

Comment: The Coalition believes that "radiological impacts of normal operations" must be considered on a site-specific basis with regard to Millstone Units 2 and 3 as a Category 2 issue. (MPS-82-56)

Comment: The SEIS does not consider the enormous health care costs associated with the community's long-term exposure to low-level ionizing radiation, nor worker illnesses related to their exposures. We are aware of a recent surgery, upon a patient whose cancer is fairly linked to Millstone radiological and toxic chemical emissions, which cost in excess of \$2.5 million. This does not include follow-up or lifelong care. (MPS-82-63)

Comment: ... the Coalition and others have presented overwhelming and un rebutted evidence of a causal relationship between increased cancer incidence and Millstone operations. (MPS-82-65)

Comment: All radionuclides released by Millstone cause cancer.

According to the U.S. Environmental Protection Agency,

Radioactive materials that decay spontaneously produce ionizing radiation. Any living tissue in the human body can be damaged by ionizing radiation. Cancer is considered by most people the primary health effect from radiation exposure. Simply put, cancer is the uncontrolled growth of cells. Ordinarily, natural processes control the rate at which cells grow and replace themselves. They also control the body's processes for repairing and replacing damages tissue. Damage occurring at the cellular or molecular level can disrupt the control processes, permitting the uncontrolled growth of cells – cancer. This is why ionizing radiation's ability to break chemical bonds in atoms and molecules makes it such a potent carcinogen There is no firm basis for setting a "safe" level of exposure above background for stochastic effects [those resulting from long-term, low-level exposure to radiation] Other than cancer, the most prominent long-term health effects [from radiation exposure] are teratogenic [those that result from the exposure of fetuses or unborn children to radiation] and genetic [those that can be passed from parent to child] mutations.

According to the U.S. Nuclear Regulatory Commission, genetic effects and the development of cancer are the primary health concerns attributed to radiation exposure. (MPS-82-66)

Comment: Millstone discharges these radionuclides and chemicals – and more – into the air and into the nuclear/chemical "mixing zone" known as Niantic Bay, Pleasure Beach and Jordan Cove, defined as an area within 8,000 feet of the Millstone discharge point.

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Some of the radionuclides, such as cesium-137, have been found in fish swimming in Niantic Bay.

Some of the radionuclides, such as cobalt-60, have been found in the sediment of Jordan Cove where they enter the food chain when they are ingested by worms.

Some of the radionuclides and toxic chemicals very likely entered Zachary M. Hartley's mother while she was swimming in the nuclear/chemical "mixing zone" popularly known as Hole-in-the-Wall Beach during critical months of her pregnancy with Zachary, according to an expert on the health effects of low-level ionizing radiation, Dr. Helen Caldicott. Four pathways are possible: breathing, swallowing, skin contact and eating a radioactive fish. Zachary was born with a rare cancer in his jawbone requiring lifesaving surgery. (MPS-82-69)

Comment: Millstone's cumulative dose to the environment and humans, based on annual Millstone reports filed with the NRC since 1970, totals over 6.5 curies. As reported in the response to section 2.2.7, releases of tritium into Long Island Sound since Millstone's restart in 1998 are at all time highs in its operating history.

Current annual plant reports indicate that Millstone Units 2 and 3, as in the years since 1970, have been releasing radionuclides such as strontium-90, cesium-137, iodine-131, -133 and -135, cobalt -58 and -60, krypton-85, xenon-131, -133 and -135, and other such radioactive chemicals, all known to be carcinogenic.

The NRC's denial of a causal relationship between Millstone's 35 years of radioactive releases and elevated cancer rates in nearby towns, and in New London County as a whole, does not hold up to scrutiny.

The most glaring example of the NRC's denial in the Millstone SEIS is its complete omission of consideration of the August 17, 2004 declaration of Dr. Ernest J. Sternglass. The Millstone SEIS lists, on page C-9, Dr. Sternglass' declaration as received on August 17, 2004. This is the only mention of it in the SEIS. (MPS-82-70)

Comment: Dr. Sternglass also states in his declaration, "It is my professional opinion that the radioactive releases from the Millstone Nuclear Power Station since its startup have caused and will continue to cause [emphasis added] excess infant mortality, low birthweight, leukemia and cancer as well as increased rates of both chronic and infectious diseases in the towns around Millstone as well as in New London County and Connecticut as a whole." (MPS-82-71)

Comment: ... in dealing with the Connecticut Tumor Registry's report, "Cancer Incidence in Connecticut Counties 1995-99," the NRC does report that New London County "had the highest

incidence rate of all invasive tumors for females," but omits that this rate was second highest for males, as was reported at the May 2004 public meeting.

Furthermore, the NRC characterizes information in the report indicating that New London County had the highest rate for 12 specific kinds of cancers as "several forms," a choice of words that seeks to minimize a major health crisis.

The NRC also fails to mention information from the report, which was testified to at the May 2004 public meeting, that New London County had the second highest rate for six more kinds of cancer, third highest for five additional ones, and fourth highest for seven more, totally 30 out of 39 kinds of cancers in which New London County was counted separately. (MPS-82-72)

Comment: Similarly, in dealing with a 2003 study by Joseph Mangano et al, presented at the May 2004 public meeting, "Elevated Childhood Cancer Incidence Proximate to U.S. Nuclear Power Plants," the SEIS selectively focuses on information from the study that indicates there may not be a causal relationship between Millstone's radioactive releases and health problems. So the NRC states the study "reported no significant difference in childhood cancer mortality rates between counties surrounding the nuclear plants and the U.S. population."

This would be fine and fair if the agency did not also exclude the major finding of the study, which is that "cancer incidence for children less than 10 years of age, who live within 30 miles of each of 14 plants [one of which is Millstone] in the eastern U.S. (49 counties with a population of more than 16 million) exceeds the national average. The excess 12.4% suggests that 1 in 9 cancers among children who reside near nuclear reactors is linked to radioactive emissions." (MPS-82-73)

Comment: The NRC also failed to mention numerous other studies listed in the bibliography of study that have linked radioactive releases from nuclear facilities to elevated cancers. (MPS-82-74)

Comment: Another example of this exclusion of new and significant information is the NRC's treatment of the 1990 National Cancer Institute study of cancer in counties near nuclear power plants.

That study found that the risk for leukemia in children under 10 in New London County was over 3 times higher than for same aged children in "control counties" used for comparison. (MPS-82-75)

Comment: ... the NRC excluded other NCI information cited by Joseph Mangano in his report, also presented and testified to at the May 2004 public meeting, entitled "2500 Excess Cancer

Cases in New London County Since 1970; Radioactive Emissions From Millstone May Be Cause." In that report Mangano stated, "in Millstone's first 14 years, leukemia cases for New London County children under 10 were **55% higher** than the state, and leukemia deaths **45% higher**. All scientists agree that children are most sensitive to low-level radiation's effects." (MPS-82-76)

Comment: [In reference to the Connecticut Tumor Registry report on Connecticut towns 1995-99] As the NRC well knows, there is no barrier to prevent Millstone radioactive emissions from traveling beyond the boundaries of the town of Waterford. A more comprehensive such analysis would have included other towns [besides Waterford] near Millstone. But the NRC didn't do that, once again excluding critical information.

However, investigative journalist and author Michael Steinberg of Niantic, CT, did perform such an analysis, including the towns of Waterford, East Lyme, Old Lyme, New London and Groton together. Steinberg's analysis, included herein, found higher than expected incidence of cancer in these towns together for: all female cancers, lung cancer for females, colorectal cancers for females, prostate cancer for males, breast cancer for females, melanoma for both males and females, and cervical cancer for females.

These findings are consistent with findings presented from the Connecticut Tumor Registry's study of Connecticut Counties 1995-99, as well as information presented in Mangano's 1998 study "2500 Excess Cancer Cases...", Sternglass' declaration, and a new study by Mangano presented at the January 11, 2005 meeting. (MPS-82-77)

Comment: Finally, the NRC reports in section 4.7 that a 2000 study by the Connecticut Academy of Science and Engineering (CASE) found that "The town of Waterford was not in the highest ratio category for any cancer except thyroid cancer, and at least three other town had higher ratios for thyroid cancer. At least 30 town had higher ratios for pediatric leukemia (ages 0 to 14) than Waterford."

First of all, this analysis, as reported above, is defective by limiting it to Waterford. Secondly, the CASE study focused on the Connecticut Yankee Nuclear Plant, and Millstone is never mentioned in it. Therefore radioactive emissions from Millstone are not considered in its analysis. Furthermore, information for cancer is not reported statistically by town, other than in maps where towns are not identified specifically but are marked by varying shades of white to black.

Nevertheless, the maps do indicate elevated cancers in towns around Millstone for all the specific kinds of cancers studied: thyroid cancer is elevated not only in Waterford, but also in Groton, Old Lyme and Stonington. Multiple myeloma is elevated for Waterford. And acute adult leukemia is elevated for Groton and Ledyard, both downwind of Millstone. However, while

the CASE study uses information from the Connecticut Tumor Registry for 1976-95, I does not look for trends over those years (e.g. by comparing cancer rate increases or decreases over 5 year periods, as was done in studies by Sternglass and Mangano):

The CASE study was initiated in 1997. At that time, all three Millstone reactors had been shut down for two years because of gross mismanagement and harassment of whistleblowers. (MPS-82-78)

Comment: All the above points to the failure of the NRC to conduct a fair and unbiased analysis of the critical information given as public testimony at the May 2004 public meeting in Waterford, Connecticut, and in documents presented there and thereafter to the NRC.

As a result the NRC's conclusion that there is not new and significant information is fatally flawed. The agency excluded and downplayed the critical information that was presented, information that establishes a strong and clear relationship between Millstone's 35 years of radioactive emissions and the concurrent rise of cancers and other diseases in towns around Millstone and in New London County, as well as across Connecticut and into Rhode Island. (MPS-82-79)

Comment: While the Connecticut Tumor Registry is a source of much information about the heightened incidence of cancer and related diseases in the area surrounding Millstone, it is not a completely reliable source of information.

Zachary M. Hartley is not the only victim of Millstone's radiological and toxic chemical releases. In any individual cancer case, a 100 per cent positive correlation with a suspected causative agent cannot be made. That is why we rely on all available information obtained formally – such as the Connecticut Tumor Registry and epidemiological research – as well as informally, through reports of victims themselves or their family members to understand the scope of this public health emergency.

Although Zachary was born in Connecticut with a life-threatening cancer in his jaw and although a tumor the size of an orange was removed from his face when he was 14 months of age, the Connecticut Tumor Registry does not list Zachary's cancer. The Registry's explanation is that a portion of Zachary's tumor was benign and therefore it does not qualify for listing in the Connecticut Tumor Registry. (MPS-82-80)

Comment: The NRC SEIS staff relies on a report of the National Cancer Institute (NCI 1990), which in turn relies on data of the Connecticut Tumor Registry. According to the Connecticut Tumor Registry website, it obtains its funding from the National Cancer Institute. The NCI report is fifteen (15) years old. The NCI report was released four (4) years after Millstone Unit 3

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commenced generating nuclear energy and long before many cancers associated with its dangerous emissions might be detected. It does not reflect the extremely high concentrations of strontium-90, a carcinogen, found in goat milk sampled within five miles of Millstone in 2001. It does not report the case of Zachary M. Hartley. It does not report the case of Rachel Heaton, who developed a rare form of thyroid cancer years after swimming in the Niantic shoreline "mixing zone" because she moved from the area. Nor does it report the brain tumor of Charles D. Douton, Jr., one of three former Millstone site maintenance workers who developed brain tumors and were dismissed from their jobs at Millstone by Northeast Utilities, as identified by Cynthia M. Besade in her August 5, 2004 affidavit. The NCI report does not include any of the seven (7) cancer cases recently identified to the NRC SEIS staff among residents or former residents of a single road - Seabreeze Drive - in Waterford two miles downwind from Millstone. The Connecticut Coalition Against Millstone is actively investigating to determine to what extent the Connecticut Tumor Registry fails to maintain records of other Millstone victims. (MPS-82-81)

Comment: The Coalition attaches a selected Bibliography compiled by the Nuclear Information Resource Service ("NIRS") linking nuclear power plant radiological emissions with cancers in their communities. For example, NIRS reports a 400 per cent increase in leukemia incidence in the population living downwind from the Pilgrim (MA) Nuclear Power Plant during the first five years after nuclear fuel was known to have leaked excess radioactivity. A necessary review of Millstone records will reveal the occurrence of leaking fuel at Unit 2 after Dominion assumed ownership. (MPS-82-82)

Comment: The Coalition believes that Millstone discharges as described above are causing grave and irreparable harm to the marine environment and to human health and that such conduct imperils the health and safety of its membership. (MPS-83-3)

Comment: The Millstone discharges as described above are believed to be directly associated with the rare jawbone cancer found in Zachary M. Hartley at his birth on December 16, 1997. The Millstone discharges as described above are believed to be directly associated with a high and increasing incidence of cancer and related diseases among the human population that resides near the Millstone Nuclear Power Station and utilizes the surrounding beaches at Niantic Bay and Jordan Cove, if not beyond. (MPS-83-5)

Response: *The comments are related to human health issues. The staff reviewed these comments for potential significant and new information relating to an alleged causal relationship between radiation releases from Millstone and excess cancer among the population surrounding the Millstone site. As a result of the staff review, Section 4.7 was revised to address these comments.*

Bioaccumulation

Comment: When they say that it's of moderate significance that the fish population -- and the fish are important because we eat fish. If we don't have anything to eat, we die. There is a food chain, and when the fish die because they are eating worms that are radioactive from Jordan Cove -- and I didn't see the Cobalt-60 mentioned -- of Jordan Cove in this report -- then the fish get sick, and the birds that eat the fish get sick, and the people who eat the fish and other things get sick. We all get sick, and it's unnecessary. (MPS-2-8)

Comment: This reference [GEIS Section 4.6.1.1] is entirely omitted from consideration in the SEIS. The SEIS omits any analysis of the predicted buildup of cesium-137 or cobalt-60 or any other radionuclides in the environment surrounding Millstone. To the extent that cesium-137 released to the environment will have enhanced effects, the NRC's staff's failure to assess the impact to the health and safety of the community -- including Niantic Bay beachgoers who may be pregnant - borders on reckless endangerment.

It is known that cobalt-60 released by Millstone bioaccumulates in the sediment of Jordan Cove and is therefore subject to being ingested by worms and thereby enter the food chain. Yet, the SEIS fails to "re-examine" this phenomenon -- and the potential for bioaccumulation of other radionuclides in the environment surrounding Millstone - consistent with GEIS section 4.6.1.1. (MPS-82-12)

Comment: The SEIS analysis of the collapse of the indigenous fishing stocks does not mention the discovery of a fish caught in Niantic Bay in 1997 contaminated with cesium-137 -- nor Northeast Utilities' acknowledgment that the cesium-137 originated in its nuclear operations.

The SEIS analysis does not mention the build-up of cobalt-60 in Jordan Cove near the Millstone discharge point nor does the SEIS analyze the contribution of cobalt-60 buildup in sediment as a contributing factor in the collapse of the population of the bottom-feeding Niantic winter flounder. (MPS-82-49)

Comment: As stated, the bioaccumulation of cobalt-60 in sediment in Jordan Cove near the Millstone discharge point has been established. The SEIS does not address this phenomenon, even though required by the GEIS.

Millstone's monitoring of the aquatic environment in the area of the discharge has also revealed the presence of the following plant-related radionuclides: cobalt-60, zinc-65, silver-110 and cesium-137.

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In 1997 and at other times, “[I]ndications of plant releases were observed” in aquatic flora, including detectable levels of cobalt-60, zinc-65 and silver-110. According to the 1997 Radiological Environmental report filed by Northeast Utilities,

The detection of these [radio]nuclides throughout the year, as witnessed by positives detected in other aquatic media, correspond to radioactive liquid discharges from the three Millstone units. Sampling of this media provides useful information because it is very sensitive to plant discharges. However, since seaweed is not consumed, other media are utilized in the determination of dose consequences (e.g., see Shellfish and Fish results)

The presence of cesium-137 in a fish caught in the “mixing zone” within the Niantic Bay – as identified as a plant-related contamination in the 1997 Millstone effluent report – suggests widespread bioaccumulation of that carcinogenic radioisotope within the environment, requiring a “re-examination pursuant to GEIS standards.

The “radiological impacts of normal operations” should be analyzed as a site-specific Category 2 issue. (MPS-82-61)

Comment: Correspondingly, the SEIS failed to conduct the analysis required by virtue of GEIS 4.6.1.1, which provides:

To determine whether the added period of operation following license renewal would, by virtue of buildup, result in significant (double) added dose, the ratios of buildup factors for midlives of 30 to midlives of 20 years were evaluated. These ratios amount to a 35 per cent increase for Cesium-137 and a 6 per cent increase for cobalt-60. This added increase due to buildup will not significantly change the total dose to members of the public.

In certain cases, the bioaccumulation factors may require reexamination. These principally involve fish (in the human food chain) that are bottom feeders. Bottom feeders may ingest worms and other biota that may remobilize radioactive materials accumulated in the sediments.

Accumulation of radioactive materials in the environment is of concern not only to license renewal but also to operation under present licenses.

Accordingly, the SEIS is substantially flawed on the issue of cumulative radiological impacts. (MPS-82-84)

Response: *The Millstone Radiological Effluent Release Reports and Annual Environmental Operating Reports for 2001–2003 are considered to be representative of facility operations during the renewal period. Any gradual buildup of radioactive materials in soils, sediment, and subsequent incorporation into plants or bioaccumulation in fish or mammals from past and current operations would have been reported in the Annual Environmental Operating Reports.*

These data show that all plant operational releases of radionuclides are monitored, releases are below the regulatory limits established for safe operations, and accumulation of radionuclides in environmental media or in the food/milk chain have not been significant. In April 2005, the NRC received Dominion's 2004 Annual Radiological Environmental Operating Report for Millstone. The 2004 radiological environmental monitoring data are similar to the data for the time period 2001-2003. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Reference: Dominion Nuclear Connecticut, Inc. (Dominion). 2005. Millstone Power Station, 2004 Annual Radiological Environmental Operating Report. Waterford, Connecticut. April 29, 2005.

Effluent Monitoring

Comment: Despite these comments, it is clear that station monitoring of radioactive effluents is presently inadequate and incomplete and that some radionuclides are released into the environment without measurement or documentation. (MPS-82-36)

Comment: In 1997 alone, there were numerous reported incidences of station radiation monitors being inoperable:

Unit 1 Liquid Radwaste Effluent Monitor (inoperable 6/7/96 – 3/25/97 – 83 days in 1997, 291 days total)

Unit 1 Service Water Effluent Monitor (inoperable 6/9/96 – 7/18/97 – 198 days in 1997, 404 days total)

Unit 2 Steam Generator Blowdown Monitor (inoperable 2/22/96 – 8/26/97 – 237 days in 1997, 551 days total)(NU claims no discharges were made during this period)

Unit 2 Clean Waste Monitor Tank Radiation Monitor (inoperable 5/25/97 – 7/1/97 – 37 days) (NU claims no discharges were made during this period)

Even the GEIS acknowledges that some airborne radioactive effluent releases are not monitored, recorded or documented. (MPS-82-38)

Response: *Effluent releases are reported from samples collected and analyzed in a laboratory. Radiation monitors are used to provide plant operators information during a release. Plant procedures invoke compensatory measures when monitors are inoperable to account for*

all releases. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Strontium-90

Comment: Scientists at radiation.org have published a book "The Enemy Within: The High Cost of Living Near Nuclear Reactors." They proved it statistically. They are also documented in the nationwide tooth fairy project, which is documenting Strontium-90 in your baby teeth. Okay? It acts like calcium, radioactive cancer-causing chemical only from the nuclear reactors now, folks, because the nuclear bomb testing stopped quite a while ago.

The Strontium-90 acts like calcium, goes into your bones and teeth, where it nails your immune system, your thyroid function, so you're vulnerable to cancer, bacteria, and viruses.

Now, just to let you know -- a little alert here -- the first lawsuit has already happened. It's directed against the St. Lucie Nuclear Reactor in Port St. Lucie, Florida, because at least five children, last I heard, were suing because they could prove the Strontium-90 in their baby teeth. They did a big tooth fairy project in Florida. The kids with cancer had twice the Strontium-90 levels in their baby teeth as the kids who didn't have cancer.

And according to radiation public health, 35 baby teeth so far in Connecticut, the kids living closest to the nuclear reactors around Indian Point and Millstone Nuclear Reactor have the highest Strontium-90 levels. Okay? (MPS-1-6)

Comment: In addition to Dr. Sternglass' affidavit, you saw us present documents from Joseph Mangano in which he detailed recent analysis of teeth donated by children. And these teeth, according to the declaration provided by Mr. Mangano, were analyzed for Strontium-90 content. And the information that was submitted showed that the baby teeth collected in the State of Connecticut had, in the areas nearest the nuclear power plant, double the level of Strontium-90 as compared with the average -- so-called -- in the population, measured in picocuries per calcium -- gram calcium. (MPS-2-3)

Comment: It also talks about the tooth fairy project, where this group has been testing Strontium-90 in children's teeth. And what it has found in Connecticut so far is that Connecticut has -- along with Pennsylvania has the highest amount of Strontium-90 on average of the six states that they've tested so far.

And as far as the counties near nuclear plants, which are Fairfield near Indian Point and our county, New London, near Millstone, they have the -- an average concentration, 180 percent more, which is more than double that of the other counties in Connecticut. (MPS-3-5)

Comment: It was documented in St. Louis baby teeth. They documented with 35 baby teeth so far that the highest level of strontium-90, the radioactive plants are causing nuclear emission in our baby teeth. The highest is around towns living closest to Millstone Nuclear Reactor and Indian Point Nuclear Reactor. - (MPS-22-1)

Comment: We know from Millstone's reports that its strontium-90 has found its way less than two miles down wind to goats because it is revealed in their goat milk. Well, if the strontium-90 is found in goat milk, we know it must also be found in the grass, in the water, in the air, and in people. And can anybody not understand here how it ends up in the teeth of children in this community? (MPS-23-5)

Comment: And from there, you will determine to close Millstone. But before you do that, you will determine that there should be immediate action taken; for instance, filters. The strontium-90 that escapes through the vent at Millstone and contaminates this community can be blocked. (MPS-23-7)

Comment: Laboratory analysis of baby teeth donated by children with cancer in the areas near the Millstone and Indian Point Nuclear Power Plants found levels of radioactive strontium-90 more than twice as high as found in teeth collected from other parts of the state, according to Joseph J. Mangano, National Coordinator of the Radiation and Public Health Project.

"The average level of strontium-90 concentration close to the nuclear power plants was 6.16 picocuries per gram of calcium, compared with 2.70 picocuries in other parts of the state," Mangano said.

"For children suffering from cancer, the average level of strontium-90 concentration was 7.03 picocuries per gram calcium," Mangano said.

"The presence of strontium-90 elevated levels near the nuclear power plants cannot be accounted for other than from their routine releases of strontium-90," Mangano said. (MPS-46-1)

Comment: In its most recent report of radiological emissions to the environment, based on samplings taken in the year 2002, Dominion reported the presence of strontium-90 in the milk of goats living two miles downwind of Millstone.

