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UNITED STATES OF AMERICA
NUCLEAR REGUATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	:	Docket Nos. 50-336-LR 50-423-LR
Dominion Nuclear Connecticut, Inc.:	:	ASLBO No. 824-01-LR
(Millstone Nuclear Power Station, Units 2 and 3)	:	April 12, 2005

NOTICE OF IMPENDING MOTION TO REOPEN

The Connecticut Coalition Against Millstone ("Coalition") herewith serves notice of its impending filing of a motion to reopen these proceedings based upon grave and significant issues of health and safety which have recently come to the attention of the Coalition.10 CFR 2.326.

Such issues include but are not limited to the following:

1. The case of Zachary M. Hartley, age 7 years.

Zachary was born on December 16, 1997 with a rare jawbone cancer. His jawbone and a tumor the size of an orange were removed from his face during epic, life-saving surgery when he was 14 months of age. Zachary's mother regularly swam at the Hole-in-the-Wall Beach on Niantic Bay in East Lyme, Connecticut during critical months of her pregnancy. The Hole-in-the-Wall Beach is located within the 8,000-foot nuclear/toxic/thermal "mixing zone" for Millstone Nuclear Power Station ("Millstone") discharges as identified in the federal Clean Water Act permit pursuant to which Millstone operates, which permit expired in 1997. A fish, contaminated with cesium-137 released by Millstone, was caught midway between the Millstone discharge point and Hole-in-the-Wall Beach in

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1997, according to reports filed by Millstone's then-owner and operator with the U.S. Nuclear Regulatory Commission ("NRC"). Zachary's face is disfigured. Surgeons did not remove all the affected tumor from Zachary's face because of the overwhelming medical risk presented. Zachary is under continuous medical surveillance. Dr. Helen Caldicott, world-renowned pediatrician, co-founder of Physicians for Social Responsibility and authority on the health effects of exposure to low-level ionizing radiation, reviewed Zachary's medical records and on March 10, 2005 publicly opined the strong probability that Millstone effluents were a causative factor in Zachary's case. Zachary's parents believe that Millstone effluent discharges are responsible for Zachary's affliction.

2. **Elevated concentrations of strontium-90 in goat milk sampled five miles north-northeast of Millstone during the years 2001, 2002 and 2003.**

Dominion Nuclear Connecticut, Inc. ("Dominion"), current owner and operator of Millstone, reported a finding of a concentration of 55 picocuries/liter in goat milk sampled five miles north-northeast of Millstone in 2001. This level is nearly twice the level of strontium-90 found in milk produced in Connecticut during the peak of atmospheric nuclear weapons testing in the 1960s. Other measurements of goat-milk concentrations of strontium-90 near Millstone have been highly elevated. The facts raise the specter that Millstone has been operating outside federal radiation dose requirements.[1]

3. **Heightened cancer incidence in Waterford.**

[1] Please see the Coalition's March 2, 2005 submission to the NRC environmental review team assigned to the Millstone relicensing application, attached.

Preliminary results of a health survey in Waterford, Connecticut reveal seven (7) known incidences of cancer among 30 households on one street – Seabreeze Drive – located less than two miles downwind from Millstone.

This cancer rate – 23% - exceeds national norms.

4. Degraded Conditions at Millstone

During 2004, Millstone operations were characterized by repeated violations of Technical Specifications, cost-cutting measures which jeopardized public health and safety, equipment degradation and operational errors which resulted from operator unfamiliarity with basic nuclear reactor systems, according to NRC inspection reports. Two weeks after an NRC inspection team inspected the Unit 2 turbine building to evaluate its fire protection system, a fire broke out in the Unit 2 turbine building which cascaded into a site emergency which disabled perimeter and interior security and drove Dominion to order a sitewide evacuation of all non-emergency personnel. Despite all these troubling facts and circumstances, and others, the NRC inspectors pronounced that Millstone performance in 2004 was so positive that the NRC would reduce its inspections through the year 2006.[2]

