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**From:** "Merrily Gere" <merrily.gere@po.state.ct.us>  
**To:** <MillstoneEIS@nrc.gov>  
**Date:** Tue, Mar 8, 2005 9:45 AM  
**Subject:** Comments of Connecticut DEP on Document NUREG-1437, Supplement22

Attached please find the comments of the Connecticut Department of Environmental Protection Bureau of Air Management on the Draft Generic Impact Statement for the License Renewal of the Millstone Power Station Units 2 and 3 (NUREG-1437, Supplement 22). These comments will also arrive by U.S. mail.

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VIA ELECTRONIC AND REGULAR MAIL

March 2, 2005

Chief, Rules and Directives Branch  
U.S. Nuclear Regulatory Commission  
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Re: *Comments of the Connecticut Department of Environmental Protection –  
Bureau of Air Management --  
Draft Generic Impact Statement for License Renewal of Nuclear Plants Regarding  
Millstone Power Station, Units 2 and 3  
NUREG-1437, Supplement 22*

To the Chief of the Rules and Directive Branch:

The Connecticut Department of Environmental Protection Bureau of Air Management (the Bureau) submits these comments on the U.S. Nuclear Regulatory Commission's (NRC's) *Draft Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding Millstone Power Station, Units 2 and 3* (Draft EIS). The Draft EIS discusses the environmental impacts of the proposal to renew the operating licenses for Units 2 and 3 of the Millstone Power Station, including the alternatives to license renewal. The Bureau has considered the alternatives presented in the Draft EIS and is concerned that any fossil-fueled alternative electricity supply will have negative air quality impacts as compared to re-licensing the Millstone units.

If the license for the Millstone units is not renewed, additional fossil-fueled generation would likely be necessary to meet the state demand for electricity, as an alternative consisting only of demand reduction, energy efficiency and alternative energy sources is not feasible in the given timeframe. Moreover, the Connecticut Energy Advisory Board's 2004 energy plan specifically identified the inadequacy of the State's transmission infrastructure. Failure to re-license units 2 and 3 will further exacerbate this problem. The Bureau supports the use of clean alternative energy sources and measures that reduce electricity demand. However, the Bureau recognizes that such measures require immediate and substantial changes in behavior with regard to energy use, a substantial investment in low- and no-emitting resources and large-scale implementation of energy conservation and load reduction measures by residential and industrial energy users. Such changes can only occur over a longer timeframe than that allowed by denial of the license renewal.

The air quality impact of replacing the electricity generated by the Millstone units with electricity generation by large-scale fossil-fueled electric generators is substantial. As the Draft EIS identifies, emissions of nitrogen oxides (NOx), sulfur oxides, carbon monoxide, particulate

matter and hazardous air pollutants would increase. Increased NO<sub>x</sub> emissions are a particular

Chief, Rules and Directives Branch  
Page 2

concern to the Bureau since reductions in emissions of ozone precursors are of immediate importance to Connecticut's strategy to attain and maintain the national ambient air quality standards (NAAQS) for ozone. In order to attain the new 8-hour ozone NAAQS statewide by 2010, as required by the U.S. Environmental Protection Agency (EPA), Connecticut is now in the process of identifying additional reductions that may be obtained from a variety of sources in the state. Furthermore, the same assessment is underway for fine particulate matter, in order to comply with EPA's designations under the NAAQS for particulate matter less than 2.5 microns in diameter.

The Bureau appreciates the opportunity to submit these comments and will be glad to provide any additional information that you may require.

Sincerely,

/s/Anne R. Gobin, Chief  
Bureau of Air Management

ARG/MAG/mag