"Despite information to the contrary in its own reports, the owners and operators of Millstone have denied that strontium-90 found in goat milk near and downwind from Millstone has been

coming from their nuclear reactors," said Michael Steinberg, author of "Millstone and Me," a book analyzing Millstone's radiological releases. (MPS-46-3)

Comment: 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 dose 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. (MPS-51-4)

Comment: 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 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. (MPS-51-5)

Comment: At the same time, the NRC staff virtually ignored the information available to it even in the limited area it selected for review: the years 2001-2003.

The most glaring example we may provide you of this appears as the preliminary comment we provided to you on, together with the declaration of Ernest J. Sternglass, Ph.D. Dr. Sternglass evaluated Dominion Nuclear Connecticut, Inc.'s reports of strontium-90 levels sampled in goat milk five miles from Millstone during 2001, 2002 and 2003. Although one sample measurement reported by Northeast Utilities in 2001 was at a level nearly twice the highest level of measured strontium-90 concentration in Connecticut milk during the height of the atmospheric nuclear weapons testing in the 1960s, this fact is not reported in the SEIS nor is it analyzed, nor are the other high strontium-90 measurements in goat milk sampled five miles downwind from Millstone analyzed. (MPS-82-6)

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Comment: In 2001, Dominion reported concentration levels of strontium-90 contamination in goat milk sampled within five (5) miles downwind of the Millstone Nuclear Power Station nearly twice as high as the highest recording measurement of strontium-90 concentrations in Connecticut milk during the height of the 1960s atmospheric nuclear weapons testing. (MPS-82-24)

Comment: While the strontium-90 concentration in milk declined for the United States as a whole between 1970 and 1975, from 8 pCi/l to 3 pCi/l, it rose from 9.8 in 1970 to a high of 15.8 in 1973 and 14.8 in 1974 near Millstone, remaining at 10.7 by 1975. This is far in excess of the U.S. average of 3 pCi/l, ruling out any significant contribution to the local milk from bomb test fallout by France and China that continued until 1980.

The calculated yearly radiation dose to bone of a child due to excess strontium-90 within 10 to 15 miles of Millstone, in excess of the yearly dose for the United States, rose from 33 millirem per year in the first full year of operation to 204 millirem per year by 1974, nearly three times the normal background level of 70 millirems per year in Connecticut.

These doses of strontium-90 alone may be compared with the 15 millirem per year to any organ permitted under current NRC regulations, the 2 millirem produced to bone marrow in a typical X-ray of a child, and the 80 millirem per year to a developing fetus found to produce a doubling of the rate of childhood leukemia in the studies of the renowned Dr. Alice Stewart. (MPS-82-33)

Comment: As Dr. Sternglass has pointed out, in 2001, Dominion recorded concentrations of strontium-90 in goat milk sampled five miles from Millstone at a level nearly twice that of the highest recorded concentration of strontium-90 in milk in Connecticut during the peak of atmospheric atomic bomb testing in the 1960s. (MPS-82-37)

Comment: Moreover, the SEIS does not identify nor quantify strontium-90 releases, nor note the absence of strontium-90 monitoring from the station stack, while strontium-90 concentrations are regularly found to be inordinately high in goat milk taken from samples five miles from Millstone. (MPS-82-41)

Response: *NRC's Office of Public Affairs has published a background paper entitled, "Radiation Protection and the Tooth Fairy Issue," which contains the following information about Strontium-90 (Sr-90). Approximately 16.8 million Curies of Sr-90 were dispersed globally by atmospheric testing of nuclear weapons before 1980, and Sr-90 has a half-life of 28 years. Therefore, millions of Curies of that Sr-90 is still in the environment and account for about 0.3% of the average annual dose of roughly 300 millirem a person in the United States receives from natural background radiation. An additional 216,000 Curies of Sr-90 were released into the atmosphere as a result of the Chernobyl accident. Altogether, the 103 nuclear power plants in the United States release a total of about 1/1000th of a Curie of Sr-90 each year.*

Dominion's annual radiological effluent reports to the NRC indicate that Millstone releases an average of 2 microCuries (2×10^6 Curies) of Sr-90 in liquid and gaseous effluents each year. A total of 1 microCurie of Sr-90 was released in gaseous effluents in 2002, and no detectable amount of Sr-90 was released in gaseous effluents in 2001, 2003, and 2004. Millstone also releases a small amount of Sr-89, which has a half-life of about 50 days. Because of the short-life, any Sr-89 in the environment around Millstone could not be from Chernobyl or atmospheric testing and would likely be from Millstone effluents. If Sr-90 is found in the environment without Sr-89 near an operating nuclear power plant, then it is highly likely that the Sr-90 is from Chernobyl or atmospheric testing. No Sr-89 was detected in the gaseous effluents for 2001, 2002, and 2003. In 2001, 2002, 2003, and 2004, 20 microCuries, 200 microCuries, 220 microCuries, and 90 microCuries of Sr-89 were released in liquid effluents, respectively.

As part of its radiological environmental monitoring program, Dominion obtains milk samples from goats at farms near Millstone and performs radio-chemical analysis to determine the concentrations of Sr-89 and Sr-90 in that milk. Dominion's annual radiological environmental monitoring reports to the NRC typically indicate concentrations ranging from below the lower limit of detectability to 15 picoCuries (15×10^{12} Curies) of Sr-90 per liter of milk, and the concentrations of Sr-89 are below the lower limit of detectability. Dominion has concluded that the Sr-90 is from atmospheric testing of nuclear weapons or the Chernobyl accident because the plant would have to release Curies of Sr-90 (not microCuries) to result in the concentrations measured in the milk.

Sometimes higher concentrations of Sr-90 are found; Dominion reported a concentration of 55.5 picoCuries (55.5×10^{12} Curies) of Sr-90 per liter in goat milk that was composited from July, August, and September of 2001 at a farm approximately 5 miles from the plant. Dominion believes that the goats sometimes begin to nibble the roots of the pasture grass. Along with the grass roots, the goats may also ingest some soil that contains Sr-90 left in the environment from atmospheric nuclear testing. Analyses of the same goat milk indicated that the concentration of Sr-89 was below the lower limit of detectability, another indication that the Sr-90 is not from Millstone.

The Connecticut Department of Environmental Protection (CTDEP) also analyzes goat milk from the same locations as Dominion and has obtained similar analysis results. CTDEP has not identified any evidence of the Sr-90 in the goat's milk as being from Millstone. The NRC inspected the monitoring programs at Millstone and reviewed Dominion's annual reports and came to the same conclusion.

Based on the sources of Sr-90, measurements in the environment, and health effects studies (see Section 4.7 of the SEIS), the staff concludes that the comments provided no new and

significant information on Sr-90 releases from Millstone and their impact on human health; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Chemical and Radiological Synergistic Effects

Comment: I have heard a lot of testimony tonight about risk factors for the people living in this community. We seem to be having cancers. And it's very hard to pinpoint exactly what the causes of those cancers are.

The effect of all sorts of toxins in our environment is cumulative. And I want to suggest that, like the flounder, we are a vulnerable population and that any additional risk is unacceptable. (MPS-25-3)

Comment: There is a need for an independent epidemiological study of areas around the plant beyond Waterford and including New London County and parts of Long Island where cancer clusters have been identified. Radioactive and chemical contaminants are routinely released from the plants into air and water. (MPS-28-6)

Comment: At the very least, the NRC should be required to evaluate the environmental impact of Millstone's radiological and chemical effluents – singly, in synergy and cumulatively - under site-specific analysis to qualify under the standards of the National Environmental Policy Act. (MPS-82-35)

Comment: Many chemicals discharged by Millstone are known carcinogens, such as hydrazine, hexavalent chromium, cadmium, lead and benzene and many others. Millstone routinely discharges into the nuclear/chemical "mixing zone" which extends 8,000 feet toward the Niantic and Waterford shorelines, the following chemicals and others: Chemicals & Metals "Known or Suspected Present" in Discharge [156 compounds listed] (MPS-82-67)

Comment: The interaction of radionuclides and chemicals has been established to create a synergy, multiplying the harmful effects of each. (MPS-82-68)

Response: *These comments relate to the possible synergistic effect of chemicals and radiation. A synergistic effect is a biologic response to multiple substances where one substance worsens the effect of another substance. Thus, the combined effects of substances acting together may be greater than the sum of the effects of substances acting by themselves. However, in the case of Millstone, the chemical releases and radiation exposure are within the standards set forth by the NRC and EPA. The standards for chemical and radiation exposure are set conservatively, in part to address the potential for synergistic effects. The comments*

provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Electromagnetic Fields

Comment: In addition to my concerns, it appears the NRC down plays the impact of EMF on the people and the environment. (MPS-30-3)

Response: *The comment relates to the impacts of the electromagnetic fields associated with the transmission lines. These impacts are discussed in Section 4.2 of the SEIS. The comment is general in nature and provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.*

Occupational Exposure

Comment: You mentioned the Columbia Healthy Worker Effect Report. It sounded a little confusing to me, because originally the Healthy Worker Effect was discovered or outlined by Dr. Mancuso with the help of Dr. Stewart, Alice Stewart, from Great Britain.

And the point of that Healthy Worker Effect was that the people hired to work on a regular basis at nuclear plants at the particular site that they were referring to are people at the prime of their life in a healthy condition.

Therefore, the effects of radiation are not as powerful on them as it is on infants and old people and children in utero, so that they pointed out that was not a good basis on which to establish safety standards which are the standards which are now being based -- they are based on.

And, therefore, those standards are wrong,... (MPS-5-2)

Comment: They accepted that working there posed some risk, and that they would be exposed to some types of radiation. But never were they told that they were not protected fully. (MPS-6-5)

Comment: In 1993 -- excuse me, 1994, that department was deleted. Those people were met at the door and told that they had lost their jobs.

Why? Well, they talked about it being downsized. Well, in reality, three people in that department with brain cancer probably scared them to death, especially when two of them died. The third remains alive but does not enjoy the quality of life that any of us do. (MPS-6-6)

Comment: In 1996, after workers in the site maintenance department at Millstone were diagnosed with brain cancers and Northeast Utilities dismissed the entire department – after securing releases the workers would not sue Northeast Utilities if the company paid them double severance pay – and hired transient contract workers to perform hot and dirty tasks within the plant, two of the workers died untimely deaths due to their brain cancers. (MPS-82-19A)

Comment: On August 16, 2003, Joseph H. Besade became the seventh known pipefitter to die prematurely from workplace exposures at Millstone. (MPS-82-26)

Response: *The comments relate to occupational exposure. Section 4.7 discusses concerns about radiation exposure and cancer in general; that discussion is also applicable in response to these comments that relate specifically to the potential causal link between occupational radiation exposure and cancer.*

Although radiation may cause cancers at high doses and high dose rates, currently there are no data that unequivocally establish the occurrence of cancer following exposure to low doses and dose rates, below about 0.1 sievert (Sv) (10 roentgen equivalents man [rem]). However, radiation protection experts conservatively assume that any amount of radiation may pose some risk of causing cancer or a severe hereditary effect and that the risk is increased for higher radiation exposures. Therefore, a linear, no-threshold dose-response relationship is used to describe the relationship between radiation dose and detriments such as cancer induction. Simply stated, any increase in dose, no matter how small, results in an incremental increase in health risk. This theory is accepted by the NRC as a conservative model for estimating health risks from radiation exposure, recognizing that the model probably overestimates those risks. Based on this theory, the NRC established a conservative limit of 0.05 Sv per year (Sv/yr) (5 rem per year [rem/yr]) in 10 CFR Part 20 for radiation doses to people exposed to radiation as part of their job, such as operating personnel at nuclear power plants.

Many studies have been performed on the health effects of radiation exposure, and none of the scientifically valid studies show any health effects at acute doses less than 0.1 Sv (10 rem), which is double the occupational dose limit of 0.05 Sv/yr (5 rem/yr). In addition, the average dose to a nuclear power plant worker is less than 0.01 Sv/yr (1 rem/yr); therefore, the NRC concludes that the health risk from occupational radiation exposure to nuclear power plant workers is very small.

Research on the effects of radiation on the health of workers is ongoing. A new study of U.S. nuclear power industry workers entitled, "Analysis of the Mortality Experience Amongst U.S. Nuclear Power Industry Workers After Chronic Low-Dose Exposure to Ionizing Radiation," was recently published by Howe et al. in Radiation Research (Volume 162, pages 517–526, 2004),

the official journal of the American Radiation Research Society. The study, by Columbia University's Mailman School of Public Health, tracked more than 53,000 workers from 15 nuclear utilities in the U.S. for periods of up to 18 years between 1979 and 1997. No statistically significant associations with radiation were found for mortality from leukemia and other cancers. Additional information about the findings of this study is available at: <http://www.bioone.org/bioone/?request=get-abstract&issn=0033-7587&volume=162&page=517>.

The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Comment: ... the SEIS fails to identify or evaluate any "additional maintenance, testing and inspections as a result of a variety of age-related changes in operational procedures" at Millstone.

With regard to the above statement:

Added maintenance, testing, and inspection will be accompanied by increased exposure time to members of the work force but are not expected to significantly influence dose to members of the public

the SEIS fails to identify or evaluate any "added maintenance, testing, and inspection" at Millstone and hence fails to evaluate increased exposure time to members of the work force and members of the public during the proposed renewal period. (MPS-82-58)

Response: *The comment relates to possible dose increases. Sections 2.2.7 and 4.3 discuss the expected impacts of radiation exposure to workers and the public during the license renewal period. Programs designed to manage aging of structures, systems, and components during the license renewal period may add maintenance, testing, and inspection requirements at Millstone; however, these added requirements are not expected to significantly increase doses to workers or to the public. The comment provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.*

Comment: The SEIS also fails to consider the environmental impact of Dominion's August 24, 2004 submittal to the NRC requesting approval of the "Nuclear Facility Quality Assurance Program Description." According to an Request for Additional Information ("RAI"), dated February 24, 2005, this program deletes from the Millstone Quality Assurance program radiological protection responsibilities which include "maintaining records and reports on radioactive contamination levels." If this application is approved, a safeguard to protect against excessive worker radiological contamination will be lost and there will be no basis for the NRC

to conclude now that occupational radiation exposures during the license renewal term will be small and within regulatory limits. (MPS-82-59)

Response: *The comment relates to radiological protection recordkeeping. Dominion's license amendment request dated August 24, 2004, addressed by the comment, is under review by NRC radiation protection experts. The license amendment, if granted, will not change the requirements for monitoring, recording, and reporting doses to workers under 10 CFR Part 20. The comment provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.*

Regulatory Standards

Comment: In addition, you saw that we presented a report, a recent report from the European Commission on Radiation Standards, which in very conscientious terms analyzed the present levels/standards of radiation exposure that are being applied in these present proceedings and found, on the basis of overwhelming scientific evidence, that the standards are probably 100 to 1,000, or possibly more, understated, and that the standards should be very, very significantly heightened in order to protect the population from disease from cancer and even genetic mutation. (MPS-2-4)

Comment: ... there has been very much research done at the cellular level, which has shown -- and this is pointed out in the BEIR V, which is the National Academy of Sciences -- the Biological Effect of Ionizing Radiation -- in BEIR V, they make the statement that any -- any amount of radiation can cause harm.

So a single ionizing event of radiation can cause harm, and that's what is being looked at at [sic] the cellular level. And at this point it's being shown that the ICRP and those bodies that are setting the standards are 100 or even 1,000 times off the base.

And where we couldn't account for many of the leukemia and cancer clusters in various parts of the world, it's shown that if you discount ICRP and start to look at some of the cellular research, such as the bystander effect, which is where an ionizing track passes by a cell, a nearby cell, it doesn't have to touch the cell, but the energy given off will affect the cell.

And then we have the second event theory put out by Chris Busby in England, whereby DNA -- the DNA is hit by an ionizing particle and a second event occurs within a short period of time before the cell can -- the DNA cell can repair the damage, and then it mutates.

These have been shown -- this research has been shown to account now for these cancer clusters that we see around nuclear facilities. And I would urge people to go beyond the ICRP and UNSCEAR and look at some of the more recent research.

In the UK now, they have the -- in Europe, I should say, they have the European Committee on Radiation Risk, which looked at the ICRP model and found it's badly flawed, and we should be looking in other directions at that, which they are doing. (MPS-4-3)

Comment: You referred to the ICRP and other agencies, which primarily refer to externally received rems/doses of radiation. What I want to know is: have you looked and are you considering the latest information, the latest scientific information, both from Great Britain and from the United States, that refer to internal emitters and the effect of internal emitters? (MPS-5-1)

Comment: The Coalition notes that the European Committee on Radiation Risk ("ECRR") has reported that radiation dose models employed by the NRC and other governmental agencies are probably 100 to 1,000 times too high to be accurate. (MPS-82-83)

Response: *The comments relate to the NRC's radiation protection standards. The NRC's regulatory limits for radiological protection are set to protect the public from the harmful health effects of radiation as discussed in Section 4.7. These radiation standards reflect extensive study by national and international organizations (e.g., International Commission of Radiological Protection, National Council on Radiation Protection and Measurements, and the National Academy of Sciences) and are conservative to ensure that the public is adequately protected.*

The European Commission on Radiation Protection concluded in Radiation Protection Report 125, "Low Dose Ionizing Radiation and Cancer Risk" that the lifetime cancer risk estimate for acute high-dose exposure made by UNSCEAR in its 2000 report agrees well with those made by UNSCEAR and ICRP in previous evaluations. Scientific evidence has not shown any health effects in connection with low doses of radiation at low dose rates (less than 10 rem). This conclusion is also supported by the Health Physics Society in its 2004 position statement, "Radiation Risk in Perspective." The NRC's regulatory limits for members of the public are expressed in mrem/yr (EPA standard is 25 mrem/yr). The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Reference: European Commission on Radiation Protection. 2001. Radiation Protection Report 125, "Low Dose Ionizing Radiation and Cancer Risk." Accessed at: http://europa.eu.int/comm/energy/nuclear/radioprotection/publication/doc/125_en.pdf on June 24, 2005.

Reference: Health Physics Society. 2004. Position Statement of the Health Physics Society, "Radiation Risk in Perspective." August 2004. Accessed at: <http://hps.org/documents/radiationrisk.pdf> on June 24, 2005.

Breast Cancer

Comment: But radiation.org did their research, and they proved statistically -- and published it in a book -- years ago that women who live within 100 miles of a nuclear reactor have the greatest risk of dying of breast cancer.

Now, anyone who doubts this information, you can see it visually. And this is the NRC's own map. So how do they refute their own map? And how do they refute the government that they work for? Here you go, folks. Here is the breast cancer mortality for women, 50 to 74 years old dying of breast cancer. It's not about any one town. (MPS-1-2)

Comment: This is the NRC map. Okay? I'll make it easy for you. There is a correlation. These are government maps that show that 20- to 49-year olds are dying in the northeast, and the 40- to 74-year olds that die in the northeast, and the Tumor Registry confirms it. (MPS-1-4)

Comment: That's why they have a nine-year old child down there in Long Island with breast cancer, and the government did a \$6 million study to find the cause of breast cancer. They couldn't find it because they just happened to leave out the nuclear emissions as part of the study. That was exposed in the New York Times article by Dr. Janet Sherman, who works for Radiation.org. It was published. (MPS-1-5)

Comment: I'm hit by both nuclear reactors. I'm within that 100-mile radius. That radiation.org documented statistically proves the risk for breast cancer mortality is greatest if you're within the 100 miles. (MPS-22-3)

Comment: This is the government maps, no dispute, folks. The government that employs the NRC has funded and done these maps. Okay? This is the breast cancer mortality link to nuclear reactors. (MPS-22-4)

Comment: The areas of high breast cancer mortality line up with the location of nuclear reactors. And that is why the Northeast has the highest breast cancer mortality. (MPS-22-5)

Response: *Section 4.7 discusses concerns about radiation exposure and cancer in general; that discussion is also applicable in response to these comments that relate specifically to the potential link between radiation exposure and breast cancer.*

Nuclear power plants frequently sited within 50 miles of major population centers because that is where the power demand is greatest. According to 1990 census numbers compiled for the 50-mile emergency planning zones (EPZ) (2000 aggregate numbers are not yet available) of nuclear reactors, approximately 130,000,000 people reside within these 50 mile EPZs. With almost half of the United States population living within 50 miles of a nuclear power plant,

statistically, it is expected that the occurrence and mortality of breast cancer, as well as other diseases, would be more readily seen in this large population.

According to the American Cancer Society (ACS), mortality rates across the general population of the United States from breast cancer were steady from 1950 until approximately 1990. From 1989 to 1998, breast cancer mortality declined by as much as 3.4% annually. These decreases, according to tables on the ACS web site, occurred in states with nuclear reactors as well as in states without nuclear reactors.

The ACS, as discussed in its publication "Breast Cancer Facts & Figures 2001-2002," states that the apparent increase in incidence of breast cancer during the 1980s is attributable to "increased detection through greater use of mammography screening, with diagnosis of smaller, more easily treatable cancers than would have occurred otherwise." The ACS further states that "perceptions of increasing breast cancer cases in young women in the late 1980s and early 1990s are largely due to the growth and aging of the US population, as many "baby boomer" women reached ages 25-40 at that time." The ACS further noted that since 1985, breast cancer incidence rates among women under 40 have actually declined significantly at an average 1.3% per year.

In 1990, at the request of Congress, the National Cancer Institute (NCI) conducted a study "Cancer in Populations Living Near Nuclear Facilities," to look at cancer mortality rates around 52 nuclear power plants (including Millstone), nine Department of Energy facilities, and one former commercial fuel reprocessing facility. John Boice, Sc.D., who was chief of NCI's Radiation Epidemiology Branch at the time of the survey, concluded: "From the data at hand, there was no convincing evidence of any increased risk of death from any of the cancers we surveyed due to living near nuclear facilities,...." In addition, based on analyses of data from the Connecticut Tumor Registry, the Connecticut State Department of Public Health concluded that there is no increased cancer incidence in Connecticut due to radiation exposure from Millstone. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Analysis and Process

Comment: 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.) (MPS-51-3)

Comment: Although Millstone's reactors have been operating since 1970, and thus have generated a 35-year history of operations and record of environmental impact, the NRC selected only a *three-year period* (2001, 2002 and 2003) to review to assess Millstone radiological emissions for purposes of its SEIS evaluation. Necessarily, the NRC staff's superficial and selective review deprived it of the opportunity to engage in a meaningful assessment of the environmental impacts of Millstone's complete operating history to inform the evaluation necessary to evaluate the full scope of future effects during a potential period of license extension. (MPS-82-5)

Comment: The Millstone Draft Environmental Impact Statement analysis largely avoids the **primary issue** presented by the prospect of relicensing Millstone Units 2 and 3 for additional 20-year terms: the effects of routine releases of radiological and toxic chemical releases to human health and the environment surrounding the nuclear facility. (MPS-82-16)

Comment: The NRC's Generic Environmental Impact Statement ("GEIS") was published in the year 1996, or nine (9) years prior to the NRC's invitation for public comment on the SEIS, at a time when Unit 2 had operated for 26 years, Unit 1 for 21 and Unit 3 for 10 years. Necessarily, when the GEIS refers to "current levels" of radiation, it is referring to radiation levels which were "current" in 1996 or earlier. The GEIS is not itself current, but is outdated and fails to account for the past nine (9) years of operations within the U.S. nuclear industry.

