



COALITION OF NEIGHBORHOODS FOR THE PRESERVATION OF SAG HARBOR
CITIZENS ADVISORY COMMITTEE TO THE TOWNS OF SOUTHAMPTON AND EAST HAMPTON

• PO Box 2143 • Sag Harbor • New York • 11963 •

Office of the Secretary
Rulemaking and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

December 10, 1999

RE: Atomic Safety and Licensing/Docket #50-423-LLA-3

CONPOSH is an organization of more than twenty neighborhood groups representing Sag Harbor and CONPOSH is a member of the Long Island Coalition Against Millstone [CAM].

As Millstone Issue Manager of CONPOSH I represent that CAM does have standing in this proceeding and does meet the administrative standards.

Jacqueline Williamson of Fishers Island, a CAM member, is within the 10 mile emergency Planning Zone and the administratively recognized zone of danger. And Long Island residents within Suffolk County, our members, are within the 50 mile ingestion Exposure Pathway. An accident at the Millstone Unit #3 spent fuel pool would impact Drinking water, food and economics, traceable to an accident at the spent fuel pool.

Moreover the challenge to Long Island standing fails to take into considerations factors related to demography, topography, land characteristics and access routes. The conclusions reached by independent analysis and the NRC was that "not only do people evacuate from an unprecedentedly large area when threatened by a radiological emergency, but also they flee longer distances than in other types of disasters." In developing the present emergency planning regulations, the NRC acknowledged that the accident at Three Mile Island "showed clearly that onsite conditions and actions, even if they do not cause significant offsite radiological consequences, will affect the way the various State and local entities react to protect the public from any dangers associated with the accident.

Therefore, standing for Long Island residents, as represented by Jacqueline Williamson As well as for CONPOSH and all the organizations that are part of the Coalition Against Millstone would be proper.

Thank you for your consideration.

Valerie Justin
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