5. Unit 1 spent fuel pool vulnerability

The National Academy of Sciences ("NAS") has recently identified elevated spent fuel pools – such as serves Millstone Unit 1 – to be particularly vulnerable to terrorist attack and the consequent threat of devastating fire and dispersal of radiation. The NAS report is highly critical of spent nuclear waste storage in

[2] Please see "Expose of Degraded Conditions," compiled by the Coalition from NRC inspection reports, attached.

spent fuel pools, such as are present at Millstone Units 2 and 3, which have been approved by the NRC for multiple re-rackings and high-density storage.[3] Recent news accounts suggest that the NRC improperly suppressed the public version of the document. The NAS report raises the prospect that major refurbishment will be required at Millstone Units 1, 2 and 3 to accomplish recommended objectives of both the NAS and the NRC.

6. Undisclosed refurbishment

The Connecticut Department of Environmental Protection is expected to order Dominion to convert from the present "once-through" cooling system to a closed cooling system during prospective proceedings for "renewal" of the Clean Water Act permit to eliminate discharges of radioactive and toxic waste effluents to the Long Island Sound and to eliminate entrainment of marine species at the intake structures, which entrainment has driven indigenous fishing stocks to near-extinction. Dominion did not identify this major anticipated refurbishment in its relicensing application and it was not previously reviewed.

7. Relaxed surveillance and waivers of safety standards.

Since Dominion assumed ownership of Millstone, it has sought and obtained from the NRC reduction and elimination of safety standards. Surveillance intervals have lengthened. Presently pending license amendment applications are particularly threatening to public health and safety.

8. Advisory Council on Reactor Safeguards proceedings.

[3] The NAS report will be submitted in the prospective filing.

Numerous issues related to aging of Millstone systems and components were exposed and left unresolved during proceedings before the Advisory Council on Reactor Safeguards on April 6, 2005.

The Coalition hereby serves notice that it will address each of the above-identified issues, which have recently come to light, and others, in a forthcoming motion to be supported by all appropriate affidavits and documentation.

CONNECTICUT COALITION AGAINST MILLSTONE

By: 

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CONNECTICUT COALITION AGAINST MILLSTONE

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March 2, 2005

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Re: Millstone Nuclear Power Station/Draft Environmental Impact Statement

Dear Sirs:

The Connecticut Coalition Against Millstone submits herewith preliminary comments concerning the draft Environmental Impact Statement (EIS) which the NRC staff has prepared in support of relicensing of Millstone nuclear reactors Units 2 and 3 to extend their terms to the years 2035 and 2045 respectively. These comments will be supplemented with a separate filing with attachments.

The Coalition strongly opposes Millstone relicensing.

The data available to the U.S. Nuclear Regulatory Commission in its environmental review establishes a clear link between Millstone's radiological and chemical discharges to the environment and **major health effects** in the surrounding community.

The data reviewed by the NRC is alarming.

The data strongly suggests – and indeed does so almost to a certainty – that Dominion Nuclear Connecticut, Inc. is operating and will continue to operate the Millstone Nuclear Power Station in violation of NRC regulations requiring limiting doses to the public of 15 millirems per year to any organ.

Put another way, the data strongly suggests that Dominion's Millstone daily operations exceed the permissible dose of radiation to the public and will continue to do so during the proposed relicensing period.

Based on Dominion's own reporting of radiation sampling in the environment, the Coalition believes the available data reviewed by the NRC for the years 2001, 2002 and 2003 prove that routine operations of Millstone are in violation of federal health standards and are illegal.

By its own admission, the NRC confined its review of Millstone radiological releases, for Environmental Impact Statement purposes, to the years 2001, 2002 and 2003. ("Radioactive Waste Management Systems and Effluent Control Systems 2.1.4," DEIS at 2-9) (No explanation is provided in the DEIS as to why the years 1970-2000 and the year 2004 – with the most current data – were excluded from review.)