The GEIS itself is obsolete. Although the NRC staff states in the SEIS it was not required to consider site-specific aspects of Millstone's routine radiological emissions because Millstone site-specific routine radiological emissions were considered in the GEIS at Appendix E, GEIS Appendix E is limited to "routine" radiological emissions during the years 1985-1987. No explanation is given why a report published by the NRC in 1996 relies on 10-year-old data, when its purpose is to project radiation levels five decades into the future. At best, GEIS's radiological analysis of "routine" Millstone radiological emissions is incomplete and superficial. (MPS-82-17)

Comment: Moreover, Millstone is unique in the annals of the U.S. nuclear industry: Millstone has released the highest levels of radionuclides of any nuclear power station in the country at various times over the past 35 years of its operational history.

From 1970 to 1987, Millstone had released a total reported release of 32 curies of radioactive iodine and particulates into the air, which included the highly carcinogenic strontium-90 and iodine-131, together with 6.7 million curies of total fission and activation gases such as xenon and krypton. During the same period, Millstone released 581 curies or 581 trillion picoCuries of radiation in the highest liquid volume of such releases of mixed fission and activation products of any nuclear plant in the United States.

In a single year, 1975, Millstone released a record reported high of 9.99 curies of iodine and particulates into the air and 199 curies of liquid mixed fission and activation products into the Long Island Sound, also a record for all U.S. reactors.25 Id. (MPS-82-32)

Comment: These figures [in the SEIS] do not break down the radioisotopes released, other than for Iodine-131 and Tritium, and do not identify nor quantify which radioactive gases are emitted, such as xenon-137 (with a half-life of 3.9 minutes decaying to cesium-137 with a half-life of 30 years); xenon-135 (with a half-life of 9.17 hours decaying to cesium-135 with a half-life of 3,000,000 years); nor krypton-89 (with a half-life of 3.2 minutes decaying to strontium-89 with a half-life of 52 days). These radioactive materials are long-lived and have cumulative impacts. The SEIS does not analyze these environmental impacts. (MPS-82-39)

Comment: Since the SEIS analysis was self-limited to the years 2001, 2002 and 2003, and annual releases for the 32 other years Millstone has been operating were not considered, the statement that "These releases from both units are typical of annual releases from Millstone" is not substantiated.

Moreover, the SEIS statement, that [these releases] are not expected to increase during the renewal period" is incorrect. First, releases of tritium, a known cancer-causing radioactive toxic with a half-life of 12.3 years, are trending upward. Second, as Units 2 and 3 operate for longer periods at full capacity, airborne radioactive emissions will increase. Similarly, if during the renewal period Millstone Units 2 or 3 receive approval for power upgrades, airborne radioactive emissions will increase. The consequences of these reasonably foreseeable circumstances were not analyzed in the SEIS. (MPS-82-40)

Comment: The NRC GEIS staff review of Millstone data on the most critical issue of "radiological impacts of normal operations" was self-limited to the years 1985, 1986 and 1987. Thus, in its consideration of whether the Millstone Nuclear Power Station should be permitted to operate in the years 2015-2025 (Unit 2) and 2025-2045 (Unit 3), the NRC deliberately failed to consider the "radiological impacts of normal operations" for the years 1970-1984, 1988-2000 and 2004 to the present.

Put another way, the NRC considered Millstone's "radiological impacts of normal operations" for only 6 of the 35 years the Millstone nuclear reactors have been routinely releasing harmful radiation into the environment – just 17 per cent of Millstone's operational history. Twenty-nine (29) years of Millstone's routine releases of harmful radiation releases to the environment are not evaluated in either the GEIS or the SEIS:

By limiting the pool of data considered in the GEIS and the SEIS to a period of time which encompasses only 17 per cent of Millstone's operational history of harmful radiation releases to the environment, the NRC failed to consider all available information. The NRC's evaluation of future impacts based on past impacts rests on an inadequate data base and its conclusions are accordingly unreliable, if not invalid. Certainly, the NRC staff's consideration of "cumulative" impacts (SEIS section 4.8.3) is scientifically unsound if not indeed scientifically fraudulent, since the NRC staff did not review, tabulate or assess the full scope of past impacts to be able to "accumulate" cumulative impacts.. (MPS-82-55)

Comment: Finally, as stated, the SEIS states that the NRC staff is not required to evaluate Millstone radiation releases on a site-specific basis because Millstone releases were subjected to site-specific analysis in the GEIS which found them to be "well within regulatory limits." This statement is most misleading in that it fails to acknowledge that the NRC GEIS staff limited itself to reviewing Millstone's reported radiological emissions for the years 1985, 1986 and 1987 only. Millstone's largest reactor, the 1,220-megaWatt Unit 3 – was still under construction in 1985. By the year 1987, it had not established an operational record; it has since substantially increased output and, hence, "routine" radiological emissions. (MPS-82-57)

Response: *The comments relate to the analysis process used in preparing the SEIS. The NRC concluded that the radiological effluent data for the time period 2001–2003, the most recent data, was the best indicator of the radiological effluents that would be expected during the renewal period. In April 2005, the NRC received Dominion's 2004 Radioactive Effluent Report for Millstone. The 2004 data are similar to the data for the time period 2001-2003. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

Reference: Dominion Nuclear Connecticut, Inc (Dominion). 2005. Millstone Power Station, 2004 Radioactive Effluent Release Report. Volume 1. Waterford, Connecticut. April 30, 2005.

Tritium

Comment: in the draft EIS on page 243 it says, in relation to radioactive-type stuff, "The applicant does not anticipate any significant changes to the radioactive effluent releases of exposures from Millstone operations during the renewal period. And, therefore, the impacts to the environment are not expected to change."

Now, unfortunately, from -- this is from Dominion's annual radiological environmental operating report from 2003, where it's talking about Tritium, which is radioactive hydrogen. It says, "Since the restart of Unit 3 in 1998, and Unit 2 in 1999, Tritium releases in liquid effluents have risen to levels at or above those observed in the pre-shutdown period."

Now, the Tritium releases into Long Island Sound are at record highs for Millstone. And so that doesn't agree with the conclusion of the NRC, which says they're going to stay the same. (MPS-3-11)

Comment: The water does go back into Long Island Sound. And it's full of tritium. And the more that the plant runs at full power, the more tritium gets put back into Long Island Sound. That's not new, but it's a fact; and it's an environmental fact. (MPS-18-9)

Comment: According to the Coalition, Millstone radiological releases of tritium - radioactive hydrogen - to the environment are increasing to all-time highs. (MPS-46-5)

Comment: ... in Dominion Nuclear Connecticut Millstone Station Annual Radiological Operating Report 2003, in section 4.14, Seawater, on page 4-9, it is stated, "since the restart of Unit 3 in 1998 and Unit 2 in 1999, tritium releases in liquid effluents have risen to levels at or above [emphasis added] those observed during pre-shutdown period."

Dominion records indicate that Millstone released 1854 curies of liquid radiation in 2000, an all-time high. Such reported releases totaled 1273 curies in 2001; 1537 in 2002 and 1278 in 2003. NRC records for Millstone's liquid tritium releases totaled from 1970-1994 totaled 11,550 curies. The total from 1995-2003 was 8551 curies. (MPS-82-42)

Comment: It is undeniable that the more the pressurized water reactors of Units 2 and 3 operate, the more tritium by-products they will create and release into the environment.

The current stated policy of both Dominion and the nuclear power industry in general is to operate power reactors as close to maximum capacity as possible. In 2003 Millstone 3 operated at almost 100% capacity. Millstone 2 operated at 80% capacity, but only because it shut down for refueling.

The increasing amounts of tritium discharged into Long Island Sound means that Dominion's claim that it "does not anticipate any significant changes to radioactive releases or exposures from Millstone operations during the renewal period" is false. Therefore the NRC's conclusion that "impacts to the environment are not expected to change" is also false. (MPS-82-43)

Comment: Given this history, the NRC should mandate the immediate installation of filters to mitigate liquid tritium discharges from Millstone units 2 and 3. In addition, the NRC should mandate the testing of drinking water, well water and groundwater and in marine life in areas affected by Millstone for the presence of tritium. At present only sea water is tested for tritium.

Appendix A

Until these measures have been put into place and monitoring results have been made public until Millstone's current operating licenses expire, or units 2 and 3 permanently shut down, the NRC should not consider granting license extensions for Millstone units 2 and 3, in consideration of the health and safety of the public. (MPS-82-44)

Response: *Tritium releases during the renewal period are not expected to differ significantly from the releases that occurred during 2001–2004. Data from the Millstone Radioactive Effluent Release reports are provided in the following table. Tritium dose is reported as part of the whole body dose. The average maximum hypothetical whole body dose to a member of the public from all Millstone liquid effluent sources from 2001 through 2004, as shown in the following table, was 0.00305 mrem/yr or about 0.1 percent of the 10 CFR Part 50, Appendix I dose design objective. Additionally, despite the claims of some of the commenters, there is no commercially and economically viable method of separating tritiated water from natural water. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

Year	Unit 2 capacity	Unit 3 capacity	Tritium released U2 (Ci)	Tritium released U3 (Ci)	Total annual whole body dose all sources (mrem)	10CFR50, Appendix I annual dose design objective (mrem)
2001	95.3	80.8	755	518	0.00307	3
2002	81.3	86.4	207	1,330	0.00203	3
2003	80	98.8	624	654	0.00536	3
2004	97.6	88.2	265	1280	0.00175	3
4-year average	85.5	88.7	529	834	0.00305	-

Socioeconomic Impacts of Human Health

Comment: Yes, I do. I'm looking at I guess the economics of -- not just the economics of a town and what would happen to the taxes if it closed or stays open or whatever, but what about the economics of people with cancer? That's another economics that's factored in.

It caused people to get sick, and it cost the town and the insurance companies to pay for it, not just the tax benefit to having a nuclear power plant versus the cost to shut it down. So there's

the human side, plus the financial side. That's what I'm getting at. I think it's terribly important to those of us who have been impacted. (MPS-1-1)

Comment: Now, a time is opening up for us to change our ways. If we calculate the full cost of the ways we generate energy -- and I didn't hear the whole of the presentation, but I think the hidden costs were not mentioned, the health costs for instance, we learn that we can't afford to -- not to change our ways. (MPS-11-9)

Response: *Human health issues were evaluated in the GEIS and determined to be Category 1 issues. The staff determined in the GEIS the impacts to human health were SMALL. Health and socioeconomic information related to the area around Millstone was provided during scoping and the public comment period. This information was evaluated and did not constitute significant, new information. The staff determined the impacts to human health from operations during the license renewal period were SMALL. Therefore, cost impacts associated with health issues would also be expected to be SMALL. The comments provide no new information, therefore, were not further evaluated. No changes were made to the text of the SEIS.*

10. Comments Concerning Uranium Fuel Cycle and Waste Management

Comment: How can a decision be made on impact of spent fuel on the system when we have no real plan in this country for dealing with spent fuel?

The future of Yucca Mountain, which is the designated repository, is in doubt over many, many areas, both technical, legal, and environmental. And the possibilities of moving fuel to Yucca Mountain within the next 20 or 30 years seems very remote.

So how can we talk about the impact of spent fuel on this impact -- on this statement here when we don't have a real answer to it, other than to -- talking about putting it into dry cask storage on site, which, to me, makes the site a long-term repository for spent fuel which, my understanding is, is not allowed under the laws of Connecticut. (MPS-4-1)

Comment: In our view, site analysis should include, but not be limited to, stringent oversight of the physical plant, the management, detailed plans for transportation of fuel, and the final repository of waste materials, and placement of a plant in a remote location so that in the unlikely event of a catastrophe evacuation is feasible. We do not believe that this application meets those criteria. (MPS-9-1)

Comment: We are concerned also about the regulation and potential deregulation of what are termed "nuclear waste" and about the impact on Long Island Sound and the nation as a whole. (MPS-9-4)

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Comment: Not only do we have to be concerned about a nuclear accident or attack, but we also have no place to put the spent fuel, and this poses an entirely whole set of other problems. (MPS-10-6)

Comment: ... the obvious objection I had to this report is the separation of the waste issue from relicensing. And I did get to speak about that a little bit. High-level waste is a major problem that our government can't seem to solve in the nuclear industry. (MPS-18-12)

Comment: Although I think that dry cask storage of radioactive waste at the plant is preferable to keeping the waste in a "wet" pool, the fact is that this is not a long term solution to the problem of disposing of the waste. We do not have a long term plan for dealing with the radioactive byproducts of nuclear power plants, so I would prefer that we not renew any nuclear power plant facility license.

Please keep in mind that any solution so far proposed to dealing with radioactive waste is expensive and should be considered part of the operating expense of any nuclear power plant. It is not a separate and unrelated cost to the running of such a facility and should not be presented to the public as so. I do not wish for my taxpaying dollars in any way to continue to support the license of new or renewal of any nuclear power facility. (MPS-34-2)

Response: *Onsite storage of spent nuclear fuel is a Category 1 issue. The safety and environmental effects of long-term storage of spent fuel on site have been evaluated by the NRC and, as set forth in the Waste Confidence Rule (10 CFR 51.23), the NRC generically determined that such storage could be accomplished without significant environmental impact. In the Waste Confidence Rule, the Commission determined that spent fuel can be safely stored on site for at least 30 years beyond the licensed operating life, which may include the term of a renewed license. At or before the end of that period, the fuel would be moved to a permanent repository. The GEIS, NUREG-1437, is based upon the assumption that storage of the spent fuel on site is not permanent. This supplement to the GEIS for Millstone Units 2 and 3 is also based on the same assumption.*

Alternative methods exist, other than storage in the spent fuel pools, for safe interim storage of high-level waste onsite. Licensees can and have taken advantage of these alternative dry storage options. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.

Comment: Section 2.1.4 Radioactive Waste Management Systems and Effluent Control Systems Page 2-8, lines 27-29 Draft GEIS Supplement 22 Statement Millstone is in the process of obtaining a permit to construct a dry fuel storage area for additional spent fuel assemblies. Dominion Comment - Millstone has obtained the permit described above. It is suggested that

"is in the process of obtaining a permit to construct" be changed to "has constructed" so the sentence reads: "Millstone has constructed a dry fuel storage area for additional spent fuel assemblies." (MPS-47-4)

Comment: Section 2.1.4.3 Solid Waste Processing Page 2-12, line 3 Draft GEIS Supplement 22 Statement...volume was 24.3 m³ (858 ft³)... Dominion Comment - Change to: "... volume was 243 m³ (8580 ft³)... (MPS-47-5)

Comment: Section 2.1.5 Nonradioactive Waste Systems Page 2-12, Lines 11-12 Draft GEIS Supplement 22 Statement Dominion has petitioned the CTDEP to be classified as a small-quantity generator because of a reduction in the amount of waste generated at Millstone. Dominion Comment - Although Millstone generates hazardous waste at the rate of a small-quantity generator, the decision was made not to pursue classification as a small-quantity generator, in order to maintain flexibility in storage and shipping. It is suggested that this sentence be deleted. (MPS-47-6)

Comment: Section 2.1.5 Nonradioactive Waste Systems Page 2-12, Lines 17-19 Draft GEIS Supplement 22 Statement Common types of hazardous waste generated at Millstone are lead acid sludges and batteries, solvent rags, and sawdust contaminated with chemicals regulated under RCRA. Dominion Comment - Lead acid batteries and sawdust contaminated with chemicals are classified as Connecticut-regulated wastes. This sentence should be changed to the following: "Common types of hazardous waste generated at Millstone are aerosol cans, paint-related waste materials, and solvent rags." (MPS-47-7)

Response: The comments by Dominion concern details of Millstone's waste management systems and processes. The NRC staff reviewed and accepted Dominion's comments; Sections 2.1.4 and 2.1.5 were modified to reflect the comments.

Comment: Do you believe that true costs are considered when assessments, such as the one you are about to read of, are done? Pollution from mining, transportation, processing, waste products and their disposal as well as the health and environmental costs, etc. make up those unaccounted for costs. (MPS-80-1)

Response: *The comment relates to human health impacts from the fuel cycle. Chapter 6 of this SEIS addresses the environmental impacts of the uranium fuel cycle and solid-waste management during the license renewal term, which are listed in Table B-1 of Title 10 of the Code of Federal Regulations (CFR) Part 51, Subpart A, Appendix B, and are applicable to Millstone Power Station Units 2 and 3 (Millstone). The generic potential impacts of the radiological and nonradiological environmental impacts of the uranium fuel cycle and transportation of nuclear fuel and wastes are described in detail in the GEIS based, in part, on*

the generic impacts codified in 10 CFR 51.51(b), Table S-3, "Table of Uranium Fuel Cycle Environmental Data," and in 10 CFR 51.52(c), Table S-4, "Environmental Impact of Transportation of Fuel and Waste to and from One Light-Water-Cooled Nuclear Power Reactor." The staff also addresses the impacts from radon-222 and technetium-99 in the GEIS. The comment provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.

11. Comments Concerning Alternatives

Comment: The question of alternatives also bothers me. You seemed to set your priorities in the wrong direction. I may be wrong about that, but you mentioned first coal, gas, and all kinds of alternatives, which are not generally considered good alternatives.

You just barely touched on solar and wind, which, along with environmental conservation and energy efficiency, conservation and energy efficiency you didn't mention at all. And I wonder if that's in your -- was in your purview. (MPS-5-4)

Comment: ... where all the money and subsidies, our taxpayer subsidies -- including the Price Anderson Act -- will be going to these new plants, costing billions and billions of dollars, while that money, if we needed that much subsidy -- if we had that much subsidy going to clean energy, energy efficiency, solar, and wind, we wouldn't need a single oil plant or a nuclear plant. (MPS-5-6)

Comment: In addition, we find the centralization that this kind of energy represents to be unwise. Our centralized grid is brittle, vulnerable to blackouts and terrorism. Decentralized energy substations, using renewable energy, would help to make us safer. (MPS-11-4)

Comment: Our reading told us -- tells us -- and this I know is not -- not universally believed, but we believed it, and we studied this in depth. In combination with energy efficiency, methods of generating energy efficiently, and shifting to renewable sources, this can be done. It's not a myth. And other countries are already doing it.

So to relicense nuclear plants for another 20 years is to pull the rug out of initiatives to develop cost-effective renewable generation of energy, combined with change of policy for wise use. To pull the rug out -- this is to move the energy policy of the nation in the wrong direction. So we urge you: don't do this. (MPS-11-7)

Comment: Nuclear energy is expensive when the hidden costs are factored in. Expanding the use of renewable energy, combined with the creative design of wise years, is really the only way to go in the long run. (MPS-11-10)

Comment: Aside from my own, the engineers state that most renewable energy sources are expensive, unpredictable, and dangerous to the environment. Nuclear energy could be vital to addressing these environmental issues without creating others. (MPS-14-3)

Comment: There are alternative ways to generate electricity and Connecticut should be looking for those ways. In these uncertain times decisions can't always be about profits & shareholders. It must be more about safety and alternative ways to generate clean and efficient energy. (MPS-30-4)

Comment: If we really want to cut CO2 emissions we need to look at the big picture, wind, solar, geothermal, bio-diesel, methane from dumps used as a fuel source, forest /conservation, green building, etc. If we take a nuclear power plant off line, clearly any wind generated power will not make a dent in the CO2 until there is more electricity produced from the wind source than by the nuclear power plant ... and don't forget those hidden costs. (MPS-80-2)

Comment: The Connecticut, United States, and worldwide community demands are clear....it's time to phase out nuclear power. (MPS-81-1)

Comment: Can I interest you in something related to hydrogen fuel cells? (hydrogen produce from clean sources not nuclear) (MPS-81-6)

Response: *The comments relate to the environmental impact of alternatives. The SEIS for the Millstone Power Station presents the staff's analysis of the environmental impacts of the proposed action, i.e., renewal of the operating licenses for Millstone, and of reasonable alternatives. These impacts are presented in discrete resource areas so that environmental impacts can be compared between the proposed action and reasonable alternatives. The SEIS is not an evaluation of the best mix of energy generation sources for the Connecticut area or a determination regarding which mix would result in the least overall environmental impacts. The decisions regarding which generation sources to deploy are made by the licensee and State energy planning agencies, not the NRC. The viabilities of the various alternatives to renewal of the operating licenses for Millstone are pertinent to the discussion of alternatives to the extent that an alternative is considered reasonable. However, the staff recognizes that although some alternative energy sources, when considered by themselves, may not be viable replacements for Millstone, these alternatives could be part of a combination of generation sources that could replace Millstone. The many possible combinations could include combined-cycle gas-fired plants, clean-coal plants, renewable energy sources such as wind and solar power, and energy conservation. A likely combination of alternatives that includes 500 MW(e) gained from additional demand-side management measures was chosen for discussion in Section 8.2.6 of the SEIS. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

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Comment: I have to point out one blatant misstatement of fact before I step away. And that appears at page 843, where the NRC is arguing against wind power, against solar power, against conversion to same methods and has this to say about replacement power. This is section 8.2.4. This is talking about alternatives, "If available, purchased power from other sources could obviate the need to renew the Millstone OLs, operating licenses. It is unlikely, however, that sufficient baseload from power supply would be available to replace the Millstone capacity. Connecticut is a net importer of power." That is simply not true.

You don't attribute that statement to any source, but we would recommend that you go to the Web site of the Connecticut Siting Council. That is a State agency. Its responsibility under law is to create projections of electrical need and current generating capacity.

