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CONNECTICUT COALITION AGAINST MILLSTONE
www.mothballmillstone.org (<http://www.mothballmillstone.org>)

April 14, 2005

Donald W. Downes
Chairman
Department of Public Utility Control
10 Franklin Square
New Britain CT 06051

Re: Millstone Nuclear Power Station
Application for Renewed Operating License

Dear Mr. Downes:

Your letter to Nils J. Diaz, Chairman of the U.S. Nuclear Regulatory Commission ("NRC"), has come to our attention. (The letter is not dated. However, a copy made available on the NRC website has hand-written notations as follows: "Letter postmarked 3/7/05" and "RDB received 3/28/05.")

Your letter is seriously uninformed and does a disservice to the people of the State of Connecticut.

The letter states in part:

"The Department [of Public Utility Control][“DPUC”] believes that Dominion [Nuclear Connecticut, Inc.] is one of the best nuclear plant operators in the country and that it has demonstrated an excellent history of nuclear plant operation and safety.”

We herewith submit a compilation of “Degraded Conditions” which we have culled from inspection reports filed by NRC inspectors concerning performance of the Millstone Nuclear Power Station in 2004. The year 2004 was characterized by Dominion’s repeated violations of Technical Specifications – Millstone’s federal licensing requirements – and pervasive cost-costing which exposed the public to heightened risks, malfunctioning equipment and shortcomings on the part of operators such that NRC inspectors questioned their basic familiarity with nuclear reactor system functions. We trust that you will share our grave concern about Millstone’s degrading conditions when you become aware of the facts at issue.

We also submit for your information written comments the Coalition presented to the NRC on March 2, 2005 with regard to its draft Environmental Impact Statement on relicensing. That letter addresses extremely high levels of strontium-90 - a potent carcinogen which accumulates in human bones and interferes with biological immune systems - found in goat milk sampled in the years 2001-2003 five miles northeast of Millstone, according to Dominion’s filings with the NRC. The data strongly suggest that Millstone releases excessive levels of strontium-90 to the atmosphere, subjecting the surrounding community – including children who are most vulnerable - to health hazards.

We are not aware that the Connecticut Department of Public Utility has met in open session to address Dominion's accomplishments as a nuclear plant operator nor to consider its "history of nuclear plant operation and safety."

If we are mistaken, please advise when such session occurred and please provide a copy of the minutes of such session.

Regardless of whether such a session occurred, please provide all the data, correspondence and documents upon which the DPUC relied to reach the conclusions quoted above. This request is submitted pursuant to the provisions of the Connecticut Freedom of Information Act.

We also take issue with your statements regarding the report entitled "Connecticut Energy Plan Framework, 2005" (Independent System Operator-New England)("ISO-NE"). That report identifies serious bulk power systems in southwestern Connecticut – an area not served by Millstone-generated electricity because of the nature of the present-day grid. To the extent that your letter suggests that Millstone-generated electricity is a source of energy for southwestern Connecticut, it is misleading.

We further take issue with your comments concerning the ISO-NE report statement that "New England could face a capacity shortage if there is high demand for electricity beginning in 2006 and continuing into the future." (Emphasis added.)

We do not believe that the DPUC's statutorily defined jurisdiction extends to areas outside Connecticut. Within Connecticut, there is presently excess electrical generating capacity which entirely negates the need for Millstone Unit 2's 870 megawatts and, with modest gestures toward energy conservation, Unit 3's 1150 megawatts as well. We refer you to the Connecticut Siting Council's current forecasts of electrical generation.

Finally, your letter perpetuates a myth that greenhouse gas emissions from nuclear power plants are negligible. If this were truly the case, Dominion would not be zealously litigating against the Town of Waterford in pursuit of tax exemptions for employing controls of greenhouse gas emissions. You do not take into account the enormous amount of greenhouse gases released during the uranium fuel fabrication process and in numerous applications throughout the nuclear cycle, including projected transportation to deliver spent nuclear waste to distant repositories. The low-level ionizing radiation continuously emitted by Millstone to the air and water is an insidious carcinogen your letter overlooks.

Finally, as the National Academy of Science has recently reported, densely stored nuclear waste in spent fuel pools – of which there are three at Millstone – pose a realistic threat of terrorist attack. Elevated spent fuel pools – such as serves Millstone Unit 1 – were identified as being highly vulnerable to terrorist attack. Your letter makes no reference to Millstone's appeal as a terrorist target, although it has been identified as one by the federal Department of Homeland security. We question how in good conscience you and the DPUC can support relicensing of Millstone Unit 2 – which, as you will recall, the DPUC declared no longer "used and useful" in 1998 because of its staggering array of licensing violations - through the year 2035 and Unit 3 through the year 2045.

We encourage you to reconsider your inaccurate comments and address corrections to Chairman Diaz without delay.
We encourage you to visit our website, [_www.mothballmillstone.org_](http://www.mothballmillstone.org)
(<http://www.mothballmillstone.org>) , to obtain further information about current operations at Millstone.

Sincerely,

Nancy Burton

cc: Nils J. Diaz
Encl.

Please respond to:
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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.

Dominion operated Millstone in the year 2004 as though no one was watching and no one cared.

Join the Nuclear Watch! Join the Connecticut Coalition Against Millstone. [click to info@mothballmillstone.org]

Make your government keep watch over Millstone!
Contact your public officials:

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CONNECTICUT COALITION AGAINST MILLSTONE
www.mothballmillstone.org

March 2, 2005

Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

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**

Nancy Burton

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