The Annual Radiological Environmental Operating Report submitted by Dominion Nuclear Connecticut, Inc. to the NRC for the year 2001 – one of the few reports the NRC specifically identified that it had reviewed in its EIS procedure - contains the following information:

> On September 19, 2001, a concentration of strontium-90 of 55.5 picoCuries per liter (pCi/l) was measured in a sample of goat milk taken from a location 5.5 miles north-northeast of the Millstone Nuclear Power Station. The uncertainty factor reported was plus or minus 5.3 pCi/L.

A concentration of 55.5 picoCuries per liter is an "extremely large concentration, close to twice the highest concentration measured in Connecticut pooled milk at the height of nuclear weapons testing in 1963 of 23 pCi/L," according to a report dated March 1, 2005 by Dr. Ernest J. Sternglass, Professor Emeritus of Radiological Physics at the University of Pittsburgh School of Medicine and an acknowledged pioneer in the field of the effects of low-level ionizing radiation on living cells. The report appears annexed hereto as Exhibit A.

Moreover, according to Dr. Sternglass, since the measured value is ten times as large as the measurement uncertainty, "this is an extremely significant result, with an astronomically small chance that it is a statistical fluctuation."

Put into perspective, an individual drinking two eight-ounce glasses of the strontium-90-contaminated goat milk on a daily basis would receive a maximum permissible dose of radiation – under NRC guidelines – within 30 days.

This assumes no other radiological contamination of the milk. However, strontium-90 never appears alone in the environment. When the radiological effects of identified concentrations of radionuclides also reported in the same goat milk sample - cesium-134, cesium-137, iodine-131, barium-140 and others – are considered, the effect is even more damaging and far less milk would need to be consumed over fewer days before the maximum permissible radiation doses established by federal law would be exceeded, according to Dr. Sternglass.

"The dose to bone or the bone marrow when other fission products are present is some 5 to 6 times greater than from strontium-90 alone, and the Dominion reports for goat milk show significant concentrations of other fission products, such as cesium-137, in significant concentrations," Dr. Sternglass states in his report, Exhibit A.

"Using the NRC NUREG 1.109 dose factor of 0.0172 mrem/pCi/l [millirem] from Table A-5, a mere 2.4 pCi/l daily intake results in the maximum permissible dose to any organ of 15 mrem per year set by NRC guidelines, 23 times the amount measured in a single liter," according to the Sternglass report.

Attached to Dr. Sternglass' report are measurements, reported to the NRC by Dominion, of strontium-90 in goat milk sampled at locations within 5 miles of Millstone during the years 2001, 2002 and 2003.

The reported samples of measurements show concentrations of 13 to 14 pCi/l on other days during the three-year period. According to Dr. Sternglass, these are also significantly high readings since strontium-90, concentrating in milk due to atmospheric nuclear weapons testing which ended in 1980, has declined to less than 1 pCi/l in areas far removed from any nuclear reactors.

Since the samples are collected by Dominion only twice a month, it is unknown whether actual concentrations on other days exceeded the levels reported.

In 1997, Millstone's previous owner, Northeast Utilities, persuaded the NRC to permit it to discontinue sampling for strontium-90 in its air filter monitoring program. As the 1997 Annual Radiological Environmental Operating report states:

> Section 4.5 Air Particulate Strontium (Table 5)
> Table 5 in past years was used to report the measurement of Sr-89 and Sr-90 in quarterly composited air particulate filters. These measurements are not required by the Radiological Effluent Monitoring Manual (REMM) and have been discontinued. Previous data has shown the lack of detectable station activity in this media. This fact, and the fact that milk samples are a much more sensitive indicator of fission product existence in the environment, prompted the decision for discontinuation. In the event of widespread plant related contamination or special events such as the Chernobyl incident, these measurements may be made.