If you go to their Web site, you will see that there is not only no need to import power to Connecticut; power is exported. We have excess power. And even if we took out Unit 2 and Unit 3 from Millstone, we would continue to have excess power, even at times of peak demand. (MPS-23-12)

Response: *The statement in the Draft SEIS describing Connecticut as a net importer of energy is from the Dominion Environmental Report and is cited as "Dominion 2004" on the next line of the paragraph. The Connecticut Siting Council annual 10-year forecast shows that imported power is part of the energy supply mix for Connecticut. The text was revised to remove discussion of whether Connecticut is an importer or exporter of energy.*

Comment: Section 8.1 No-Action Alternative Page 8-4, Lines 26-27 Draft GEIS Supplement 22 Statement - When the plant stops operating, there will be a reduction in use of groundwater. Dominion Comment - The station itself does not use groundwater. The only use of groundwater is that used by the town of Waterford for seasonal irrigation of the ball fields. Therefore, closure of the plants would not necessarily result in a reduction in the use of groundwater. (MPS-47-53)

Comment: Section 8.2.5.10 Utility-Sponsored Conservation Page 8-50, Line 18 Draft GEIS Supplement 22 Statement - Dominion participates in State-wide residential, commercial, and industrial programs to reduce... Dominion Comment - Dominion is not the local distributor of electricity. It is suggested that "Dominion participates in" be replaced with "Connecticut has" so the sentence reads: "Connecticut has State-wide residential, commercial, and industrial programs to reduce..." (MPS-47-54)

Response: *The comments related to alternatives by Dominion were reviewed and accepted by the NRC staff. The text in Sections 8.1 and 8.2.5.10 of the SEIS have been revised to reflect the comments.*

Comment: In their comparisons of alternative methods of electricity production, I could not find a chart showing total dollar costs for production by the various alternative means. When considering environmental costs, I feel that nuclear waste and the production of depleted uranium are the most undesirable. The cost of electricity keeps rising for Connecticut residents. As a citizen of this state I would prefer to pay more if the power came from more environmentally friendly method of generation. (MPS-48-1)

Comment: Dominion has not provided a comparative analysis and assessment of life cycle energy consumption to determine that re-licensing of Millstone is the preferred option. Nor, has Dominion considered cumulative alternatives (i.e., energy sources) to meet the current and future energy demands. (MPS-49-1)

Comment: Also, the State of Connecticut has enacted legislation that mandates a move to Clean, Renewable energy (referred to as Class I renewable). This plant does not meet this criteria. The denial of this extension would go a long way to improving the health and environment of Ct as well as exepiting [sic] the move to Clean Energy. (MPS-62-3)

Response: *The comments relate to possible energy alternatives. Impacts from reasonable alternatives for Millstone are evaluated in Section 8.0 of this SEIS. NRC's responsibility is to ensure the safe operation of nuclear power plants and not to formulate energy policy or encourage or discourage the development of specific alternative power generation. The staff's evaluation of alternatives is limited to an assessment of their environmental impacts. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

Comment: 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 NOx emissions are a particular 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. (MPS-77-1)

Response: *The comment is related to a concern about the impact to air quality if a fossil-fueled electrical generation alternative was selected. Impacts from reasonable alternatives for Millstone license renewal including coal and natural gas-fired electrical generation alternatives are evaluated in Sections 8.2.1 and 8.2.2. The comment provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.*

12. Comments Concerning Postulated Accidents

Comment: Price Anderson -- I don't know what the fund is now, but it's probably around \$9 billion. But it's been estimated that an accident on the scale of the Chernobyl accident, or something like it, probably runs into \$3- or \$4- or \$500 billion. And so there's no cost-benefit there, and that's not even mentioned in this impact statement. (MPS-4-4)

Response: *The comment relates to the Severe Accident Mitigation Alternatives (SAMA) cost-benefit analyses in Chapter 5 of the SEIS. As discussed in Chapter 5, Dominion performed these analyses in accordance with NRC's guidelines for performing cost-benefit analyses, NUREG/BR-0184, "Regulatory Analysis Technical Evaluation Handbook." The funds available under the Price Anderson Act are not included in SAMA cost-benefit analyses. The comment provides no significant new information; therefore, the comment was not evaluated further. No revision was made to the text of the EIS.*

Comment: I want to ask you whether you include what the administration, the present administration of our country, is constantly beating on, and that is the question of sabotage and

terrorism, and now the question of natural disasters by the way they're -- the disaster in the Indian Ocean included a nuclear plant. And have you considered all these aspects in your report? (MPS-5-4)

Comment: I'm concerned because the entire plant is built on an ancient earthquake fault. The probabilities of movement, seismic movement, are there. How could you possibly calculate that that was of low impact? (MPS-6-1)

Comment: You talk about, you know, tsunamis being of a low, you know, statistical value. However, earthquakes are not of low statistical value. That can happen at any time. But, you know, these acts of nature are something that we don't have any control over.

If we were to experience what was just experienced a couple of weeks ago in the Asian countries, how in the world are we going to handle something like that? That is going to -- you know, the earth is going to open up. Those buildings that are moved we're going to have leakage of any containment that's inside of the buildings. (MPS-6-2)

Comment: It would be a sequential event. We would have an earthquake, which would be followed by flooding, which would be followed by interruption of the structures. We'd have openings for that radioactive element to be exposed into the environment. How can that be put down as, you know, just a small thing of value, or small impact? (MPS-6-3)

Comment: We are also worried about a nuclear accident. Old machines are fallible, as are the human beings who run them. We only need to look at the Davis-Besse in Ohio to understand the potential of what may occur without even the awareness of nuclear plant operators. (MPS-11-3)

Comment: I noticed that you talk about things that could happen with the reactor, but you don't mention any fires in the spent fuel pool or any act by a malicious individual on the spent fuel pool.

And those are accidents that would still be possible with Millstone in the license renewal period, whether it was in the wet storage of the proposed dry cask storage. (MPS-18-2)

Comment: Aside from the malicious thing I brought up -- I'm sorry I did at this point -- I still feel that the spent fuel pool having an accident on its own without anybody provoking it is still not a severe accident in your report. And so I have a contention with that. (MPS-18-3)

Comment: My point is you are adding 20 more years of spent fuel to this mix of what you have already got. So it is going to increase the risk. (MPS-18-4)

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Response: *The comments relate to the range of accidents evaluated in Chapter 5 and Appendices H and I of the SEIS. Chapter 5 and Appendices H and I discuss the Probabilistic Risk Assessment (PRA) and external event analyses that formed the bases of Dominion's SAMA analyses for Millstone. Seismic events were included in the evaluation of external events. Component failures and human errors were evaluated in the PRA. Event sequences leading to damage to the spent fuel pool were not addressed in the PRA because studies have shown that the risk to the public from spent fuel pool accidents is much less than from reactor core damage accidents.*

Sabotage and terrorist events are not evaluated in the PRA because of the large uncertainties in the probability of occurrence. Also, sabotage and terrorism are outside the scope of the license renewal process. The comments provide no significant new information; therefore, the comments were not evaluated further. No revision was made to the text of the SEIS.

Comment: In the event of a severe accident at Millstone the probability of weighted consequences of a release to groundwater is stated to be small (Supplement 22, page 5-4). However, there is a potential for radioactive fallout directly onto the surface water bodies that serve as the Fishers Island water supply. Radiological monitoring and the provision of an alternative public water supply for these Suffolk County residents are not addressed in the document.

Dominion estimates that the dose to the population within 50 miles of the Millstone site from severe accidents to be between 12.8 and 17.4 person-rem. What is the expected dose to county residents living on Fishers Island and the North Fork that are considerably closer proximity and what health risks are posed by this exposure? (MPS-52-6)

Response: *Groundwater is the normal public water supply for Fishers Island; however, there is a pond on the island that is available as a supplemental public water supply. It is sometimes used when the number of visitors to the island increases, such as during the summer. The MACCS2 code does have the capability to calculate population doses from drinking water from surface water bodies contaminated by direct deposition of radionuclides during a severe accident. Dominion did not perform such calculations for the SAMA analyses, and the staff did not request such calculations. In calculations for other plants, population doses from the direct deposition on the surface water – drinking water pathway were found to be insignificant compared to the inhalation and direct deposition – groundshine dose pathways. Also, emergency planning decisionmakers could interdict the use of water from this pond and provide safe drinking water supplies from outside the affected area after a severe accident.*

Comment: Appendix H Page H-1, Lines 17-18 Draft GEIS Supplement 22 Statement - ... or were related to a reactor coolant pump (RCP) seal loss of coolant accident (LOCA). Dominion Comment - "loss of coolant accident (LOCA)" should be replaced with "dependency on charging

pumps" so the sentence reads: "...or were related to a reactor coolant pump (RCP) seal dependency on charging pumps." (MPS-47-55)

Response: *The comment by Dominion provides a more accurate description of Millstone's safety systems. The staff reviewed and accepted the comment. Appendix H of the SEIS has been revised based on the comment.*

13. Comments Concerning Issues Outside the Scope of the Environmental Review for License Renewal: Emergency Response and Preparedness, Safeguards and Security, Operational Safety, Aging Management, Need for Power, and Regulatory History

Emergency Response and Preparedness

Comment: And the other question was evacuation. I always laugh at evacuation, because as far as I know, there has never been -- in a nuclear plant in this country, there has never been a full-scale drill as to what evacuation would -- how it would occur. I know they have had drills with the first responders and that type of thing, but the public, who are the people who are supposed to be protected by this evacuation plan, have never been involved in an evacuation plan. (MPS-4-5)

Comment: I want to ask you whether you include what the administration, the present administration of our country, is constantly beating on, and that is the question of sabotage and terrorism, and now the question of natural disasters by the way they're -- the disaster in the Indian Ocean included a nuclear plant. And have you considered all these aspects in your report? (MPS-5-5)

Comment: I object that the GEIS contains no evacuation plan for the residents, or no reference to evacuation, for residents of Southold town or elsewhere on eastern Long Island.

The geography of Long Island creates an extremely dangerous situation for those residents. I don't know if you know anything about Long Island, but we can't get off of Long Island on your average work day in an organized fashion. You try and get on the Long Island Expressway and head to Manhattan between the hours of 6:00 and 8:00, and you're going to be sitting in a parking lot.

Throw a little release of radioactive material in that parking lot, and now it turns to a mess of cars tailgating and creating incredible accidents and anxiety among the people. At the very end of a narrow strip of land there is only one direction to travel in the case of an emergency. I'm just speaking specifically about the town of Southold and the North Fork.

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At the end of this very strip of land, one direction to travel in the case of an emergency, and that direction is west. (MPS-8-4)

Comment: I am requesting that a fully-funded Federal emergency management study of Southold town's unique geographic challenges, and how this relates to the threat of a radioactive release at the Millstone power plant, be undertaken as part of this GEIS, and that the GEIS be considered incomplete without it. (MPS-8-5)

Comment: And in the GAO, which, mind you, is a federally -- is a Federal agency, the GAO reports -- this is a compliance review matrix for Fisher's Island, which is a little teeny island out in Fisher's Island Sound that happens to fall within my jurisdiction.

Here are the requirements: identifies local, Federal, and private sector organizations that are part of the overall responsible organization. This is in response to the possibility of an evacuation for the residents of my community. Requirement met or not met? Not met. These agencies are not clearly identified.

Functions and responsibilities for major elements in emergency response specified for each organization and key individuals by title. Not met. The plan does not cite the legal basis for the key elements in emergency response.

This goes on and on and on as to the inadequacies that exist within the emergency management plan for a small island of 275 people that I represent. And the GAO says it's inadequate. Your EIS says you don't have to address it. Where do we meet on this? Who has to address it, then? The Federal Government said it's inadequate, and Dominion and the NRC say it's all right, it's an ongoing process. (MPS-8-8)

Comment: The NFEC membership is very concerned that our location, some 10 to 11 miles south of this facility, will place in grave danger in the event of an unplanned evacuation.

Any severe accident evaluation, or evacuation plan which does not include the North Fork of Long Island, is deficient. (MPS-9-2)

Comment: As stated before, some North Fork residents live as close as 12 miles to the Millstone reactors, yet there are no plans in place to ensure the safety of these residents if there were an incident at the Millstone facility.

Because the North Fork is essentially a peninsula surrounded by water on three sides, we have only one direction to evacuate. That's west. Residents of Orient -- and I have a map, I'm going

to submit it probably later on for -- for the record. Residents of Orient have only one road leading west until Greenport. There are only two roads from Greenport to Mattatuck, and three from Mattatuck to River Head.

In the event of an emergency, evacuation of the 22,000 year-round residents and 30,000 summer residents would be virtually impossible, not to mention the hundreds of thousands of Long Island residents who live to the west and who would also be evacuated. Because evacuation of Long Island is impossible, the Shoreham nuclear power plant was shut down. Many of us live closer to Millstone than to Shoreham. (MPS-9-3)

Comment: Currently, there is no plan -- plans in place to notify Long Island in the event of a nuclear accident. Legislation should mandate a 50-mile radius notification system.

Lack of an evacuation plan. And I'm not saying anything here that you haven't heard already, but you have to understand the importance of this. So there is no evacuation plan that will ever safely evacuate Long Island in the event of a nuclear accident. (MPS-10-2)

Comment: Finally, I would ask that the comments that were made at the beginning of the meeting regarding the exemption of the emergency preparedness and the security issues associated with the plant that are not included in this be addressed as to the reason why, in the abstract, (MPS-13-3)

Comment: I respectfully submit that the abstract or some portion of the report address the absence of the security and the emergency preparedness elements of environmental issues from the report so the public is assured that something is going on and that it is just not being addressed in this report. (MPS-24-4)

Comment: The draft Environmental Impact Statement (EIS) being prepared by the Nuclear Regulatory Commission (NRC) with respect to the license renewal does not address some highly-related issues such as the Evacuation Plan. The current evacuation zone does not include the effect of a major release and its effect on Connecticut and its cities such as New Haven, only about 40 miles from the plant, nor does it consider the proximity of Long Island only a few miles away across the Sound where evacuation has been shown to be impossible. (MPS-28-3)

Comment: Until Long Island has and evaluation plan we should not have nuclear power plants operating within 100 miles of us. As I have learned, it's not if there will be an accident it's just when will it be. 911 should have taught us all that we are so vulnerable. (MPS-31-1)

Comment: I wish to share with you my serious concerns that Millstone's operation poses a serious risk to the residents of the North Fork of Long Island. Without an emergency plan in

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place that expands the current 10 mile radius to a 50 mile radius including the North and South Forks, there should be no consideration of renewing Millstone's contract. In the event of an accident or terrorist attack, Long Island is currently extremely vulnerable. We must ensure that safety of the residents of Eastern Long Island. Therefore, I strongly oppose renewing the contract of The Millstone Power Station. (MPS-32-1)

Comment: However, should the license be renewed, I believe it is imperative that the NCR expand the scope of its evacuation plant to a 50-mile radius to include all of Long Island. (MPS-35-2)

Comment: I am writing to voice my strong objection to the Millstone license renewal without making a plan for the evacuation of Long Island's north shore—within the 10 mile radius of Millstone This is unacceptable. (MPS-36-1)

Comment: However, should the license be renewed, I believe it is imperative that the NCR [sic] expand the scope of its evacuation plant to a 50-mile radius to include all of Long Island. (MPS-37-2)

Comment: It is my understanding that the Nuclear Commission in the State of Connecticut have no plants [sic] for notification of residents who reside in a ten to fifty mile radius in the event of a nuclear malfunction. A plan for evacuation of this area is vital. Without a plan for viable evacuation, the plant should be shut down. (MPS-38-2)

Comment: We are very concerned that there is no apparant [sic] notification system in place - we site the recent fire, and site evacuation in Jan. 2005. There are no policies in places to notify neighboring states, this is a huge concern of ours. As residents of New Jersey, we would want to be fully advised, and alerted to when public meetings are being held to discuss/debate the renewal of the license. (MPS-40-2)

Comment: In the event of an emergency, Fishers Island's residents are to be evacuated to either New London or Stonington Harbor and be bused north to Windham, CT. What is the fate of researchers and operations at Plum Island in the event of a severe accident at Millstone? A 50-mile Ingestion Planning Zone is identified in the State of Connecticut's Radiological Emergency Plan in the event that a nuclear plant release is carried beyond 10 miles. This EPZ encompasses virtually all of Suffolk County east of the William Floyd Parkway in Brookhaven Township. Although ingestion suggests an assessment of food and drinking water, a release carried southward to Suffolk County is likely require additional public protective actions, up to and including evacuation. This had been deemed infeasible during the public discourse concerning the Shoreham nuclear plant due to the lack of adequate transportation infrastructures. Since that era, no new major east-west transportation facilities have been constructed, and there has been a significant increase in the population of eastern Suffolk

County. Evacuation of eastern Suffolk County remains an infeasible scenario, a fact we consider to be a major factor impeding renewal of Millstone's operating licenses. (MPS-52-3)

Comment: There are no emergency plans in place for Long Island in the event of an incident or accident at the facility. The DEIS ignores the safety threats to Long Island residents and the environmental impacts of the aging reactors. (MPS-53-2)

Comment: Nuclear energy has its attributes but plants should be located in sensible areas where evacuation in case of emergency is possible. (MPS-55-1)

Comment: There is no plan in existence for a safe evacuation from Long Island in spite of the fact that it is 11 miles away. Shoreham was shut down for just that reason. (MPS-56-4)

Comment: The Millstone Draft Environmental Impact Statement is completely silent on impacts to Long Island. There are absolutely no evacuation plans in place for Long Island. (MPS-57-2)

Comment: If renewed, these reactors will be up and running for another 20 years, yet there are no emergency plans in place for eastern Long Island in the event of an incident or accident at the facility. The Millstone DEIS is complete silent on impacts to Long Island. Shoreham did not come on line because we couldn't put an evacuation plan in place. (MPS-58-2)

Comment: If renewed, these reactors will be up and running for another 20 years, yet there are no emergency plans in place for eastern Long Island in the event of an incident or accident at the facility. The Millstone DEIS is complete silent on impacts to Long Island. Shoreham did not come on line because we couldn't put an evacuation plan in place. (MPS-59-2)

Comment: As a resident of the North Fork of Long Island it is unacceptable to me that Millstone be allowed to operate without a workable evacuation plan in place for my township. (MPS-60-2)

Comment: There is no way we can be safely evacuated, should there be a problem, the communications of warnings between the states seem to be nearly non-existent (MPS-63-2)

Comment: There is no evacuation plan for eastern Long Island, (MPS-64-2)

Comment: The Millstone draft Environmental Impact Statement is completely silent on impacts to Long Island. This gross omission by the NRC is reason to deny re licensing on this basis alone. Meaning if and when there is a nuclear event (and there was one on January 14, 2005), they do not have to notify Long Island who is just 10 miles south of the Millstone along the Long

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Island Sound. Shoreham did not come on line because we couldn't put an evacuation plan in place. Millstone is our Shoreham!! (MPS-66-2)

Comment: They do not have an emergency [sic] evacuation plan for where I live on Long Island. (MPS-67-2)

Comment: If renewed, these reactors will be up and running for another 20 years, yet there are no emergency plans in place for eastern Long Island in the event of an incident or accident at the facility. I also understand that the DEIS for this relicensing ignores the safety threats to Long Island, New York residents and the environmental impacts of the aging reactors.

The Millstone DEIS is completely silent on impacts to Long Island. A nuclear power plant in Shoreham, Long Island did not come on line because an evacuation plan could not be put in place, particularly for Eastern Long Island. (MPS-68-1)

Comment: I live less than 25 miles from Millstone, in an area that is downwind from the plant several months a year. There is no question my family would be directly impacted in the event of any accident or a terrorist attack. (MPS-70-1)

Comment: This safety issue falls squarely under the topic of severe accident mitigation, which the DEIS is mandated to analyze in detail. However, completely omitted from all review was the topic of an evacuation plan for the residents of Southold Town or elsewhere on eastern Long Island. The reason for such omission is simple; no such plan exists, nor has one ever been studied or even considered. The geography of Long Island creates an extremely dangerous situation for those residents in the case of a severe accident at Millstone. At the very end of a narrow strip of land, there is only one direction for these residents to travel in the case of an emergency -West. There is, in some cases, only one road on which to travel -New York State Route 25 in the event of a Millstone-induced emergency, Southold residents will be unaccounted for by the NRC. By the time Southold residents evacuate and reach the mainland of Long Island, we will be lined up on the Long Island Expressway behind the literally millions of other Long Island residents who have the same one and only direction to travel. This is a "natural recipe for a manmade disaster" that must be avoided.

To the extent that the drafters of DEIS seek to avoid creating an evacuation plan for the Town of Southold and eastern Long Island on the purported grounds that federal regulations only require such plans to do so within a 10 mile radius, they should and must consider the extreme circumstances that are present. The North Fork of Long Island is directly across the Long Island Sound. Strong prevailing winds blow across the water directly to our shores. We are the first affected residents to the south of this plant. To say that we are beyond the affected area is just wrong and cannot be the basis for a proper EIS. With that knowledge, I believe it is

imperative that the NRC expand the scope of its evacuation planning to include the residents of the Town of Southold and other affected areas of eastern Long Island. (MPS-72-2)

Comment: Residents, civic and environmental groups have joined many elected officials from the East End and across Long Island and called for the extension of the emergency planning zone from the current 10-miles radius to a 50 miles mile radius. By doing so, emergency planning for the North Fork would be required.

Because the North Fork is essentially a peninsula, surrounded by water on three sides, we have only one direction to evacuate west. Residents in Orient only have one Road heading west until Greenport. There are only two roads from Greenport to Mattituck, three from Mattituck to Riverhead. In the event of an emergency, evacuation of the 20,000 year round North Fork residents, or 30,000 summer residents would be virtually impossible not to mention the hundreds of thousands of Long Island residents to the west. Because evacuation of Long Island is impossible, the Shoreham Nuclear Plant was shut down. Many of us live closer to Millstone than to Shoreham. (MPS-73-3)

Comment: I am saying NO to this proposed Millstone license renewal. One can hardly get off Long Island now without there being a catastrophe! This renewal would put too many lives here on Long Island in danger should anything happen at the Millstone Nuclear plant...There is no feasible escape route possible for so many Long Island inhabitants. A NUCLEAR LEAK OR ACCIDENT WOULD BE WORSE THAN A TSUNAMI HITTING LONG ISLAND!!! NO, NO, NO TO THIS RENEWAL! (MPS-76-1)

Comment: If an accident happened we could not evacuate the population (we can't even get home during rush hour). We have no way to deal with the contamination should an accident occur. (MPS-81-2)

Response: *The comments are related to emergency preparedness issues. The staff considered the need for a review of emergency planning issues in the context of license renewal during its rulemaking proceedings on 10 CFR Part 54, which included public notice and comment. As discussed in the Statement of Considerations for the rulemaking (56 FR 64966), the programs for emergency preparedness at nuclear plants apply to all nuclear power plant licensees and require the specified levels of protection from each licensee regardless of plant design, construction, or license date. The requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50 are independent of the renewal of the operating license and will continue to apply during the license renewal term.*

Through its standards and required exercises, the Commission ensures that existing plans are adequate throughout the life of any plant, even in the face of changing demographics and other

site-related factors. Therefore, the Commission has determined that there is no need for a review of emergency planning issues in the context of license renewal. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no change to the text of the SEIS.

Safeguards and Security

Comment: The nuclear power plants are targets for terrorism, and we haven't even touched on that. Okay? The terrorists certainly know where all of our weak spots are. And a nuclear power plant just screams. You just may as well leave the keys in the car with the lights on and just let it happen, because that is what -- you can talk about all of the reinforcing, and you can talk about all that good stuff, but the reality is it doesn't work. And for anyone to try to make us think it will is also very disingenuous. (MPS-10-4)

Comment: And let me just say it only takes one catastrophic event, whether by nuclear accident or terrorist attack, to devastate this region. (MPS-10-5)

Comment: PACE -- People's Action for Clean Energy -- a Connecticut State organization since 1974, representing 2,400 constituent households, strongly and adamantly opposes the relicensing of Millstone. Our Board of Directors, members, and supporters are extremely concerned about terrorism. We've heard this before.

The spent fuel pools at nuclear plants are not adequately protected. In fact, we view nuclear power plants as weapons of mass destruction only waiting for terrorists to detonate them. (MPS-11-1)

Comment: Lastly, continuous operation of nuclear power plants creates more waste. Even if we send waste to Yucca Mountain, a seismic area, more waste will be created in Connecticut that will remain to hurt us or to tempt terrorists. (MPS-11-5)

Comment: ... it is an environmental impact if a terrorist attack, for example, releases -- and I have a big problem. That is my principal concern for coming tonight. The gentleman up there said you cannot quantify it, and that is correct.

But I think that the way I would quantify it is very high. You quantify it looking pre-9/11 in the report. And you use the word "small" and you define small. I think that is a big error.

