. We do those drills annually.  
(MS-L-7)

**Comment:** Based upon the Nuclear Regulatory Commission's Regulatory Issue Summary 2002-21, National Guard and other emergency responders located in the licensee's control area executed an agreement to coordinate MPS contingency plans and procedures involving the deployment of security and emergency response personnel and equipment to MPS.  
(MS-L-9)

**Comment:** The relationship between Connecticut's emergency response community and MPS is direct, well-established, and often exercised. MPS employs quality personnel to staff their security and emergency planning operations which is more than adequate for the safe and secure operations during normal conditions.  
(MS-L-10)

**Comment:** I think the situation, the capability of evacuating the area, is very important. Well, it's important to all of us. We live here and it's probably the most important thing that should be studied in the event of a nuclear accident, but also before any renewal is granted, it should be studied as if this was a new plant being built and there should be complete traffic control studies.  
(MS-U-1)

**Comment:** My problem, ... is with the notion of evacuation, the idea of taking everybody in the area and putting them in an unsealed vehicle right at the point, right at the time of maximum concentration of airborne nuclides is ridiculous. I think it's one of education which will help prevent panic. I know personally. You're not going to put me in an unsealed vehicle. I'm going to go home in sealed room with either wet towels over my mouth and nose or a respirator. I'm going to prevent the inhalation which is the big problem. I think the NRC -- I know this is not going to be -- This is getting a feel from the EIS, but I think the NRC needs to rethink its whole evacuation scheme.  
(MS-Y-3)

**Comment:** I echo the comments earlier regarding the 100,000 people that could get out of New London in the middle of the night when there's a major event.  
(MS-AD-1)

**Comment:** "Due to the proximity of the Millstone Nuclear Power Station to Long Island, I have fought vigorously to include Long Island in the emergency planning zone for the Millstone Plant."  
(MS-AE-1)

**Comment:** In case of an accident it would be impossible to evacuate the Eastern End of Long Island.  
(MS-AF-2)

**Comment:** All are aware that those of us on the North and South Forks of Long Island have no evacuation possibilities in case of a nuclear disaster.  
(MS-AG-2)

**Comment:** I have two primary areas of concern: 1) the security of the facility against terrorist attack, and 2) the evacuation plan in the event of a radiation release.  
(MS-AI-1)

**Response:** *The comments are related to emergency preparedness. Emergency preparedness is an ongoing process at all plants, including Millstone. Each nuclear plant must have an approved emergency plan, as required by 10 CFR Part 50, that is revised periodically and required to be updated. Licensees are required to frequently test the effectiveness of the plans by conducting emergency response exercises. Emergency planning is part of the current operating license and is outside the scope of the environmental analysis for license renewal. The comments did not provide significant, new information and do not fall within the scope of license renewal as set in 10 CFR Parts 51 and 54; therefore, the comments will not be evaluated further.*

### **Operational Safety**

**Comment:** I have a statement actually in the form of question. In 1997 when they were shut down, each plant had thousands and thousands of things that were supposed to be fixed. As far as I know, this is 2004. A lot of those things still haven't been fixed.  
(MS-W-4)

**Comment:** I'm sure many people do have an idea here why Millstone 1 is no longer operating, but I think that should be addressed in the EIS.  
(MS-Y-1)

**Response:** *The comments are related to operational safety. Operational safety is outside the scope of the environmental review. An NRC safety review for the license renewal period is conducted separately. Although a topic may not be within the scope of review for license renewal, NRC is always concerned with protecting health and safety. Any matter potentially affecting safety can be addressed under processes currently available for existing operating licenses. The comments did not provide significant, new information and do not fall within the scope of the license renewal as set in 10 CFR Part 51; therefore, the comments will not be evaluated further.*

## **Summary**

The preparation of the plant-specific supplement to the GEIS (called a SEIS) for the Millstone Power Station, Units 2 and 3, will take into account all the relevant environmental issues raised during the scoping process that are described above. The draft SEIS will be made available for public comment. Interested Federal, State, and local government agencies, local organizations, and members of the public will be given the opportunity to provide comments to be considered during the development of the final SEIS.

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