Strontium-90 is among the most deadly byproducts of nuclear fission. Once ingested, its highly-energetic electrons damage and cause mutations in nearby cells. Exposure to low levels of strontium-90 and other bone-seeking radioactive chemicals routinely released by nuclear power plants does not merely increase the risk of bone cancer or leukemia, but it weakens the immune defenses provided by the white cells of the blood that originate in the bone marrow. See Declaration of Ernest J. Sternglass (August 8, 2004) submitted to the NRC in In the Matter of Dominion Nuclear Connecticut, Inc., Docket No. 50-336-LR, 50-423-LR, ASLBP No. 04-824-01-LR, annexed hereto as Exhibit B.

"As recently shown in the 2003 report by the European Committee on Radiation Risk, numerous epidemiological and laboratory studies have shown that the risk of cancer and other diseases produced by local internal doses to critical organs from fission products that are inhaled or ingested have been underestimated by extrapolation from high external doses by factors of hundreds to thousand of times," according to the Sternglass report, Exhibit A.

"This explains why it now appears that releases from nuclear plants, often acting synergistically with other environmental pollutants, are a major neglected reason for the recent rise of illness and deaths both among newborns and the elderly observed in the U.S. in the last two decades, as also discussed in the ECRR report," according to Dr. Sternglass. Id.

"For these reasons, it is my professional opinion that the Millstone Nuclear Plant should not be relicensed," Dr. Sternglass stated. In his report, Exhibit A.

The Coalition has previously submitted, in these and the related Atomic Safety and Licensing Board proceedings, documentation from Joseph Mangano and Michael Steinberg which links the Millstone radiological effluent releases – including strontium-90 - to significant negative health consequences in the community. These documents are incorporated by reference herein.

CONNECTICUT COALITION AGAINST MILLSTONE

/s/

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Millstone-2004:
Expose of Degrading Conditions

During the year 2004, Dominion routinely violated its licensing conditions at its Unit 2 and Unit 3 nuclear reactors, cut corners on safety, misled the U.S. Nuclear Regulatory Commission and exposed the State of Connecticut to a heightened risk of nuclear oblivion.

There is a rational response to this fiasco: MOTHBALL MILLSTONE NOW! Close the plant, move the deadly tons of intensely radioactive waste to safe onsite storage – in dispersed underground bunkers – and convert the site to wind, solar and wavepower generation of electricity.

Below we list many – by no means all – examples of serious errors and degrading conditions which occurred in 2004 and which your government at every level tolerated. Any one of these conditions, combined with others, could have contributed to a serious accident or worse. Your public officials compromised your safety and your future. Call them, email them, write to them. Wake them up! Contact numbers and email addresses appear at the bottom of this item.

Unit 2

Millstone Unit 2 is a 870-megawatt nuclear reactor which went online in 1975. It has one of the worst operational records in the entire U.S. nuclear industry. The NRC ordered it shut down for three years (1996-1999) because it was so unsafe. Connecticut's Department of Public Utility Control declared it "no longer used and useful" in 1998. Unit 2 produces excess electricity which is not needed by Connecticut consumers. Yet, one of former Governor John G. Rowland's dubious achievements before he pleaded guilty to federal corruption charges was to return Unit 2 to service and keep it operating.

These events occurred at Millstone Unit 2 in 2004:

- A spent nuclear fuel rod *broke* at Unit 2 on August 5 while operators were inspecting fuel assembly failures. The lethal rod

fragmented and it took a week for Dominion to recover all the pieces.

- Unit 2's reactor trip breaker failed to shut remotely. This is alarming, given Unit 2's unusual propensity to suffer unexpected and dangerous spontaneous "trips" or shutdowns.
- Unit 2 suffered four reactor "trips" during the inspection period due to equipment failures or personnel error.
- Dominion allowed Millstone's "high-range" radiation monitor – key to measuring radiation doses to the public – to become seriously degraded.
- Atmospheric relief "housekeeping boots" ruptured with potential to interfere with operability of the enclosure building filtration system.
- On April 14, workers discovered that a fuel assembly "had moved several inches upon coming out of the core and would not travel into the mast without causing an overload condition."
- Unit 2 used materials from an unqualified vendor.
- A reactor trip breaker failed to shut.
- The spent fuel pool ventilation system was allowed to become degraded.
- Inspectors discovered a critical modification was made to the spent fuel pool water level indicator without documentation.
- A loss of shutdown cooling occurred, resulting in an uncontrolled reactor coolant system temperature increase of 14 degrees Fahrenheit.
- Dominion repeatedly violated Technical Specifications (its formal licensing conditions) throughout 2004. These "Tech Specs" are legal requirements the public has a right to expect will be carried out and enforced.
- During two unplanned emergency shutdowns, safety valves failed to operate properly and Dominion failed to correct long-standing repetitive failures of these safety valves. The NRC called this failure "more than minor" because it undermined plant stability.
- The emergency diesel generator was allowed to develop a "through-wall" leak.
- Dominion failed to follow procedures to properly test pressurizer level control circuitry only when Unit 2 was in shutdown, resulting in the inadvertent startup of both standby