I realize that the NRC is addressing it, but I think that it has to be in an environmental impact statement because it is the biggest threat to the environment, far greater than any of these SAMAs. (MPS-19-1)

Comment: I have a big problem with the Commission's standpoint that the staff basically at this level isn't going to deal with the clear terrorist threat to the nuclear power plants in the country. And so my comments are generic about that. And they're specific about the threat to Millstone. (MPS-19-3)

Comment: My concerns with the EIS are primarily section 5 and what I said earlier. It's complete ludicrously to just ignore and quantify it as small and SAMA as a terrorist attack. (MPS-19-4)

Comment: Terrorism is certainly one major omission. (MPS-23-2)

Comment: ... there is palpable concern within this community regarding the security of the nuclear power installation, not so much the dome, more the spent fuel. (MPS-24-2)

Comment: I respectfully submit that the abstract or some portion of the report address the absence of the security and the emergency preparedness elements of environmental issues from the report so the public is assured that something is going on and that it is just not being addressed in this report. (MPS-24-3)

Comment: I did want to support the objections that people have made or their concerns regarding security. (MPS-25-1)

Comment: This is doubly alarming now that we face likely threats of terrorism on our own soil. Millstone is essentially a Weapon of Mass Destruction waiting to be detonated! (MPS-26-2)

Comment: Terrorism and sabotage are not included in the draft EIS even though these plants can be prime targets with their highly-radioactive spent fuel stored in unprotected pools or, as approved, in dry cask storage on the reactor site. (MPS-28-4)

Comment: I have grave concerns about the safety of this power plant. In the event of a terrorist attack, the impact to the tri state area would be devastating. I would hate to have something occur as it relates to terrorism and this Power Plants, to find that my concerns are correct. (MPS-30-2)

Comment: The nuclear site also makes us a target for terrorist activity, which is certainly a concern in today's world. (MPS-65-4)

Comment: It is common knowledge that nuclear power plants and the adjacent spent fuel pools are vulnerable to terrorist attack. In addition to living in close proximity to Millstone, North Fork residents live very close to other potential terrorist targets including the Plum Island Animal Disease Center (PIADC). If there were an incident at the Millstone Facility, there are no

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emergency plans in place for PIADC. The NRC would be negligent if these facts were not considered in your deliberations. (MPS-73-4)

Comment: And now we have to spend money on terrorist precautions. (If nuclear power was so safe, why do we have to worry about terrorists attacks? I've never heard of a terrorist attack on a solar panel). (MPS-81-5)

Comment: In 2001, terrorists who had targeted nuclear power plants hijacked a passenger jet and flew over the Indian Point Nuclear Power Plant 29 miles of New York City before slamming into the World Trade Center. The U.S. Department of Homeland Security, subsequently created, designated the Millstone Nuclear Power Plant a terrorist's target of choice. (MPS-82-25)

Comment: In 2004, Dominion rejected the U.S. Department of Homeland Security's offer of a free security enhancement to protect the three Millstone intake structures from terrorist attack. (MPS-82-29)

Response: *The comments are noted. In a recent decision in another license renewal proceeding, the Commission discussed the terrorism and sabotage issues raised in the comments. See Duke Energy Corp. (McGuire Nuclear Station, Units 1 & 2; Catawba Nuclear Station, Units 1 & 2), CLI-02-26, 56 NRC 358 (2002). In that decision, the Commission found that NEPA imposes no legal duty on the NRC to consider intentional malevolent acts on a case-by-case basis in conjunction with commercial power reactor license renewal applications. The Commission concluded that the "environmental" effect caused by third-party miscreants is simply too far removed from the natural or expected consequences of agency action to require a study under NEPA.*

The Commission has also indicated that terrorism differs from matters ordinarily considered in an EIS. An EIS may discuss, for example, such matters as likely effects on local water, air quality, vegetation, wildlife, culture, and socioeconomic concerns. These effects are reasonably certain; an EIS can quantify them to a fair degree of precision. Terrorism, by contrast, comes in innumerable forms and at unexpected times and places. It is decidedly not predictable, and it is not a natural or inevitable by-product of the granting of an application. For these reasons, the Commission has stated that an EIS is not an appropriate format in which to address the challenges of terrorism.

In its recent license renewal decision, the Commission also noted that, particularly in the case of a license renewal application, where reactor operation will continue for many years regardless of the Commission's ultimate decision, it is sensible not to devote resources to the likely impact of terrorism during the license renewal period, but instead to concentrate on how

to prevent a terrorist attack in the near term at the already licensed facilities. Finally, the Commission determined that there appears to be little practical benefit in conducting a license renewal terrorism review.

Nevertheless, the Commission did indicate that its decision not to use NEPA as a vehicle for a terrorism review does not mean that it is ignoring the issue. Rather, the Commission is closely examining the current security and protective framework and already has ordered interim improvements at licensed nuclear facilities, including reactors. The Commission expects further improvements as the internal comprehensive review moves forward. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no change to the text of the SEIS.

Operational Safety

Comment: My father was a pipefitter at Northeast Utilities for over 20 years. He saw many violations of safety, and he became a whistleblower because he couldn't tolerate the way things were done at the plant any longer. He was fired for reporting those safety concerns. (MPS-6-4)

Comment: We really believe the plants are safe. I believe they're safe, and I can see the tower from my house. And I brought up my family, and about 1,200 people who work at Millstone, who live in the community, they're not fools either. (MPS-12-3)

Comment: Recently, the American Society of Mechanical Engineers endorsed nuclear power as a safe and efficient source for supplying energies, and addressing our growing needs. Aside from my own support for renewable energy -- and my record over the 12 years certainly indicates my support for renewable energy, including the restructuring bills. (MPS-14-2)

Comment: So what I am trying to put into the record on behalf of Nuclear Energy Advisory Council is the report to the public is that since the restart of the Millstone plants, Millstone's 2 and 3, they have been operated in a safe manner. In fact, based on that performance, there is no reason why I would recommend to the Nuclear Energy Advisory Council that the council vote to oppose the continued licensing of the plant. (MPS-24-1)

Comment: After a hearing in Waterford on Jan.11, a fire broke out Jan.14 highlighting the vulnerability of these aging plants. (MPS-28-2)

Comment: In 2000, Northeast Utilities acknowledged that -- even under daily supervision by onsite inspectors of the NRC -- it had lost two highly radioactive spent fuel rods from the Unit 1 spent fuel pool. (MPS-82-22)

Response: *The NRC's environmental review is confined to environmental matters relevant to the extended period of operation requested by the applicant. Operational safety is outside the scope of this review. An NRC safety review for the license renewal is conducted separately. Although a topic may not be within the scope of review for license renewal, the NRC is always concerned with protecting health and safety. Any matter potentially affecting safety can be addressed under processes currently available for existing operating licenses absent a license renewal application. The comments do not pertain to the scope of license renewal as set forth in 10 CFR Parts 51 and 54. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

Aging Management

Comment: NRC regulations limit commercial power reactor licenses to 40 years, but also permit such licenses to be renewed where appropriate. In the case of Millstone, however, renewal for 20 years is not an appropriate public policy decision. The NRC recognizes that some structures and components of nuclear plants may have been engineered on the basis of an expected 40-year service life. Suffolk County is not reassured by the assumption made by the NRC in NUREG-1437, Vol. 1, section 5.3.1.

"In assessing the impact on the environment from postulated accidents during the license renewal period, the assumption has been made that the license renewal process will ensure that aging effects on the plant are controlled and that the probability of any radioactive releases from accidents will not increase over the license renewal period."

This does not appear to be a credible position in light of Dominion's statement (Supplement 22, page xviii) that it "did not identify any major plant refurbishment activities or modifications as necessary to support the continued operation of Millstone for the license renewal period." The county has difficulty reconciling the two positions that, 1) the NRC will "control" the effects of an aging plant forty years into the future, and yet 2) Dominion foresees no major maintenance activity as necessary for safe operation through the year 2045. (MPS-52-4)

Response: *Major refurbishment is a class of activities which typically occur only once in the life of a nuclear plant, such as replacement of PWR steam generators. As discussed in Chapter 3 of this SEIS, there are no planned major refurbishment actions. These major refurbishment activities are separate from activities associated with aging management. Safety matters related to aging are outside the scope of this environmental review. The comment does not pertain to the scope of license renewal as set forth in 10 CFR Parts 51 and 54. The comment provides no new and significant information; therefore, the comment was not evaluated further. There was no revision to the text of the SEIS.*

Need for Power

Comment: As you know, Millstone is a vital component of New England's energy infrastructure and provides the equivalent of roughly 48 percent of Connecticut's electricity, which is enough to meet the needs of more than one million homes and businesses without generating greenhouse gases that contribute to global warming. (MPS-7-1)

Comment: We do need electricity. Millstone produces close to the equivalent of 50 percent -- think about that -- 50 percent of the electricity Connecticut uses on a daily basis. (MPS-12-1)

Comment: One way or another, we need electricity. We need electricity to conduct our businesses. We have set up a huge infrastructure. Our huge way of living is dependent on this. And we can continue to explore the many, many other alternatives, alternate power sources. And we should do that, but it's undeniable that, certainly at this point in time, this is what we have to go ahead and do. And I want to support it. (MPS-20-2)

Comment: First, from a regional and Connecticut energy needs point of view, Millstone has been an essential resource for the existing bulk power system. This essential resource need is expected to continue as such into the future. (MPS-79-2)

Comment: Keeping Millstone operational greatly adds to the diversity of fuel supply in Connecticut and the region. (MPS-79-3)

Response: *The comments are related to the need for power. The need for power is outside the scope of the SEIS analysis. Need for power is excluded from consideration in license renewal pursuant to 10 CFR 51.53(c)(2). Decisions about the ongoing need for power and operation of a nuclear power plant during the license renewal period are the responsibility of the State and the licensee. The comments provide no new and significant information; therefore, the comments were not further evaluated. No revision was made to the text of the SEIS.*

Regulatory History

Comment: They violated the Clean Air Act and, in April 2003, Dominion -- VEPCO agreed to a \$1.2 billion enforcement settlement. \$1.2 billion -- that's about the same as they paid for Millstone -- with the U.S. Department of Justice and the U.S. EPA for violations of the Clean Air Act.

The EPA charged VEPCO with failing to obtain the requisite permits for significant modifications it made to its coal-fired power plant in West Virginia that resulted in increased power generating

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capacity. The Clean Air Act requires that such modifications be accompanied by the installation of pollution control equipment to mitigate environmental contamination.

Well, VEPCO neglected to install such equipment, which according to the EPA resulted in the release of "massive amounts" of sulfur dioxide, nitrogen oxide, and particulate matter. So, obviously, they're not going to do it of their own free will, if they did that kind of massive pollution in West Virginia. (MPS-3-12)

Comment: Dominion has a poor environmental record having been fined for having hidden violations of the Clean Air Act at another of its facilities. (MPS-28-7)

Comment: Yet, according to research by Public Citizen, a public-interest organization based in Washington, D.C., Dominion's record has proved otherwise.

According to Public Citizen, in April 2003, a Dominion subsidiary agreed to pay \$1.2 billion in a settlement with the U.S. Department of Justice when it violated the Clean Air Act by increasing power-generating capacity of a huge coal-fired power plant in West Virginia without obtaining mandatory permits.

A year later, according to Public Citizen, Dominion paid a \$500,000 civil penalty and had to offer a \$4.5 million refund to its customers after the U.S. Federal Energy Regulatory Commission (FERC) caught the company violating federal regulations. (MPS-46-7)

Comment: Together with Unit 1, these reactors have had an operational history since 1970 which is among the ugliest in the annals of the nuclear industry. Millstone's radioactive releases have been among the highest of all nuclear reactors in the United States. Millstone's routine radiation releases were linked early-on with cancers and other diseases. Millstone's treatment of its workforce by way of exposing it to unnecessary radiation levels and its treatment of nuclear whistleblowers by ostracism and retaliatory firings have made it notorious within the nuclear industry. While full-time inspectors from the NRC were onsite, Millstone lost two highly radioactive spent fuel rods. These irradiated rods contain plutonium and other fission elements which may be diverted to create dirty bombs. While Millstone's environmental monitoring program was being monitored by the NRC and Connecticut's Department of Environmental Protection ("DEP"), Millstone's personnel brazenly falsified environmental monitoring reports to the NRC and DEP and sabotaged the sample-taking activities. (MPS-82-2)

Comment: Nor does the SEIS examine the quality of environmental stewardship exercised by Dominion in its other corporate activities.

We suggest you review the October 2003 report by Public Citizen, "Dominion Resources, Inc.; A Public Citizen Corporate Profile." Public Citizen reports that "[I]n April 2003, Dominion's

VEPCO agreed to a \$1.2 billion enforcement settlement with the US Department of Justice and the US Environmental Protection Agency for violations of the Clean Air Act." (Emphasis added.)

The report further states that Dominion's VEPCO failed to install pollution control equipment at its coal-fired Mount Storm Power Plant in West Virginia after it made significant modifications that increased power-generating capacity. This was a violation of the Clean Air Act and, "according to the EPA, resulted in the release of 'massive amounts' of sulfur dioxide, nitrogen oxide, and particulate matter."

Dominion's Dominion Energy, owner of the Brayton Point Power Station in Massachusetts, releases 240 pounds of toxic mercury annually from that facility – enough to poison 120 million pounds of fish part of the Dominion network of companies, according to the Providence (RI) Journal of March 11, 2005. Eating mercury in fish and shellfish presents a danger to children and pregnant mothers by harming developing nervous systems. Dominion Energy has been served with a notice of intent to sue by the Conservation Law Foundation, according to the newspaper report. (MPS-82-13)

Comment: The NRC placed the entire Millstone Nuclear Power Station on its "Watch List" and ordered an unprecedented three-reactor two-year shutdown in 1996 because of national media exposure of wilful, systemic disregard for safety standards and licensing requirements; Unit 1 never restarted, Unit 2 restarted in 1996 and Unit 3 restarted in 1999; (MPS-82-18)

Comment: In September 1999, Northeast Utilities, predecessor to Dominion, pleaded guilty to committing environmental felonies including falsifying environmental monitoring records and releasing hydrazine, a carcinogen, illegally into the Long Island Sound. (MPS-82-20)

Response: *The issue of compliance with permits and requirements for other facilities or compliance by companies other than Dominion is not within the scope of the SEIS. The comments provide no new and significant information; therefore, the comments were not evaluated further. There was no revision to the text of the SEIS.*

**Appendix A, Part 2. Public Meeting Responses: Excerpts and
Comment Letters**

A.5 Public Meeting Transcript Excerpts and Comment Letters

Transcript of the Afternoon Public Meeting on January 11, 2005, in Waterford, Connecticut

MS. MERRILL: Yes, I do. (MPS-1-1) I'm looking at I guess the economics of -- not just the economics of a town and what would happen to the taxes if it closed or stays open or whatever, but what about the economics of people with cancer? That's another economics that's factored in.

It caused people to get sick, and it cost the town and the insurance companies to pay for it, not just the tax benefit to having a nuclear power plant versus the cost to shut it down. So there's the human side, plus the financial side. That's what I'm getting at. I think it's terribly important to those of us who have been impacted.

MS. BURTON: Thanks very much, Chip. I'm Nancy Burton. I'm here representing the Connecticut Coalition Against Millstone.

(MPS-2-1) I was interested to hear the comment that this environmental impact statement draft addresses the issue of radiological impacts and cancer in the community. I have reviewed every page of this document, and I have found nothing here that seriously addresses or, in fact, even addresses the link that the scientific community has established between radiological emissions from nuclear power plants such as Millstone and cancer.

In fact, what I have seen in this report is an outright statement that no link has been established between the radiological emissions from Millstone, which we know are among the very highest in the entire country, and the high incidence of cancer which has been identified in this area.

MS. BURTON: Thank you, Chip.

Mr. Emch, I have a question about the procedure here, because a great deal of information was presented during the proceedings that were before the Atomic Safety and Licensing Board that somebody here had reference to. And during those proceedings, the Connecticut Coalition Against Millstone presented a great deal of information.

And you were in attendance at those proceedings as well as, if I'm not mistaken, Victor Nersis, Serces, whatever his name is, and others representing the NRC. For instance, (MPS-2-2) there was a document presented which was the affidavit of Dr. Ernest Sternglass, which went through chronologically, historically, the scientific links between radiological emissions from nuclear power plants such as Millstone, and, in fact, including Millstone particularly, and cancer, including very recent -- a very recent report appearing in The Journal of the American Medical

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Association linking dental X-ray exposure to pregnant women to early childbirth, premature labor, and potentially significant problems later.

(MPS-2-3) In addition to Dr. Sternglass' affidavit, you saw us present documents from Joseph Mangano in which he detailed recent analysis of teeth donated by children. And these teeth, according to the declaration provided by Mr. Mangano, were analyzed for Strontium-90 content. And the information that was submitted showed that the baby teeth collected in the State of Connecticut had, in the areas nearest the nuclear power plant, double the level of Strontium-90 as compared with the average -- so-called -- in the population, measured in picocuries per calcium -- gram calcium.

(MPS-2-4) In addition, you saw that we presented a report, a recent report from the European Commission on Radiation Standards, which in very conscientious terms analyzed the present levels/standards of radiation exposure that are being applied in these present proceedings and found, on the basis of overwhelming scientific evidence, that the standards are probably 100 to 1,000, or possibly more, understated, and that the standards should be very, very significantly heightened in order to protect the population from disease from cancer and even genetic mutation.

(MPS-2-5) We presented to those proceedings an affidavit from Cynthia Besade -- a resident of Waterford for many years, and a person knowledgeable as to aspects concerning former workers at the Millstone power plant, including her father who was one of seven pipefitters who all died of similar diseases, cancers, before their time.

Her affidavit also detailed examples of children dying of leukemia and other diseases in the community, friends, mothers of

MR. STEINBERG: Okay. (MPS-3-1) Before Nancy Burton was making the point that information from scientists in the radiation and public health project -- that was available at a -- a related hearing about this issue -- was not considered in your draft.

MR. BOWMAN: My name is Peter Bowman. I may not have followed correctly, but there seemed to be -- something was put up there about solid waste, and I'm assuming it has to do with the spent fuel. (MPS-4-1) How can a decision be made on impact of spent fuel on the system when we have no real plan in this country for dealing with spent fuel?

The future of Yucca Mountain, which is the designated repository, is in doubt over many, many areas, both technical, legal, and environmental. And the possibilities of moving fuel to Yucca Mountain within the next 20 or 30 years seems very remote.

So how can we talk about the impact of spent fuel on this impact -- on this statement here when we don't have a real answer to it, other than to -- talking about putting it into dry cask storage on site, which, to me, makes the site a long-term repository for spent fuel which, my understanding is, is not allowed under the laws of Connecticut.

MS. BOWMAN: Yes. (MPS-5-1) You referred to the ICRP and other agencies, which primarily refer to externally received rems/doses of radiation. What I want to know is: have you looked and are you considering the latest information, the latest scientific information, both from Great Britain and from the United States, that refer to internal emitters and the effect of internal emitters?

MS. BOWMAN: Yes, I do have questions. (MPS-5-2) You mentioned the Columbia Healthy Worker Effect Report. It sounded a little confusing to me, because originally the Healthy Worker Effect was discovered or outlined by Dr. Mancuso with the help of Dr. Stewart, Alice Stewart, from Great Britain.

And the point of that Healthy Worker Effect was that the people hired to work on a regular basis at nuclear plants at the particular site that they were referring to are people at the prime of their life in a healthy condition.

Therefore, the effects of radiation are not as powerful on them as it is on infants and old people and children in utero, so that they pointed out that that was not a good basis on which to establish safety standards which are the standards which are now being based -- they are based on.

And, therefore, those standards are wrong,

(MPS-5-3) But you are not -- didn't seem to be addressing the constant flow of waste going to Barnwell and their impacting an African-American community of low income and constantly building up and causing a great deal of trouble and health harm there.

So it seems to me that the environmental impact statement doesn't raise that issue, and I wonder why.

(MPS-5-4) The question of alternatives also bothers me. You seemed to set your priorities in the wrong direction. I may be wrong about that, but you mentioned first coal, gas, and all kinds of alternatives, which are not generally considered good alternatives.

You just barely touched on solar and wind, which, along with environmental conservation and energy efficiency, conservation and energy efficiency you didn't mention at all. And I wonder if that's in your -- was in your purview.

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MS. BOWMAN: Yes. (MPS-5-5) I want to ask you whether you include what the administration, the present administration of our country, is constantly beating on, and that is the question of sabotage and terrorism, and now the question of natural disasters by the way they're -- the disaster in the Indian Ocean included a nuclear plant. And have you considered all these aspects in your report?

MS. BESADE: My name is Cynthia Besade, and I'm actually -- nice to meet you. (MPS-6-1) I'm concerned because the entire plant is built on an ancient earthquake fault. The probabilities of movement, seismic movement, are there. How could you possibly calculate that that was of low impact?

(MPS-6-2) You talk about, you know, tsunamis being of a low, you know, statistical value. However, earthquakes are not of low statistical value. That can happen at any time. But, you know, these acts of nature are something that we don't have any control over.

If we were to experience what was just experienced a couple of weeks ago in the Asian countries, how in the world are we going to handle something like that? That is going to -- you know, the earth is going to open up. Those buildings that are moved we're going to have leakage of any containment that's inside of the buildings.

(MPS-6-3) It would be a sequential event. We would have an earthquake, which would be followed by flooding, which would be followed by interruption of the structures. We'd have openings for that radioactive element to be exposed into the environment. How can that be put down as, you know, just a small thing of value, or small impact?

FACILITATOR CAMERON: Okay. Thank you. Thank you, Rich, and thank you for your patience also.

We're going to go to the second part of the meeting and hear from all of you. I just want to reiterate that because we do have a number of speakers, I'm going to ask you to follow a five-minute guideline. And I apologize in advance if I have to ask you to wrap up.

And we're going to try to get to the people who have to catch the ferry first, and others who have commitments.

Five minutes is enough to at least alert us to what your concerns are. We have already heard some of those. The public comment period is your chance to respond in detail and tell us what we should consider in the environmental impact statement.

Before we go to other members of the public, I just want to give the license applicant an opportunity to talk about what their vision, their rationale, is here. And we have Mr. Scase from

the company, from Dominion, who is going to talk to us, and he is the Director of Nuclear Licensing and Safety. Is that right, sir?

MR. SCASE: Yes, that's correct.

FACILITATOR CAMERON: All right. And we have a copy of his presentation for the record.

MR. SCASE: Thank you.

MS. BURTON: (Inaudible comment from an unmiked location.)

FACILITATOR CAMERON: Okay. Let's let him make his comment, because that's usually what we do.

MS. BURTON: (Inaudible comment from an unmiked location.)

FACILITATOR CAMERON: Okay? Because your comments are much more important in a sense. This is part of the backdrop. So we're going to let him do it, so that we can get on with it. Thank you. Go ahead, Steve.

MR. SCASE: Good afternoon. My name is Steve Scase. I am the Director of Nuclear Safety and Licensing at Dominion's Millstone Nuclear Power Station and have been working in the nuclear industry for 34 years.

I'd like to thank the Nuclear Regulatory Commission and the town of Waterford for providing another opportunity for the public to speak on this important issue. As you know, the Millstone power station is seeking to renew the operating licenses for its two operating reactors -- Millstone Unit 2 and Millstone Unit 3 -- for 20 additional years.

As part of this rigorous process, we have conducted a study which took place over a period of almost two years analyzing potential environmental impacts associated with the additional years of operation. At the environmental scoping public meeting last May, I related how Dominion's license renewal team has spent many hours carefully preparing the environmental report.

In fact, we spent thousands of hours collecting and analyzing the data. This data not only included site-specific issues, but also compared national and worldwide industry knowledge and experience.

Following this submission, hundreds of additional hours have been spent supporting the Nuclear Regulatory Commission's detailed review of the report to ensure that Millstone's

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continued operation will provide Connecticut and New England with safe, reliable, and environmentally responsible power well into this century.

The NRC's comprehensive evaluation of the environmental issues associated with license renewal for the site has resulted in the draft environmental impact statement which is the subject of this meeting.

I would like to take this opportunity to thank the NRC review team for their hard work. Dominion recognizes the complexity of the issues that were evaluated and believes that the team did a very good job in the review.

