



SOUTH FORK GROUNDWATER TASK FORCE

Office of the Secretary
Rulemaking and Adjudication's Staff
U.S. Nuclear Regulatory Commission
Washington DC 20555

Re: Atomic Safety and Licensing Board
Docket #50-423-LA.3

Dear Sirs:

I am writing on behalf of the South Fork Groundwater Task Force located on the East End of Long Island which is a member organization in the Coalition Against Millstone (CAM).

On behalf of SFGTF, I represent that CAM does have standing in the above mentioned proceedings and meets the administrative standards. In order to have standing a petitioner must show : 1-it has suffered or will suffer a distinct and palpable injury that constitutes an injury-in-fact, with the zone of interests arguably protected by the governing statutes, 2-the injury is fairly traceable to the challenged action; and 3- the injury is likely to be redressed by a favorable decision—i.e. Yankee Atomic Electric Co., CL1-96-1, 43 NRC 1, 6 (1996).

Jacqueline Williamson is within the 10 mile emergency planning zone and the administratively recognized zone of danger. Long Island residents within Suffolk County, including the members of our organization, 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 and would be traceable to an accident at the spent fuel pool.

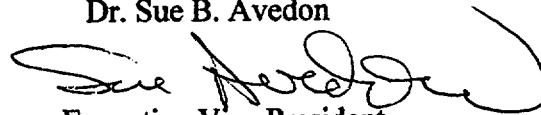
Moreover, the challenge to Long Island standing fails to take into consideration factors related to demography, topography, land characteristics and access routes. The conclusions reached by independent analysis and the NRC was that “not only do people

evacuate from an unprecedentedly large area when threatened by a radiological emergency but they also 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 Jaqueline Williamson, as well as our organization, would be proper.

Dr. Sue B. Avedon

A handwritten signature in black ink, appearing to read "Sue Avedon", with a large, sweeping flourish extending to the right.

Executive Vice President
South Fork Groundwater Task Force

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

NORTHEAST NUCLEAR ENERGY COMPANY

(Millstone Nuclear Power Station,
Unit No. 3)

Docket No.(s) 50-423-LA-3

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing LIMITED APPEARANCE STATEMENTS have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

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LIMITED APPEARANCE STATEMENTS

Dated at Rockville, Md. this
21 day of December 1999


Office of the Secretary of the Commission