charging pumps with one charging pump running. The NRC found "neither operators nor instrumentation and calibration personnel identified these procedure requirements prior to the conduct of testing." As a result, both "redundant" safety systems were adversely affected, causing a significant pressure rise in the system which nearly exceeded the maximum pressure allowable on the relief valve system.

- The emergency building filtration system was allowed to degrade.
- Multiple bolt failure due to corrosion buildup disabled one of two primary circulating water pumps while Unit 2 was at full power on June 10.
- On June 18, a reactor coolant pump system malfunction was brought about by the failure of a pressure transmitter.
- Water was discovered in charging pump oil.
- A procedure to test the main steam code safety valve was not independently reviewed by Dominion and supporting documentation was not available to NRC inspectors.
- Degraded conditions were found in the Emergency Building filtration system.
- A "C" service water pump failed a testing program.
- A turbine trip hook malfunctioned.
- A flood door separately emergency diesel generators was left open in violation of procedures.
- Dominion violated its Technical Specifications when it failed to adequately implement post-maintenance testing of a critical pressurizer level instrument; a similar failure was a precursor to the failure to the charging system on March 7, 2003.
- Inspectors discovered that modifications to Unit 2's charging system were not supported by calculations or test data.
- The post-incident recirculation fan timer failed.
- Dominion's failure to properly employ engineering controls led to two workers who handled contaminated air filters to suffer serious radiation exposures from "significant elevated airborne radioactivity concentrations" in the work area on September 29.
- Combustion gas leaked into the emergency diesel generator water system.
- Dominion failed to follow procedures for ventilation function in the switchgear room.

- Unit 2 suffered "excessive leakage" in the radioactive cooling system because of a pump failure.
- The Unit 2 intake structures suffered degrading conditions on November 5, potentially jeopardizing the critical reactor cooling system, due to high winds and high seas.
- Operators did not recognize the significance of several steam generator code "safeties" that had lifted subsequent to reactor trips at Unit 2.
- Operators and engineers at Unit 2 determined compensatory cooling measures installed in a direct current switchgear room at Unit 2 would ensure the availability of the switchgear, while existing technical evaluations stated just the opposite.

Unit 3

Millstone Unit 3 is a 1,150-megawatt nuclear reactor which went online in 1986. It, too, has one of the worst operational records in the entire U.S. nuclear industry. The NRC ordered it shut down for two years (1996-1998) and put it on its notorious "Watch List" because it was so unsafe.

These events occurred at Millstone Unit 3 in 2004:

- During a draindown of the vital reactor coolant system at Unit 3, the worker assigned to monitoring the refuel pool level left his assignment before completion; the reactor coolant draindown continued in his absence for 1.5 hours. Operators were left to rely on the remote camera indication of the refuel pool level – and they read it incorrectly. The NRC correctly called this safety breach "more than minor" because it "affected the likelihood of causing a loss of reactor water inventory to the point that shutdown cooling could be lost."
- Millstone Unit 3 suffered repetitive failures of leakage tests for vital water systems. Over a span of eight years – including three years of Dominion operations – the same known failure mechanism resulted in a 50 per cent failure rate for critical check valves.
- Dominion allowed Millstone's "high-range" radiation monitor – key to measuring radiation doses to the public – to become seriously degraded.