(MPS-7-1) As you know, Millstone is a vital component of New England's energy infrastructure and provides the equivalent of roughly 48 percent of Connecticut's electricity, which is enough to meet the needs of more than one million homes and businesses without generating greenhouse gases that contribute to global warming.

As the electricity demands of New England and Connecticut grow in the coming years, Millstone will clearly play an important role in meeting these needs. The men and women of Millstone strongly believe in enhancing the quality of life in southeastern Connecticut through volunteerism, public service, and our commitment to protecting the environment:

Whether this participation is through our involvement in the United Way, or working in a local park, or building a playground for a school in need, we are involved in our community. We view this participation as part of our responsibility to the communities in which we live and work.

Because we raise our families in these communities, we understand the importance of operating Millstone in a safe and environmentally responsible manner. Ensuring that Millstone's continued operation meets or exceeds the NRC's stringent guidelines for operations is important to us, not only as employees but as citizens and neighbors in our communities as well.

Dominion has long been recognized as a leader in the nuclear industry, and each day we maintain our commitment to operating Millstone safely, reliably, and economically. After carefully weighing all of the factors associated with renewal of the Millstone Unit 2 and Unit 3 operating licenses, we are confident that Millstone will continue to play an important role in providing Connecticut and New England with safe, reliable, and environmentally responsible energy for many years to come.

Thank you.

FACILITATOR CAMERON: Okay. Thank you, Mr. Scase.

We're going to extend a courtesy to those who did travel a long way, and we're going to go to, first of all, Mr. Joshua Horton. And Mr. Horton is the supervisor of the town of Southold in Southold, New York.

And then, the next two speakers, we're going to go to our Michael Domino and Marie Domenici.

Thank you. All right.

MR. HORTON: Thank you, Chip. I certainly appreciate the courtesy of being allowed to go first, if you will, in the comment period.

Just one thing I want to mention -- my name is Josh Horton. I'm the supervisor of the town of Southold, your neighbor across the Long Island Sound, about 10 miles, if you will, to your southeast.

A supervisor, for those of you who don't know, is -- and don't understand the New York State construct of government -- don't try to learn it, but the supervisor essentially is your First Selectman. I'm elected by -- I represent 22,000 people in the town of Southold, the county of Suffolk, in the State of New York.

And just as a point of order and reference to generic environmental impact statements, and how they are run, and the public hearings that are associated with them, with all due respect, Chip, you can take the five-minute rule and put it out in the parking lot.

This is a public hearing, and under at least New York State rule -- law, and I'm sure it's the same as Connecticut State law, you cannot limit the public's time to speak at a public hearing. You can do so at your public meetings while you're addressing resolutions. You cannot legally limit people's time to speak at a public hearing.

So I may need a little more than five minutes. (Applause.)

And I don't come here as an adversary, but I do come here as a staunch representative of the public. Your boss is the NRC. Mr. Millstone, your boss is Dominion. My boss is 22,000 people in the town of Southold. (Applause.)

I do have some prepared remarks, and I heard so much here today that I'm going to try to stick to my prepared remarks, because I think so many of you have so much more technical expertise and knowledge as it relates to Millstone and how it affects your community.

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I want to talk a little bit about how it affects the community of Southold town. Now, understand, we receive no tax benefit. We receive no power in the town of Southold from Millstone. We don't want it. We don't want the tax revenue, and we don't want the power. We don't want it.

We said no to Shoreham, and we won, and that was because we, the citizens, brought the power of the government to bear. Now, I may be the power of a small government, a very small government, in fact; I'm still the power of the government of the oldest town in the State of New York, still 22,000 strong, still in a congressional district in the State of New York and the United States House of Representatives that carries a lot of weight, still with two very powerful United States Senators, and I intend to bring that power of the government to bear on this issue because, quite frankly, ladies and gentlemen, your generic environmental impact statement is flawed, direly flawed, gravely flawed.

To get down to it -- and I think Mitzi hit it on the head -- I -- you know, it's the residents who always say it so clearly. You put more effort into studying the effects of Millstone on winter flounder in this generic environmental impact statement than you did on me. Than you did on me, a living, breathing person, that is able to hop on a ferry and come here in an hour and a half on the ferry. More effort went into the environmental impact, the impacts on winter flounder.

(MPS-8-1) Now, let me tell you something. Winter flounder are running strong in our neck of the woods. They're running strong. You do the math. We've got winter flounder in Poconac Bay. We've got winter flounder off the tip of Montock. It's running strong, and it's running strong because the New York State Department of Environmental Conservation has set regulations and limits in regard to how they're caught, protecting their habitat.

And I'm sure the EPA or their environmental organization over here has done the same -- protected the habitat, protected the limits. Therefore, if they're not flourishing in or about the bottom feeding grounds of Millstone, you're going to have to draw your own conclusions. You've done it here in this environmental impact statement. I'd just like to challenge that.

And I'm going to now move to my prepared remarks. I have several comments and strenuous objections to make to the DEIS today, which will be further supported by more extensive written comments in the near future.

(MPS-8-2) That is necessarily the case, because even though a portion of my town -- Southold town -- is located within the EPZ of Millstone, and the rest of my town is just a short ferry ride away, my office received no official notification of these hearings. That's the first I'm hearing of a scoping session.

Now, I've run GISs, all right? I've done that. I've been the head of it, the lead agency, the whole nine yards, and I can tell you that notification is the fruit, the very essence, of getting the public's input. Because if we don't know about it, we can't input it. All right? I knew nothing of this.

When you have an incident at Millstone, you call Governor Rell, and you call me. Yet I knew nothing -- nothing -- of this hearing today. I knew nothing of the scoping session in May. And you bet your ass, if I had, I'd have been here.

(MPS-8-3) Your EIS, the process, not even the EIS, skip the EIS, the process alone is flawed, and you've got to start over. You've got to start over with all of us involved.

Steve Mizull -- does he still work for you? Does Steve Mizull still work for you? I haven't heard from him since the last time you had a minor incident -- release of radioactive material in March of 2003. I have residents who live within the EPZ of Millstone that I have to evacuate in the event that you have a situation that would warrant that.

So, in fact, the notification I raise as my first objection to the document and the process as a whole. Not one person from the NRC, not one person from Dominion, not one person at any stage of our emergency management chain of command, or our elected Federal delegation, contacted my office about this hearing.

And make no mistake about it, a portion of my township -- Fishers Island and the Federally-held property under the Department of Homeland Security, which was the United States Department of Agriculture, Plum Island, which is also within my township, exists within 10-mile EPZ of Millstone. And, furthermore, the rest of my township lies a breath away from the EPZ boundary.

To think that a simple notification to an affected municipality was overlooked undermines the credibility of this process at the starting gate.

I object that the DEIS or GEIS -- don't you love when us government people start talking in (MPS-8-4) acronyms -- I object that the GEIS contains no evacuation plan for the residents, or no reference to evacuation, for residents of Southold town or elsewhere on eastern Long Island.

The geography of Long Island creates an extremely dangerous situation for those residents. I don't know if you know anything about Long Island, but we can't get off of Long Island on your average work day in an organized fashion. You try and get on the Long Island Expressway and head to Manhattan between the hours of 6:00 and 8:00, and you're going to be sitting in a parking lot.

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Throw a little release of radioactive material in that parking lot, and now it turns to a mess of cars tailgating and creating incredible accidents and anxiety among the people. At the very end of a narrow strip of land there is only one direction to travel in the case of an emergency. I'm just speaking specifically about the town of Southold and the North Fork.

At the end of this very strip of land, one direction to travel in the case of an emergency, and that direction is west. Now I'm curious to know how many other nuclear power plants have municipalities within the 10-mile EPZ that have only one direction they can travel over land?

Name one in the United States of America. Trojan in Portland? I don't know. The one in Delaware? No. Even here in Waterford you can go north, east, or west. God help us. We have two country roads upon which to travel. And though we may be 11 miles, as opposed to 10, away from Millstone, we have two small country roads that cannot handle the traffic of our annual pumpkin season, for God's sakes.

Halloween time rolls around, we can't get out of Southold. People are buying jack-o-lanterns. You expect us to get out of Southold town on a Sunday afternoon after you've blown the stack at Millstone? You've got to be kidding me.

We are in the year 2005. I come from a generation of people that have grown up protecting the environment, and I come from a generation of people that have grown up exploring alternative mechanisms for electricity and for -- to meet our power needs.

You are operating on mid-'50s technology, and it's just not acceptable in this day and age. Shake your head, Mr. Dominion, but that is clearly the case.

There is, in some cases, only one road on which to travel -- New York State Route 25. By the time us North Forkers reach mid or western Long Island, we will be lined up on the Long Island Expressway behind the millions of other Long Island residents who have the same one and only direction in which to travel.

This is a natural recipe for a manmade disaster. That must be avoided.

I understand that the 10-mile EPZ is a product of Federal regulation. The GEIS is an official government process within which you have the opportunity to address this matter. You have the opportunity to address this matter through the Federal Government, through the United States Senate, through the United States House of Representatives, in the context of the EIS, because that's what an EIS is about.

It's about identifying problems and providing alternatives and mitigation measures. So under the guise of this EIS, you have this opportunity.

To the extent that the drafters of the DEIS or GEIS seek to avoid creating an evacuation plan for eastern Long Island, on the purported grounds that Federal regulations only require such plans to do so within a 10-mile radius, they should and must consider the extreme circumstances that are present, and, therefore, extend the Millstone EPZ as it relates to the North Fork of Long Island.

The North Fork of Long Island is directly across the Long Island Sound. I can go to Horton Point in Southold, and on a clear day I can see Millstone. On a foggy day, I can see Millstone from one end.

Strong winds from the north and northeast often blow across the water directly to our shores. We are the first affected residents to the south of this plant. Southold town residents have only two small country roads on which to travel, and only one direction in which to go. As I mentioned before, that direction is west. That takes one further away from Millstone Nuclear Power plant.

To say that we are beyond the affected area is false and cannot be the basis for a proper EIS. With that knowledge, I maintain that it is imperative that the NRC expands the scope of its evacuation planning to a radius that encompasses the entire North Fork of Long Island.

(MPS-8-5) I am requesting that a fully-funded Federal emergency management study of Southold town's unique geographic challenges, and how this relates to the threat of a radioactive release at the Millstone power plant, be undertaken as part of this GEIS, and that the GEIS be considered incomplete without it.

(MPS-8-6) And, furthermore, that no permits for this facility be granted until such data is compiled, disseminated, thoroughly discussed in public, and its findings implemented. If this cannot be accomplished -- and I'm sure this cannot be accomplished by July -- so, gentlemen, you're going to have to hold this open. If this cannot be accomplished, then I call for the closure of the Millstone Nuclear Power plant. (Applause.)

Since this is a matter of Federal concern, and this is the subject of Federal regulation, it is crucial that the NRC seek and heed the input of Federal elected officials in the surrounding areas regarding the concerns of the constituents.

(MPS-8-7) I call upon the NRC -- and this I hope is reflected in your responses -- I call upon the NRC to request input and guidance from United States Senators Schumer, Clinton, Lieberman, and Dodd. And I don't want it from their aides. I think it's got to come from their mouths. I think you have to have a conference, a senatorial conference, and seek their input.

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The same must be sought from Governors Rell and Pataki. In addition, NRC must seek the counsel and input from Representative Tim Bishop of the First Congressional District of New York, and his colleagues in Connecticut. The testimony of these officials must be incorporated into the GEIS and addressed within.

The EIS should not move forward until such input is formally sought and integrated into the document.

Ladies and gentlemen, I have made several points, recommendations, and requests on behalf of the 22,000 year-round residents that I represent. Mind you, in the summertime and on the weekends, our population doubles and, again, triples. On behalf of these people, I demand they all -- all of these remarks be addressed within the context of this formal EIS.

I don't look at this as a stumbling block. I look at this as a turning point -- a turning point for our communities, a turning point for how the United States of America can address its energy needs, and a turning point for the NRC to not be a promoter of nuclear power, but to be a regulator of nuclear power, which I believe is well within the charter of your organization -- an organization, quite frankly, that these all -- these people here fund on a daily basis.

I also want to enter into the record -- and I'm going to read through a few of these -- and I know that you're itching over here, Chip, to get me off the podium.

FACILITATOR CAMERON: No.

MR. HORTON: I've been in your position before. I've run these meetings, and I know exactly how you feel.

FACILITATOR CAMERON: I have to ask you --

MR. HORTON: However --

FACILITATOR CAMERON: -- we're giving you some leeway because of the --

MR. HORTON: Right.

FACILITATOR CAMERON: -- importance of your position, but I want to clarify, the five-minute rule is so that we can hear from everybody else.

MR. HORTON: Then you're going to --

FACILITATOR CAMERON: So can you --

MS. MERRILL: Come on. He's a lot more important than you are. Please let him finish.

FACILITATOR CAMERON: I know. That's true.

MR. HORTON: Well, no, it's -- we're all important here. Thank you. That's flattering.

FACILITATOR CAMERON: Can you wrap up, though, for us?

MR. HORTON: I'm going to wrap it up. But, again, I understand your five-minute rule, but your five-minute rule is applying to the licensing of a nuclear power plant.

MS. MERRILL: That's right.

MR. HORTON: So each one of these people deserves a little more than five minutes. Listen, I've been on the other end. I've run public meetings, I do it every week. And sometimes I'm sitting up there thinking, "Wow, I wish you'd stop talking." (Laughter.)

I know how you feel. All right? I know how you feel.

FACILITATOR CAMERON: Well --

MR. HORTON: I also have -- what I want entered into the official record is a portion of the GAO report that was done on Millstone and Indian Point. And this has to be entered into the EIS, because it's applicable to my request that it be looked into within the context of the EIS.

And this is not in regard to my request for the 10-mile EPZ being expanded. This is within the 10-mile EPZ. This is within the town of Southold that is affected by the Federally regulated or standard of 10-mile emergency protection zone. (MPS-8-8) And in the GAO, which, mind you, is a federally -- is a Federal agency, the GAO reports -- this is a compliance review matrix for Fisher's Island, which is a little teeny island out in Fisher's Island Sound that happens to fall within my jurisdiction.

Here are the requirements: identifies local, Federal, and private sector organizations that are part of the overall responsible organization. This is in response to the possibility of an evacuation for the residents of my community. Requirement met or not met? Not met. These agencies are not clearly identified.

Functions and responsibilities for major elements in emergency response specified for each organization and key individuals by title. Not met. The plan does not cite the legal basis for the key elements in emergency response.

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This goes on and on and on as to the inadequacies that exist within the emergency management plan for a small island of 275 people that I represent. And the GAO says it's inadequate. Your EIS says you don't have to address it. Where do we meet on this? Who has to address it, then? The Federal Government said it's inadequate, and Dominion and the NRC say it's all right, it's an ongoing process.

The process cannot go on until the 275 people I represent are well taken care of, and that 10-mile EPZ be expanded. And I would like to have these entered into the record. You will get further written comments from my office, and also I just want to let you know that if this process does continue on, without having these requests specifically met, the town of Southold will see you in Federal court. (Applause.)

And thank you for the time.

FACILITATOR CAMERON: And can we get -- can you give those to --

MR. HORTON: All right.

FACILITATOR CAMERON: And do you want this? There you go.

Let's go to Michael first, and then we're going to go to Marie, and then we're going to go to Cynthia Willauer.

Michael? Michael Domino.

MR. DOMINO: Michael Domino. I'm a resident of Southold, Long Island, New York. I'm President of the North Fork Environmental Council. Our membership at this time includes approximately 1,500 North Fork residents. We're a diverse group, politically and economically, unified in our desire to advocate for a responsible, sustainable environment in our beloved North Fork.

The NFEC has never taken a formal position against nuclear power, and we're not prepared to do so at this time. Having said that, we have not taken a position in support of this particular power plant, nor do we do so today.

(MPS-9-1) In our view, site analysis should include, but not be limited to, stringent oversight of the physical plant, the management, detailed plans for transportation of fuel, and the final repository of waste materials, and placement of a plant in a remote location so that in the unlikely event of a catastrophe evacuation is feasible. We do not believe that this application meets those criteria.

Radioactive fuels have a half-life, and so do nuclear power plants. Certainly, there are strict maintenance procedures in place. With age, comes the increased probability that something will go amiss. This is not a new facility with an as-yet unproven track record. (MPS-9-2) The NFEC membership is very concerned that our location, some 10 to 11 miles south of this facility, will place in grave danger in the event of an unplanned evacuation.

Any severe accident evaluation, or evacuation plan which does not include the North Fork of Long Island, is deficient.

Residents, civic, and environmental groups have joined many elected officials from the east end and across Long Island, called upon our government to extend the emergency planning requirement from the current 10-mile radius to a 50-mile radius. By doing so, emergency planning for the North Fork would be required.

(MPS-9-3) As stated before, some North Fork residents live as close as 12 miles to the Millstone reactors, yet there are no plans in place to ensure the safety of these residents if there were an incident at the Millstone facility.

Because the North Fork is essentially a peninsula surrounded by water on three sides, we have only one direction to evacuate. That's west. Residents of Orient -- and I have a map, I'm going to submit it probably later on for -- for the record. Residents of Orient have only one road leading west until Greenport. There are only two roads from Greenport to Mattatuck, and three from Mattatuck to River Head.

In the event of an emergency, evacuation of the 22,000 year-round residents and 30,000 summer residents would be virtually impossible, not to mention the hundreds of thousands of Long Island residents who live to the west and who would also be evacuated. Because evacuation of Long Island is impossible, the Shoreham nuclear power plant was shut down. Many of us live closer to Millstone than to Shoreham.

(MPS-9-4) We are concerned also about the regulation and potential deregulation of what are termed "nuclear waste" and about the impact on Long Island Sound and the nation as a whole.

(MPS-9-5) The hearing was poorly noticed. Although the hearing may have met the legal requirements for notification, very few stakeholders in the North Fork were aware of today's hearing, or, for that matter, the entire scoping process -- we certainly were not given ample time to fully read, consider, and prepare thoughtful comment on the generic environmental impact statement for license renewal of nuclear power plants or the 449-page draft supplemental environmental impact statement, which examines the renewal of the Millstone licenses specifically.

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Because the actions of the NRC in this licensing renewal process will affect the residents of the North Fork and Long Island, we request that the NRC hold an additional public hearing on Long Island. (Applause.)

(MPS-9-6) In conclusion, the NFEC wishes to go on record as being in opposition to the license renewal of Millstone Power Station's Units 2 and 3, and more detailed written comments will follow.

Thank you very much for the opportunity to speak. (Applause.)

FACILITATOR CAMERON: Thank you. Thank you, Mr. Domino.

We're going to go next to Marie Domenici. Did I -- am I saying that wrong?

MS. DOMENICI: (Inaudible comment from an unmiked location.)

FACILITATOR CAMERON: Okay.

MS. DOMENICI: Good afternoon, and thank you so much for having me come here and share my thoughts about the licensing of Millstone. I just want to say off the top that I think it's really important that, (MPS-10-1) as a community 10 miles across the pond, we are underrepresented here today because the turnaround time of notification was too short a time for anyone to really rally the troops. And, frankly, I find that a little bit -- a little disingenuous on behalf of the NRC, not to make it a point to speak to your neighbors.

On that note, I would like to read my statement. I don't profess to have any specialized credentials as it relates to this subject matter. I come here today as a citizen who has concerns about what I hear and read as it relates to the Millstone power plant and its impact on our environment.

Therefore, the following are my thoughts, concerns, and reasons for opposing this licensing.

Lack of notification to Long Island residents. (MPS-10-2) Currently, there is no plan -- plans in place to notify Long Island in the event of a nuclear accident. Legislation should mandate a 50-mile radius notification system.

Lack of an evacuation plan. And I'm not saying anything here that you haven't heard already, but you have to understand the importance of this. So there is no evacuation plan that will ever safely evacuate Long Island in the event of a nuclear accident.

(MPS-10-3) Environmental exposure to radiation, EMF, and cancer-causing agents. And we can dispute that from now 'til the cows come home. We do know that radiation is a cancer-causing agent, and we can sit here and deny or we can sit here and face the problem and try to make some kind of an amenable situation for all.

If you are trying -- you know, your presentation here was all very nice and all that, but you know what? As people who are against a nuclear power plant, you needed to hear what we had to say. We didn't have to sit here and sit through all of the processes that you go through as an organization. Perhaps in the future when you do have meetings like this, listen to what we have to say first. And if anyone is interested in what you have to say afterward, let your presentation be at the end of your meetings.

(MPS-10-4) The nuclear power plants are targets for terrorism, and we haven't even touched on that. Okay? The terrorists certainly know where all of our weak spots are. And a nuclear power plant just screams. You just may as well leave the keys in the car with the lights on and just let it happen, because that is what -- you can talk about all of the reinforcing, and you can talk about all that good stuff, but the reality is it doesn't work. And for anyone to try to make us think it will is also very disingenuous.

In reading the abstract on your website, I have grave concerns relating to the environmental issues identified by the staff. (MPS-10-5) And let me just say it only takes one catastrophic event, whether by nuclear accident or terrorist attack, to devastate this region. So to have 92 environmental issues, whether small or great, are 92 too many.

(MPS-10-6) Not only do we have to be concerned about a nuclear accident or attack, but we also have no place to put the spent fuel, and this poses an entirely whole set of other problems. Long Island has been targeted by the EPA to use the Long Island Sound as a dump site for Connecticut's dredge waste. The Sound is an estuary, and the EPA is the guardian of the estuary, and I find it unthinkable that the EPA feels that there will be very little impact in dumping over 200 million cubic yards of waste from Connecticut.

And although it may not be radiation waste, it was, because they cleaned up the submarine base in Groton, or wherever. So what makes anyone think it's okay to dump in the Sound, or any other waterway?

The mere fact that Millstone does not have to notify Long Island -- its Long Island neighbors in the event of an accident prompts me to ask, who is minding the store? It is not -- is it not the role of the NRC to ensure the health and well-being of all people, or does the NRC have concern for only a chosen few? Environmental decisions such as this cannot always be made with political agendas, shareholders, or big business in mind. It can't always be about profit.

Appendix A

As a resident of Long Island, I resent the fact -- I resent the lack of concern by the NRC toward its Long Island neighbors. And as a citizen of this planet, I have grave concerns the NRC's vision does not have the very best interest for all people. Can anyone here from the NRC tell me, where do I take my family after a nuclear accident? What place would be safe? Do you have a place that you're going to go to in the event of an accident? Because we all need to be there. Okay? It's that simple, guys.

To quote from your website, "The NRC's primary mission is to protect the public health and safety and the environment from the effects of radiation from nuclear reactors, materials, and waste facilities." Please reread your mission statement from time to time, and remember why you are in business in the first place, and who you are supposed to be protecting.

Knowing the right thing to do in this case should not mean having to legislate or mandate laws. Doing the right thing should not hinge on risk assessments as the risks are too high. I think we all know what the right thing to do is in this case. (MPS-10-7) I go on record as opposing the issuance of this license.

Thank you. (Applause.)

FACILITATOR CAMERON: Thanks, Marie.

We're going to go to Cynthia Willauer, Tony Sheridan, and then Gail Merrill. Cynthia? Cynthia, I believe, has some individual remarks, and something from another organization. Is that correct?

MS. WILLAUER: Is this on? Or is this on? Or which is on?

FACILITATOR CAMERON: Yes, they're both on.

MS. WILLAUER: I'm skipping the individual ones and just speaking for two organizations.

FACILITATOR CAMERON: Okay. Thank you very much.

MS. WILLAUER: I live in Lyme, Connecticut, which I think makes me within the 10-mile radius that people have been talking about. And I'm representing two groups -- PACE, People's Action for Clean Energy, and Energy Option Study Group of Lyme. And I will begin with reading the PACE report. I serve as a radiation monitor for this group.

(MPS-11-1) PACE -- People's Action for Clean Energy -- a Connecticut State organization since 1974, representing 2,400 constituent households, strongly and adamantly opposes the

relicensing of Millstone. Our Board of Directors, members, and supporters are extremely concerned about terrorism. We've heard this before.

The spent fuel pools at nuclear plants are not adequately protected. In fact, we view nuclear power plants as weapons of mass destruction only waiting for terrorists to detonate them.

To further understand the reality of this scenario, PACE invites the NRC representatives here to join us on February 8th in West Hartford at St. Joseph's College to view the FX cable channel feature film entitled *Meltdown*. This realistic portrayal of the infiltration of terrorists into a nuclear plant is chilling and relevant.

(MPS-11-2) In addition, we are deeply concerned about the continuous release of radioactive isotopes that are emitted from these plants. These emissions have fallen on Connecticut's soil and water and have been emitted into the air for years.

The effects of radiation are cumulative. Since few studies have been done on the cancer rates around the plants, we only need to use our reasoning powers to understand that the radiation is harmful and that the degree of harm varies from individual to individual.

We do know that children and fetuses are extremely vulnerable to these long-lived and terrible poisons. (MPS-11-3) We are also worried about a nuclear accident. Old machines are fallible, as are the human beings who run them. We only need to look at the Davis-Besse in Ohio to understand the potential of what may occur without even the awareness of nuclear plant operators.

(MPS-11-4) In addition, we find the centralization that this kind of energy represents to be unwise. Our centralized grid is brittle, vulnerable to blackouts and terrorism. Decentralized energy substations, using renewable energy, would help to make us safer.

(MPS-11-5) Lastly, continuous operation of nuclear power plants creates more waste. Even if we send waste to Yucca Mountain, a seismic area, more waste will be created in Connecticut that will remain to hurt us or to tempt terrorists.

(MPS-11-6) We urge you not to relicense Millstone. Relicensing is a recipe for disaster. And this is submitted by Judi Friedman, who is the Chair of PACE.

So now for the Energy Option Study Report. This is a group that was founded in February 1997, when news of Millstone's dysfunction was widely reported in the press. I was a co-founder of the group, because I was aware that I had been blind to the danger that Millstone presented. I was raising my children and training for work, and I was -- I was really blind to the dangers of nuclear power.

Appendix A

I had -- a friend remembers my saying I had my head in the sand. And we got together as a group, and we researched the hazards of nuclear generation of energy and the radiation emission of the plants, and we learned of the dangers of waste.

But more important, our focus was educating ourselves about alternatives to ongoing reliance on nuclear power and on dwindling fossil fuels. We learned about alternative sources of energy and the strides that are being made and that can be made in efficient use of energy.

(MPS-11-7) Our reading told us -- tells us -- and this I know is not -- not universally believed, but we believed it, and we studied this in depth. In combination with energy efficiency, methods of generating energy efficiently, and shifting to renewable sources, this can be done. It's not a myth. And other countries are already doing it.

So to relicense nuclear plants for another 20 years is to pull the rug out of initiatives to develop cost-effective renewable generation of energy, combined with change of policy for wise use. To pull the rug out -- this is to move the energy policy of the nation in the wrong direction. So we urge you: don't do this.

There are many points that we might make to convince you of our position, many of which have been made earlier. But I am limiting myself to sharing one, and it's -- this also has already been shared. (MPS-11-8) We don't know what to do with nuclear waste. I think it's unethical to generate hazardous waste in our community and transport it out for disposal.

It's unethical whether the community that is receiving the waste wants it or not, because the community that wants it is bound to be poor. They're in it for the money. They need the money. But what they get is contaminated groundwater and contaminated -- all that that means, all that the contamination of their community means.

And as for Nevada -- the State of Nevada having to receive it, put our foot in that shoe. We wouldn't accept the nuclear waste of another State or, worse, of the nation.

(MPS-11-9) Now, a time is opening up for us to change our ways. If we calculate the full cost of the ways we generate energy -- and I didn't hear the whole of the presentation, but I think the hidden costs were not mentioned, the health costs for instance, we learn that we can't afford to -- not to change our ways.

(MPS-11-10) Nuclear energy is expensive when the hidden costs are factored in. Expanding the use of renewable energy, combined with the creative design of wise years, is really the only way to go in the long run. But it takes study to know that this is so.

So let's take our heads out of the sand collectively and see the danger of relicensing, and the opportunity in not relicensing. It's exciting, it's interesting, and it's being done elsewhere. Let's bring the opportunity home. Thank you. (Applause.)

FACILITATOR CAMERON: Thank you. Thank you very much. I'll give one to the transcriber, and we'll keep one. Thank you.

We're going to go to Tony Sheridan, and then we're going to go to Gail Merrill.

MR. SHERIDAN: Cynthia Willauer is a tough opponent to follow. Much of what she said I can have a good discussion with her over, and do indeed from time to time, and don't necessarily disagree with all she said -- of what she said.

But the fact is we are here. (MPS-12-1) We do need electricity. Millstone produces close to the equivalent of 50 percent -- think about that -- 50 percent of the electricity Connecticut uses on a daily basis.

You know, I'd like to think of

MS. BURTON: (Inaudible comment from an unmiked location.)

MR. SHERIDAN: No, I do not work for Dominion.

FACILITATOR CAMERON: Okay. Great. Go ahead, Tony.

MR. SHERIDAN: And thank you for reminding me. I'm President of the Chamber of Commerce of Eastern Connecticut, and I represent approximately 1,250 employers who employ a little over 50,000 people in eastern Connecticut.

MS. BURTON: (Inaudible comment from an unmiked location.)

MR. SHERIDAN: I didn't interrupt you, so I --

FACILITATOR CAMERON: Nancy, if someone wants to come up and make --

MR. SHERIDAN: -- would appreciate it if you didn't interrupt me.

FACILITATOR CAMERON: -- a comment, they can make a comment. So let's let Tony continue, and then we'll get to the rest of everybody, including you.

Appendix A

MR. SHERIDAN: I happen to be involved with this issue for a long time. I was First -- or Selectman in this town for 10 years, and First Selectman for 8 years. And there were good times and bad times.

(MPS-12-2) I was Selectman when Millstone had a lot of difficulty and when, quite frankly, the process was not like the process that I see here today. The process was quite unfair, quite awkward, and certainly wasn't as fair or as balanced as it seems to be today. So I appreciate the learning that both the NRC has done, and certainly it seems to be a lot more fair than the days of -- my Selectman days where we'd sit here night after night listening to NRC speak the speak and really not address the issue.

Today there is a valid attempt -- and I have seen that now for several meetings -- a valid attempt to take into consideration public comments. What I did when I was First Selectman -- and this is a little bit of criticism -- I allowed the people of eastern Connecticut to come and speak first. They're the people who live here, work here, who pay the price one way or the other of having nuclear power plants in their community.

With all due respect to our neighbors in Long Island, we would ask them to wait their turn. But that's another point.

I would like to speak to the importance of having these plants renewed, but I'd also like to pick up on a comment that Cynthia Willauer made. This can't be the end of our energy invention, if you want. We have got to continue to look at better and safer ways to produce electricity, and we will.

This country -- this is what makes this country great. We're always willing to push the envelope and learn more. What we know today about electricity and about nuclear power we didn't know 10 years ago, and hopefully there will be other forms of energy 10 years from now that we may not need to have this debate. But it's critically important in the meantime to have a steady, reliable supply of electricity or we'll quickly become a Third World State.

And I'm serious about that. We need energy. Energy is the mother's milk of economic development. People need jobs. What are you going to do? If you close down Millstone, you're going to import that amount of electricity? Fossil fuel generated electricity? Let's talk about the environment.

I remember a few years ago, not 20 years ago, when I could go out to my car and write my initials on the hood of the car because of the coal and the fuels that were burning up here in Montville. And I lived three miles away from the plant. So I think what we have is a bit improvement. Hopefully, there will be more improvements going forward.

Now, let me just -- there's been a lot of talk here about cancer today. Those are scare words, and I'm sorry your friends I think from Long Island have left. Have they left?

PARTICIPANT: We're still here.

MR. SHERIDAN: Oh, thank you. When I first Selectman, there was a concern that the ball fields, which are loaned to the town of Waterford by Millstone, were contaminated. That was the most recent scare that was out in the community.

Well, here I am First Selectman. What am I supposed to do? I called in -- and Ed Wilds is here from the Connecticut Department of Radiation. Is that right, Ed? And I called at that time Northeast Utilities, and I said, "We've got to look at this. We can't just accept 'no, they're not' for an answer."

We had every square foot -- foot of those fields measured. We found a big boulder that had radon. We did not find waste from Millstone. You could throw a stone from those fields and hit the tower -- the stack at Millstone. So please don't come to our community and try to use scare tactics. Bring your facts. You're most welcome. We want to hear them.

The opposition, the group who have expressed concern about Millstone over the years, have done a great service. They have made all of us more alert, more sensitive. But don't use scare tactics. Bring your facts and get them on the record, because we live here, and we're not fools. (MPS-12-3) We really believe the plants are safe. I believe they're safe, and I can see the tower from my house. And I brought up my family, and about 1,200 people who work at Millstone, who live in the community, they're not fools either.

So thank you very much for your time, and for the good job you're doing.

FACILITATOR CAMERON: Thank you. Thank you, Tony. I'm glad to hear that.

We're going to go to Gail Merrill at this point, and then we'll proceed with some additional speakers.

MS. MERRILL: I am so thrilled to be speaking after the last gentleman, because I'll straighten you out. Okay? I think you need it.

First of all, I don't even know where to start I'm so angry right now. My heart is just pounding, and it's not because I'm uncomfortable speaking. I've been sitting there for hours today waiting to be heard, and I think you should have heard from the public, because I don't want to hear the PR from the NRC or from Dominion. I don't want to waste my time. I had a two-hour drive here to get here.

Appendix A

And my mother is dead of breast cancer. She is 12 miles down from Millstone Nuclear Reactor on Long Island. Then, I got the tumor 11 months after she died. My tumor is not genetic. Now, I'm 77 miles downwind in New Caanan, Connecticut. I'm also impacted by Indian Point nuclear reactor. (MPS-1-2) But radiation.org did their research, and they proved statistically -- and published it in a book -- years ago that women who live within 100 miles of a nuclear reactor have the greatest risk of dying of breast cancer.

Now, anyone who doubts this information, you can see it visually. And this is the NRC's own map. So how do they refute their own map? And how do they refute the government that they work for? Here you go, folks. Here is the breast cancer mortality for women, 50 to 74 years old dying of breast cancer. It's not about any one town. It's all of us. It's the whole northeast. And the gentleman that just spoke doesn't have boobs. He doesn't store toxins in his breasts. Okay?

I'm tired of seeing women die, and I don't want to be one of those women that dies. There is 14-year old girls with breast cancer in Connecticut, more than one, and more than one 15-year old. And I'm not up here to scare you. I'm up here to tell you: this is reality. I've buried five women in their forties in all different towns in my area. In their forties.

I've watched 30-year old women getting double mastectomies and getting the cancer right back again. I don't think he'd like to go through that. And all of the hours it took to prepare these reports. How many hours do you think we spent in the chemo room?

So I don't care about pretty presentations. And I don't care about lip service. I don't want to die, and that's the reason why I'm here.

(MPS-1-3) The Tumor Registry says that you all have the highest cancer rate in -- is in New London County. And within that, the top -- the six towns around it, around Millstone, have the highest of 12 different cancers. That's the Tumor Registry, folks. They don't lie.

My tumor is in that registry, and too many others are in that registry, too. Okay?

Now, just so you don't miss it, this is the young women dying of breast cancer. Okay? It's not just about one town. And what makes me really mad from my perspective, who doesn't want to die, is how dare a town ignore the facts, lie to the public, and put their profits before public safety. How dare you.

You might want your schools. That's nice. But I understand one of your high school students had uterine cancer last year. There's a kid in Mystic -- a two-year old dead of bone cancer.

Now come on, folks. You've got kids. You've got grandchildren. This is not okay. Have you noticed that younger and younger people are getting cancers?

Look at the cemetery. A lot of older people lived to a lot later age in life. Look at the new graves. They're dying younger.

(MPS-1-4) This is the NRC map. Okay? I'll make it easy for you. There is a correlation. These are government maps that show that 20- to 49-year olds are dying in the northeast, and the 40- to 74-year olds that die in the northeast, and the Tumor Registry confirms it.

Now, for the people that feel like they got here late in the game, didn't know about this meeting ahead of time, the Attorney General feels that way, too. I had a little conversation with him last night. He doesn't like -- don't want to put words in his mouth. I'll stop right there. He's going to be involved in this process, because they weren't aware of this meeting either.

Now, for all you who doubt what I'm saying to you, here's a whole tape full of physicists discussing the corporate link, the cover-ups. I'm in here, the only person who isn't a scientist here. Okay? This won Best Documentary in an L.A. Film Festival. It's been shown in New York City up the wazoo, sold out crowds every time. GaryKnoll.com. Get it. Show it.

Now, I'm going to read to you what I have. I'm so angry. The Nuclear Regulatory Commission -- this is my environmental impact statement regarding the question of the license renewal of Millstone Nuclear Power plants. My statement is in support of the Connecticut Coalition Against Millstone.

I've been impacted by breast cancer at age 48 -- 20 years earlier than my mother got it -- because I grew up with the nuclear chemical industries. She didn't, and my grandmother didn't, and she lived to be 86, never had breast cancer. Okay?

Yale said my tumor was less than 6 percent likely that it was genetic before they ever tested me. Okay? So don't think if it doesn't run in your family it's not your problem. Okay?

I've told you she lived 12 miles downwind from Millstone on Long Island, New York. She's also downwind of Indian Point Nuclear Reactor and the Northern Nuclear Reactor in New Jersey.

(MPS-1-5) That's why they have a nine-year old child down there in Long Island with breast cancer, and the government did a \$6 million study to find the cause of breast cancer. They couldn't find it because they just happened to leave out the nuclear emissions as part of the study. That was exposed in the New York Times article by Dr. Janet Sherman, who works for Radiation.org. It was published.

Appendix A

I've been appalled by the horrific number of young women with breast cancer in Connecticut. In daily conversations from friends, family, hospice workers who take care of dying people, doctors, nurses, it's prolific, and the women are scared. As my neighbor said to me, who is next? She knows of four people in New Caanan where I live with all different kinds of cancers.

We don't have any toxic sites in New Canaan, folks. We have a four-year old with a brain tumor. Now we're downwind about 25 miles of Indian point, but we're also downwind of Millstone. It's too many different towns. It's too many young people. It's getting worse. Okay?

According to our government's National Cancer Institute's Atlas of Cancer Mortality -- that's the map that you just me -- or, sorry, that I just showed you. Okay? The government's own map -- I'm not making it up, folks. It's coming from too many sources. It's not scare tactics. It's reality. And I don't want this town to profit off of the nuclear reactor tax dollars at the expense of my health. That's where my anger comes from.

I don't want somebody to put their profits before my safety. And it's not just about me, Gail Merrill. It's all of us. Okay?

(MPS-1-6) Scientists at radiation.org have published a book "The Enemy Within: The High Cost of Living Near Nuclear Reactors." They proved it statistically. They are also documented in the nationwide tooth fairy project, which is documenting Strontium-90 in your baby teeth. Okay? It acts like calcium, radioactive cancer-causing chemical only from the nuclear reactors now, folks, because the nuclear bomb testing stopped quite a while ago.

The Strontium-90 acts like calcium, goes into your bones and teeth, where it nails your immune system, your thyroid function, so you're vulnerable to cancer, bacteria, and viruses.

Now, just to let you know -- a little alert here -- the first lawsuit has already happened. It's directed against the St. Lucie Nuclear Reactor in Port St. Lucie, Florida, because at least five children, last I heard, were suing because they could prove the Strontium-90 in their baby teeth. They did a big tooth fairy project in Florida. The kids with cancer had twice the Strontium-90 levels in their baby teeth as the kids who didn't have cancer.

And according to radiation public health, 35 baby teeth so far in Connecticut, the kids living closest to the nuclear reactors around Indian Point and Millstone Nuclear Reactor have the highest Strontium-90 levels. Okay?

So a lawsuit could very easily be in the works here. Get together, community. Get those baby teeth submitted. You can document illegal emissions, and our Attorney General said that's what he's going to do. If he can prove illegal emissions, he'll sue. I said, "We've got it." Okay?

Let's see. I'm almost finished here.

Okay. You know that New London County has the highest cancer rate. We've been through that.

Okay. Now, Dr. Ernest Sternglass, Professor Emeritus of Radiological Physics at the University of Pittsburgh School of Medicine, documented in a seven-page report dated August 8, 2004, his opposition to the renewal of Millstone 2 and 3 licenses. A 40-year history of documenting the effects of low-level environmental radiation on human health and development produced by nuclear releases.

He has testified as an expert. His report is submitted in to the NRC. That man, at 80 years old, sharp as a tack, travels internationally still, helped to stop the above-ground nuclear bomb testing by documenting Strontium-90 in baby teeth as the nuclear bomb blast blew across the country and they found it in St. Louis baby teeth.

He says the reason why Nevada on this map is in red is because they did underground nuclear bomb testing until '93. There is lots of evidence, folks, and I will fax it to whoever wants it. I will walk you through it. You can find your own mortality maps.

Too many of us have cancers in too many different towns. Too many of us are downwind of the cancer-causing emissions. You need to close Indian -- sorry. I'll say the same thing for Indian Point. What the hell?

It's the same game, folks. We're dying. Protect us. Come on. Somebody in here has to have enough heart to listen to what I'm saying to you. Or God help you, it'll be your mother or your daughter, somebody in your life will be impacted. And, men, you're damn lucky, because a lot of your cancers -- not all -- a lot of your cancers don't happen -- and your prostate might happen around 48. This is girls getting it. Childhood leukemias.

I'm not the expert here on the science, but I know enough to read the reports. And that's why Dr. Sternglass' material and Joe Mangano's material is going to be submitted to the NRC. And the Attorney General has received the books, because I hand-delivered it to him. And Senator Clinton, and Senator Kerry, they all know it. We have a right to be safe. We don't want to die. So please, somebody, get off your chair and help us. (Applause.)

FACILITATOR CAMERON: Okay. Thank you. Do you want to put that on the transcript?

MS. MERRILL: Yes, I do.

Appendix A

FACILITATOR CAMERON: Good.

Next three --

MS. MERRILL: If anybody would like a copy of my material, I'll be happy to give it to you. Do you want to see the map?

FACILITATOR CAMERON: The next three speakers -- we're going to go to John Markowicz, Nancy Burton, and then Cynthia Besate.

John Markowicz? Hi, John.

MR. MARKOWICZ: Yes. For the record, I'm John Markowicz. I'm the Executive Director of the Southeast Connecticut Enterprise Region. We represent the 22 municipalities in southeastern Connecticut.

PARTICIPANT: We can't hear you.

MR. MARKOWICZ: My name is John Markowicz.

PARTICIPANT: Your mike is not working.

MR. MARKOWICZ: Yes. My name is John Markowicz. I'm the Executive Director of the Southeast Connecticut Enterprise Region. My corporation represents the 22 municipalities in southeastern Connecticut and associated businesses.

I want to thank the Nuclear Regulatory Commission for coming and taking the time to listen to us this evening -- this afternoon. It's almost evening. And I want to also thank you for your patience.

I have reviewed the GEIS, Supplement 22. I did not read all the appendices. I found some interesting facts about anchovies and winter flounder and a few things I didn't know much about. (MPS-13-1) I'd like to note that in my opinion the NRC has been very thorough and very detailed and very complete in the material that has been presented to them to date, and the information and the conclusions that are in this report.

I would particularly like to note that my comments at an earlier meeting regarding the socioeconomic impact of Millstone and the relicensing of Millstone have been accurately

represented. And I would also note that, in my opinion, the comments of other participants at those earlier meetings have been accurately represented, and, in the appendix that I did read, have been addressed.

(MPS-13-2) Upon review of this report, I submit the following comments for the record. I support the staff conclusions and recommendations that are contained in Section 9.3. I also reiterate our support for the relicensing of Millstone 2 and Millstone 3, as is documented on page A-14 of this report.

(MPS-13-3) Finally, I would ask that the comments that were made at the beginning of the meeting regarding the exemption of the emergency preparedness and the security issues associated with the plant that are not included in this be addressed as to the reason why, in the abstract, many of the members of my organization, and another organization that will speak this evening, continue to have concerns.

And the comments that were made at the beginning of the meeting as to why emergency preparedness and security issues are not in here should be included, so that that provides some information to address that issue.

Thank you very much.
FACILITATOR CAMERON: Thank you, John.

Nancy, are you ready?

MS. BURTON: Yes.

FACILITATOR CAMERON: We're going to go to Nancy Burton, and then we're going to go to Cynthia Besade. And we have a few more speakers after that. Nancy?

MS. BURTON: Thank you very much. That will be the end of the pleasantries.

I'm Nancy Burton, and I'm here today speaking on behalf of the Connecticut Coalition Against Millstone. I'd like to -- can everybody hear me? No? No? Thank you.

Razom Nas Bagato. Nas Ne Podolaty! That's a slogan I picked up a couple of weeks ago when I was in the Ukraine serving as an international election observer during the recent contested elections. And that slogan, I learned, translates to, "We are many. We will not be pushed aside."

Appendix A

And that slogan, of course, comes to mind as I appear here today to speak to you concerning the nuclear power plant. But before I do that, I wanted to display something very pretty that I picked up in the Ukraine. (Laughter.)

I have never done a fashion show before, but this is a beautiful --

FACILITATOR CAMERON: Do you think that we should --

MS. BURTON: -- blouse, handmade by women in one of the regions of the western part of the country. And I mention it because the work of the international election observers was made a little easier by the fact of the Chernobyl nuclear disaster in 1986, because it eliminated 73 villages from the political life of the country.

In other words, there were 73 fewer towns for people to vote in, because there were no more towns, no more people, and there never will be again for very many hundreds of years. And so, therefore, there are no cultures or customs or people or children or lives or memories there in that 8 percent area of the Ukraine.

We do not want Chernobyl to happen here. We do not want a situation where, as in Belarus, the country to the north that suffered even worse than Ukraine, where close to 50 percent of the gross national product today in the year 2005 is devoted to Chernobyl mediation mitigation, helping people who are diseased and unable to function in life.

I felt so bad for the hundreds of thousands of protesters who day after day after day in the rain and cold and snow on Independence Square in Kiev were warmed by fires made of wood that was brought in daily. What made me worry was when I read that 40 percent of the forests in the country are contaminated with radiation, and the radiation is released when the wood is burned.

We do not want that to happen here, and that is why we want the NRC to order the closure of the Millstone Nuclear Power Station. I've had occasion to read this entire draft environmental impact statement, and I'm going to throw it on the floor. Maybe I should put it in the fire -- I don't know -- because it is a pack of lies.

We know who paid for it. The nuclear industry paid for it. And I am saying that for 35 years in this community we have listened to lies, deception, chicanery, cheating, harming, and worse.