- On April 4, while Dominion was preparing to remove the reactor vessel head at Unit 3, an overhead crane malfunctioned, causing significant damage to a critical lifting rig and damaging personnel safety equipment.
- On April 14, workers discovered that a fuel assembly "had moved several inches upon coming out of the core and would not travel into the mast without causing an overload condition."
- Dominion repeatedly violated Technical Specifications (its formal licensing conditions) throughout 2004. These "Tech Specs" are legal requirements the public has a right to expect will be carried out and enforced.
- An emergency diesel generator output breaker malfunctioned.
- A valve failure led to a high steam flow transient which led to a secondary transient.
- An error occurred in the steam generator flow, leading to alarm response procedures.
- "Excessive" gas vented from the reactor heat removal system.
- Leakage developed in a cooling water system relief valve.
- An emergency diesel generator output breaker malfunctioned.
- Serious discrepancies were noted in systems monitoring control rod positioning.
- NRC inspectors discovered boric-acid buildup on the Unit 3 reactor vessel head worse than what was reported by Dominion.
- Dominion violated the Technical Specifications by failing to properly vent the reactor coolant system and the residual heat removal system. The NRC said the violation was "more than minor" because it had potential to render vital charging pumps inoperable in an emergency.
- Dominion violated its Technical Specifications when an electrical system failure required it to stop reactivity additions to the Unit 3 nuclear reactor; contrarily, operators increased reactivity and heat buildup. The NRC Dominion's failure to cease the reactivity addition with a degraded electrical configuration was a "performance deficiency."
- Operators did not recognize that a failure of a vital inverter made the electrical train inoperable.
- Operators did not understand the potential significance of air found in the discharge piping of the RHR (residual heat

removal) system at Unit 3 and their evaluation was not technically supported.
- Operators did not adequately consider the effects of small oil leaks on high head safety injection pumps at Unit 3.

The NRC, in a scathing inspection report, concluded that Dominion failed to address degraded conditions at Millstone in 2004.

The NRC inspectors "found a lack of rigor by Dominion related to both the understanding of the effects of degraded conditions and the technical bases used to evaluate degraded conditions . . . resulting in violations [of Millstone's licensing requirements]."

The blistering NRC inspection reports demonstrate that Dominion is routinely operating Millstone in violation of its legal requirements and endangering the public on a daily basis.

Nevertheless, despite these findings, the NRC *praised* Dominion's "good performance" during 2004 and said it warranted *reduced* NRC inspections in 2005 and 2006.

The NRC's conduct is beyond disturbing. Consider this:

On December 31, 2004, the NRC completed a special inspection of Dominion's fire protection system. The NRC inspectors randomly chose six areas to inspect at Unit 2. One was the turbine building. The NRC reported : "No findings of significance were identified."

On January 14, 2005, just two weeks later, a fire broke out in the Unit 2 turbine building. That fire caused an unprecedented all-site evacuation by non-emergency personnel. That fire also disabled Millstone site security: as a result of the January 14 fire, Dominion lost control over its perimeter fence and lost its ability to exclude intruders and keep track of personnel movement within the nuclear plant. The fire – and the NRC inspectors' failure to detect the fire hazard which led to the fire – exposed the people of Connecticut to the worst known security breach in the history of the state.

UNITED STATES OF AMERICA
NUCLEAR REGUATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	:	Docket Nos. 50-336-LR 50-423-LR
Dominion Nuclear Connecticut, Inc.:	:	ASLBO No. 824-01-LR
(Millstone Nuclear Power Station, Units 2 and 3)	:	April 12, 2005

CERTIFICATE OF SERVICE

I hereby certify that copies of Connecticut Coalition Against Millstone's "Notice of Impending Motion to Reopen" dated April 12, 2005 were served on the persons listed below by deposit in the U.S. Mail, first class, postage prepaid, and where indicated by an asterisk by electronic mail, this 12th day of April, 2005.

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