And as the people on the streets of Kiev have said, "They are many, and they will not be pushed aside." The same will hold for us. We have had enough.

Our government is not working for us. It is not helping us. Our government in this State is so deeply compromised at every level that we have an operating nuclear power plant that is causing people to get sick and die in our community. Go to Seabreeze Drive in Waterford and knock on every other door, and you will find a cancer case where people have died.

There are very many people who will not be in attendance at this meeting, because their heads are in their pillows and they are weeping because they have lost family members. We have had enough of this, and enough of the lies, and we will be heard this time. We have been nice so far, and times have changed.

(MPS-2-6) There is a summary of draft report findings in the back of this room. I wrote down five. Impact to human health -- impacts to human health are of small significance. Impact to air quality are of small significance. Impact of radioactive and non-radioactive waste management are of small significance. Impact of postulated accidents are of small significance.

Current measures to mitigate the environmental impacts of plant operations are adequate, and no additional mitigation measures are warranted. These are lies. These are willful, deceptive lies.

In the Ukraine, there were six people who were operating the Chernobyl nuclear power plant when the disaster occurred. They meant no harm to anyone. They were going through what they thought was well within the realm of what they should be doing to perform certain operations, and things didn't go well. The roof blew off, fires -- horrible fires started, and six people were prosecuted -- those were the operators of that plant -- and spent time in prison.

Well, in our society, we have doctrines that concern criminal conduct, and it has to do with knowledge and intent, and deliberate conduct. We have presented earlier in these proceedings, in court proceedings, in the Atomic Safety and Licensing Board proceedings in this case, in public meetings, we have documented that this facility is a killer of people. It's a killer of fish.

It's the worst predator against the environment in this part of the country, and the NRC has not listened. Dominion has not listened. Or if they have listened -- because how could they not hear -- they are acting deliberately to kill. And under our criminal code, that is an offense. And it's an offense that subjects an offender to time in prison.

I mention that because things are changing in the world and in this community, and we will not accept this treatment further.

Appendix A

I have very many particular comments to address. I see that it's 4:32, so I am just going to focus on a couple. One is the -- of course, I have to start with the health. (MPS-2-7) There's been a complete disregard of all of the information that has been submitted about health effects.

When the NRC can say, "Impact to human health -- impacts to human health are of small significance," do they mean small people, just to children, so it doesn't matter? Or what do they mean by that? They don't mean diddly, because they're just a rubber stamp for a company that paid for them to do this disgraceful job.

(MPS-2-8) When they say that it's of moderate significance that the fish population -- and the fish are important because we eat fish. If we don't have anything to eat, we die. There is a food chain, and when the fish die because they are eating worms that are radioactive from Jordan Cove -- and I didn't see the Cobalt-60 mentioned -- of Jordan Cove in this report -- then the fish get sick, and the birds that eat the fish get sick, and the people who eat the fish and other things get sick. We all get sick, and it's unnecessary.

I mentioned the problems that we have in government that are not -- that are standing in the way of correcting what we have here with the Millstone menace, and it extends to each of the branches. It extends to legislative committees where Melodie Peters -- she is seated here -- maintained a position as Chairman of the Energy and Technology Committee while she went officially on the payroll of Dominion.

The Ethics Committee of this State ruled that that was permissible, and so she carried on in that way. There was a Judge of the Superior Court, Judge Langaumbach, who actually met *ex parte* with lawyers for Dominion and Northeast Utilities and then canceled a hearing that had been scheduled to consider whether there should be a transfer of expired and illegal permits to Dominion.

(MPS-2-9) Those are the same expired and illegal permits that the NRC today is saying are perfectly valid and permit Millstone to kill fish, discharge waste -- radioactive waste and caustic chemicals in the Sound. A Judge of the Superior Court actually did that.

We know that Dr. Wilds of the DEP went on a junket trip at the expense of Dominion to a nuclear waste site, and yet did not report that to the Siting Council recently when he was --

FACILITATOR CAMERON: Nancy? Nancy?

MS. BURTON: Pardon me?

FACILITATOR CAMERON: I'm not trying to say anything about what you're saying, but can we not make comments about other people in the audience like that, if you could. Okay?

MS. BURTON: Dr. Wilds is here.

FACILITATOR CAMERON: That's right.

MS. BURTON: He is able to come forward and speak to this. I'm speaking the truth. These are public records. His name appears in this document as somebody who has spoken with the NRC and told them that the Department of Environmental Protection of this State favors this application and does not find that there is a problem with this plant causing cancer and other adverse health effects in the community. That is a lie.

And that is his name, and he is here, and he is now calling someone on his cell phone. And we are holding him accountable today and tomorrow and forever on forward because we have had enough of the lying. (Applause.)

FACILITATOR CAMERON: And other comments on the draft environmental impact statement?

MS. BURTON: I have many comments, and I will be presenting more in writing. But one in particular I'll point out, and then I will yield the floor to someone else. And that appears at page F-1 in a footnote, which is that the generic environmental impact statement -- and that's the document that in -- what is it -- 92 percent of the time the NRC said, "Because of what's in that document, we don't have to look at what is happening at Millstone, or has happened for 35 years or will ever happen, because of that document."

But if you go to the footnote, you will see that that document was issued in 1996, with an addendum that came out a couple of years later. Well, in 1996, that was before 9/11. That was before many of the proceedings at which the truth of fraud and collusion and corruption came out in proceedings in the courts in this State.

That was before there were disclosures by whistleblowers such as Jim Plumb about historic, willful, environmental violations at Millstone that led Northeast Utilities to plead guilty to environmental felonies in 1998.

This was before many of the people on the -- on a list that you are about to hear about came down with horrible cases of cancer and died. This was before Dr. Sternglass and Joseph Mangano and Dr. Sherman and many, many, many, many others have put their intelligence and their conscientious effort into understanding what has happened here, and found themselves drawn to the conclusion that this Millstone Nuclear Power plant is a menace.

Appendix A

We should not be bound by a document issued in 1996 -- that's the Dark Ages -- when prior to so much which has happened. (MPS-2-10) I would join with the gentleman from Southold in asking the NRC to disband these proceedings. They are flawed procedurally. If the population of Suffolk County -- and there are hundreds of thousands, and they were treated so rudely before, if not of course illegally by the Atomic Safety and Licensing Board, which refused to consider their application to intervene after the legislature voted unanimously to hire legal counsel to intervene.

They're right. They have a right to be here and to be heard and to participate. Just because Dominion sent checks without an explanation to legislators in Suffolk County isn't cause for this NRC not to notify the people of that community and give them an opportunity to be heard.

Thank you.

FACILITATOR CAMERON: All right. Thank you.

Cynthia, are you ready to give us some comments?

MS. BESADE: Yes. Just let me get my paperwork please.

FACILITATOR CAMERON: Okay. And we are running over, but that's fine. We want to hear from the rest of the people who have signed up to talk to us this afternoon. After Cynthia we're going to go to Melodie Peters, then Michael Steinberg, Mitzi Bowman, Peter Bowman, and Walter Parahaus. Is that the correct -- Parahaus? All right.

MS. BESADE: Good afternoon. My name is Cynthia Besade. I'm not a member of any group, coalition. I'm just myself. I'm just an individual -- an individual who lost their father a little over a year ago who was the most -- excuse me -- it's a little bit difficult to talk about this because of his loss.

(MPS-6-4) My father was a pipefitter at Northeast Utilities for over 20 years. He saw many violations of safety, and he became a whistleblower because he couldn't tolerate the way things were done at the plant any longer. He was fired for reporting those safety concerns.

I'm here today to talk for him, and for the 60-some people that are on this list, who have either lost their lives to cancer or are still dealing with the illness. I would say that it's -- approximately two-thirds of the people on this list are now dead.

You can go to the cemetery and see their stone, but you cannot see their face, and you cannot feel their hands, and you cannot feel their love and devotion to a community and to an area that was so pristine when we came here -- I, as a child, three and a half years old, where he brought

us to 5th Avenue in Waterford as it was a beautiful community and a pristine area on the water, so that his family and his children could enjoy the types of things that he did when he vacationed in Pine Grove as a child with his family.

Let me just tell you about a few people on my list. The first one, of course, is my father, who died at the age of 66 after fighting a virulent type of cancer that was hard to identify, which was identified in May and he expired the evening of August 16, 2003.

I must say that watching him suffer and fight the disease was the most heart-wrenching thing I've ever seen in my life. But to watch him die was the worst thing I've ever seen in my life. To watch him still fight for life when he knew that it was all over, it was difficult, and we had to reassure him that we would be okay, and that he could go.

The second person on this list happens to be his best friend, who suffered from brain cancer and died approximately in 1980 at the age of 50 years. He had several surgeries. He sat in our living room, and I served him coffee and refreshment as he enjoyed the company and visitation of my father.

Many, many of my father's and my mother's friends are afflicted. But more than that, more of my friends and family and their families are afflicted. We can go down the street, and just about every other household was affected.

As a young person, as a teenager, I was babysitting to raise some money, and I would take care of the children in the neighborhood. The first child I took care of was under the age of three, and he suffered from leukemia.

He couldn't play with the other children in the neighborhood because he -- his immune system was so compromised from the treatments that he was receiving for the leukemia that his parents had to fence -- actually fence him in or he would escape and go play with the other children where he was susceptible to picking up germs and things that would make him ill and threaten his life.

So to walk up and down the street where I would catch the school bus and wave at the young boy behind a fence. Literally, he was a prisoner in his own home.

Two doors down from his location there was a young girl nine years old who was my sister's friend where she had sleepovers. We had little parties together. We played at the beach. There were many, many fun times that we shared with that family. She died at the age of nine years from tumors on her spine.

Appendix A

She suffered greatly, but she accepted the fact and was a brave young soldier, much braver than I as I cried at her funeral. I could not believe that a young person could be taken from such a terrible and devastating disease.

As time went on, it wasn't much time, but more and more folks started to come down with certain types of cancers. But they seemed to be the same -- brain cancers in men, leukemia and lymphomas in children. We had many, many prominent people in the community lose their life to this devastating disease, people who had lived here and made this their home and brought their children up and enjoyed the same amenities that we did living in such a pristine area with all the natural resources available on the Niantic River, which left us to be less than two miles from the location of Millstone when it was built.

They came into the area and proposed that we were going to have lots of energy, lots of electricity, at a very cheap rate, non-polluting. You're going to have your streets basically lined with gold.

Well, as the people in the community went to work there, and took in the information that was given to them about their safety, they accepted that. (MPS-6-5) They accepted that working there posed some risk, and that they would be exposed to some types of radiation. But never were they told that they were not protected fully.

So on this list I have many workers that were there and are not with us any longer. Three of them happened to be in a department entitled Site Maintenance. (MPS-6-6) In 1993 -- excuse me, 1994, that department was deleted. Those people were met at the door and told that they had lost their jobs.

Why? Well, they talked about it being downsized. Well, in reality, three people in that department with brain cancer probably scared them to death, especially when two of them died. The third remains alive but does not enjoy the quality of life that any of us do. He can't walk. He is confined to a wheelchair. He cannot leave his home.

He was a loyal employee of the plant, went to work every day, vomiting, headaches. There is no treatment left that can help him. He has lost all of his function as a person that I knew and loved.

This goes on and on. Just across the street, I went to high school: My classmates developed cancers. Their parents developed cancers. They lived on Jordan Cove. They lived around the corner. They lived along Spidhead Road, Logger Hill, Niantic River Road -- the avenues as they are described, the small neighborhoods -- Misphan Court, 10th Avenue.

People that were ill and went on experienced a certain degree of remission until the cancer came back and took them. And when I was burying my friends at the age of 31, and watching their families left to figure out what to do -- how do we handle this? Who do we talk to about this?

Gee, it was my husband, and it was his father, and they were only separated by years apart, but they had the same disease and they both are dead, and they're both buried in the same plot.

Females that went on to have their legs amputated because bone cancer had taken them. Pardon me, at age 11 they developed this disease.

Many people along different avenues, but more importantly across Jordan Cove on Shore Road, picked up a lot. We had my friends, their fathers, dying from this terrible cancer, the same type of cancer developing in a father and in his son, separated no greater than a year -- many things such as Gail has -- Gail Merrill has informed you about, things that do happen and you cannot turn away from.

As I said, I'm just a citizen. I'm just a community member. I'm just somebody that knew these people. These are people that were in my life. They were my friends. They are people I went to school with and played sports with, and they're not here any longer. I have to speak for them. I have to make you aware of the fact that they have died and suffered, and their families continue to suffer, and the heartbreak goes on and on and on.

One brilliant young lady who went to law school but passed from liver cancer one month prior to graduation. It was another heartbreak to learn that her brother and mother accepted her law degree posthumously.

Now, these people are not just people that have done, and, you know, got sick and died. They could have been -- they were contributing members to the community. They were loved. They were entitled to life, not entitled to suffering and death.

People who owned businesses that no longer are in existence because their owner/operator has expired -- expired after suffering a breast cancer that left them lingering for years. This has been very cruel. We have people that were in the same family but maybe not in the same household but across the street and down the street and your next-door neighbor.

Then there were many, many people that I knew of indirectly, and I've added them to this list because they count. And, again, many of them are located on Seabreeze Drive. Why Seabreeze? Who knows? Why 5th Avenue? Who knows? The way the wind blew? We'll never know.

Appendix A

(MPS-6-7) We now know that the radiation that was released got into our water. We drank from wells. It became part of the soil that we grew our gardens in, and certainly it was in the air that we breathe, at times when they had scheduled releases of radioactive effluent, and then at other times that they had non-scheduled radioactive releases.

Twenty-two of, as I know, in the year 1978 when the facility tried to keep that quiet from -- that then Governor Grosso. Boy, when she found out, she was mad as a hatter, and she went right down.

And I don't exactly know what the outcome of that was, or what the punishment was, and the only reason that they even knew that they had these unscheduled releases was because people along the coast, the submarine base, people all the way to Maine had their monitors reacting, going off, and they were wondering, where is this radiation coming from? So apparently on those days the wind blew north.

Millstone has also been linked --

FACILITATOR CAMERON: Cynthia, are you almost finished?

MS. BESADE: I would say one or two more minutes.

FACILITATOR CAMERON: Okay.

MS. BESADE: Thank you.

MS. BURTON: Excuse me. I have to change a tape, if you don't mind.

FACILITATOR CAMERON: How long is that going to take, Nancy, because we really need to go on.

MS. BESADE: I'm sure it's -- she's got it in her hand.

MS. BURTON: Okay. Thank you.

MS. BESADE: Thank you. Once again, I just have another short comment, and I'll be through. Thank you for your attention.

Many of the cancers on my list involve children, as I've stated earlier. The list includes a high school student just across the street at Waterford High who was diagnosed last -- in the last couple of years with ovarian cancer. She survives at this time, but who is to say for how long. And tell me why a young person in the 10th grade should have to deal with something like that.

(MPS-6-8) To the extent that this exposure to radioactivity from Millstone was responsible for my father's death, and the deaths and illnesses of my friends and neighbors, these deaths and illnesses were avoidable. And something could have been done. We could have been told. We certainly could have been warned, not reassured that there was no threat to the public after any incident at the plant -- the standard line that's always given.

So at this time, I cite the reports filed with the NRC by the expert witnesses for the Connecticut Coalition Against Millstone that oppose the application for Millstone's renewed license. Why should we -- why should anyone -- any one individual allow them the opportunity to continue to commit the next generations, those that are not even born at this time, that will suffer the ill effects of the radiation, why should we commit them to another couple of generations of pain and suffering and gross disease?

So at this time I say if these deaths and illnesses were avoidable, the role of Millstone is unforgivable.

Thank you very much for your time.
FACILITATOR CAMERON: Okay. Thank you. (Applause.)

Can we have some of those for the -- do you want to put those on the transcript?

MS. BESADE: I will.

FACILITATOR CAMERON: All right.

MS. BESADE: Thank you.

FACILITATOR CAMERON: Melodie Peters.

MS. PETERS: I guess we're two minutes shy of saying good evening, and thank you for this opportunity, including the small section where my integrity as an individual and a lawmaker was challenged.

I am Melodie Peters. I'm a citizen. I'm a former State Senator, 12 years, former Energy and Technologies Committee Chairperson, and currently doing outreach work for Dominion.

I also am coping with cancer in my own family, and was a large part of the reason why I chose not to run again. So I'm not unfamiliar to the issue of cancer and how devastating it can be.

Appendix A

I have confidence in the process, and I have confidence in the expertise of the decisionmakers. And I'm speaking to you gentlemen because I'm assuming that you're the reason why we're having this public hearing -- the ability to be able to testify.

(MPS-14-1) First, let me say I appreciate and support the preliminary recommendations of the NRC staff, which states that the Commission determined that the adverse environmental impacts of license renewal for Millstone are not so great that preserving the option of license renewal for energy planning decisionmakers would be unreasonable.

The State Department of Environmental Protection, recognizing the importance of these plants as a valued energy source -- and I think this was said earlier -- equivalent to 48 to 50 percent of Connecticut's power needs met by Millstone while being clean, efficient, and least costly.

I didn't laugh during your testimonies, and I expect the same respect.

Chose to extend the 1997 operating license while continuing to resolve the reactor cooling issues. I have been told these deliberations are much further along than the last time we met in May and that are nearing completion.

Some of the characteristics of Dominion that I personally admire includes their willingness -- I'm so angry right now I can't even see straight, so I'm going to stick to my text, because I have sat here along with the rest of you since 1:30, being patient, feeling as though I have been criticized and I don't feel like the same respect is due.

Some of the characteristics that I personally have for Dominion that I admire includes their willingness to comply, to problem-solve, and to explore good, sound, and progressive alternatives to avoid future negative environmental impacts and to promote good environmental practices.

An example is Dominion's partnership in the Long Island Sound Foundation, Dominion's thoughtful approach to dry cask storage for spent fuel, and its willingness to study winter flounder.

It is my opinion that Millstone contributes in a smaller way -- this is a personal opinion, different from what others may want you to believe -- in a smaller way, to the demise of our winter flounder. But because they are the big guerrillas, Millstone becomes the easiest target. And they are willing to step up to the plate and make the changes that are necessary.

I sincerely hope that this issue is addressed comprehensively. Millstone 2 and 3 have demonstrated a longer run time in the history of the plants due to the uneventful operations

translating to safety and efficiency. What this means is that Units 2 and 3 generated the equivalent of 90 percent of the power in the same timeframe than when all three units were up.

(MPS-14-2) Recently, the American Society of Mechanical Engineers endorsed nuclear power as a safe and efficient source for supplying energies, and addressing our growing needs. Aside from my own support for renewable energy -- and my record over the 12 years certainly indicates my support for renewable energy, including the restructuring bills.

(MPS-14-3) Aside from my own, the engineers state that most renewable energy sources are expensive, unpredictable, and dangerous to the environment. Nuclear energy could be vital to addressing these environmental issues without creating others.

It states in the generic environmental impact draft executive summary, "If the Millstone operating licenses are not renewed, and the units cease operation, the adverse impacts of likely alternatives will not be smaller than those associated with continued operation of Millstone. The impacts may, in fact, be greater in some areas." And over my years of expertise and research, I concur.

Finally, our needs for energy continue to grow as we develop economically and certainly technologically. Locating and building new generation plants of any kind becomes problematic because of the NIMBY attitudes -- not in my backyard -- the NIMBY attitudes coupled with the state and local restrictions.

Extending the license of already safe and efficient plants seemed to be the wisest thing to do. And I thank you for your time.

FACILITATOR CAMERON: Thank you, Melodie.

Okay. We have Michael Steinberg at this point. And we have another meeting coming up, an open house starting at 6:00. So I'm going to try to adjourn this at 5:30 at the latest. So we have a few more speakers, and I would just ask you to try to be as concise as possible because we are --

MR. STEINBERG: I have a lot to say, but I'll try to be as concise as possible.

FACILITATOR CAMERON: Thank you, Michael.

MR. STEINBERG: Can everybody hear me? Is that better?

FACILITATOR CAMERON: Good. All right.

Appendix A

MR. STEINBERG: Okay.

FACILITATOR CAMERON: This is Michael Steinberg.

MR. STEINBERG: Yes. I'm Michael Steinberg, and I'm from Niantic, and among other things I'm a writer specializing in investigative journalism, and I've looked into -- done a lot of stuff about Millstone. I'm the author of this book "Millstone and Me: Sex, Lies, and Radiation in Southeastern Connecticut." So my point of view should be obvious.

I have an article that just came out in Z Magazine, a national magazine from Woods Hole, Massachusetts. And the article is called "New Nukes," about the U.S. nuclear power industry staging a comeback, and it wants you to pay for it.

And Dominion is one of the leading players in this development -- attempted development of new nuclear plants. So as I said, I'm from Niantic. My family so far has been living in Niantic for five generations. My great-grandfather -- my great-grandparents came over from Scotland, and my great-grandfather, George Kirk, was -- worked in the quarries in this region, including at Millstone, the Millstone Quarry which was very prominent in its day. The quarry is now the discharge canal for Millstone Nuclear Power plant's radioactive -- liquid radioactive waste.

I want to respond to some of the things in the draft EIS, but before that I want to introduce some new material that we've become aware of since that time. Joseph Mangano from the Radiation and Public Health Project gave us some material recently. Mr. Mangano has been interviewed and profiled in The New York Times, USA Today. And the Radiation and Public Health Project has also been interviewed on National Public Radio, among other media coverage.

(MPS-3-2) Mr. Mangano's recent information is that local health declines when Millstone opens improves after closing, in which he reports that the cancer instance rate in New London County was 8 percent below the State in the '50s and '60s before Millstone opened.

After Millstone began operating in 1970, this rate has risen steadily until now it has reached a level 6 percent above the State rate. So that's going from 8 percent below to 6 percent above. So he -- Mangano says that of the over 1,300 New London residents diagnosed with cancer each year, nearly 200 can be considered in excess of what would be expected if earlier levels had been maintained.

So I'm not saying -- you know, nobody I don't think is saying that Millstone is causing all the cancers in New London County, but because of its radioactive emissions it is causing this excess amount, and it's at -- in the historical 35 years it's been going on.

(MPS-3-3) Mangano also reports that about -- infant mortality deaths of children one year and younger. In 1994 and '95 when Millstone was operating, there were 136 such deaths, unfortunately. When Millstone closed -- was closed, pretty much for all of '96 and '97, that rate dropped, and then the number dropped to 105. And it goes into a little more detail in the report I'm going to submit to you after I finish speaking.

One second, please.

(MPS-3-4) This makes it all very, very plain, the way he lays it out. '94/'95, Millstone was operating at 80 percent capacity, and there were 136 deaths, the rate of 7.41. '96/'97, it was only operating at 10 percent. The deaths dropped to 105, which is -- the rate dropped to 6.07, which is over an 18 percent drop.

Now, when they started up again in '98/'99, at first they operated during those years 50 percent. The rate was minus 3.1 compared to minus 18.1, so that's quite a difference. And then, in 2000 and 2001, when Millstone was operating at 90 percent, the rate actually went up 8.8 percent. So that's from minus 18.1 to plus 8.8.

And so I'm going to submit this report to you. (MPS-3-5) It also talks about the tooth fairy project, where this group has been testing Strontium-90 in children's teeth. And what it has found in Connecticut so far is that Connecticut has -- along with Pennsylvania has the highest amount of Strontium-90 on average of the six states that they've tested so far.

And as far as the counties near nuclear plants, which are Fairfield near Indian Point and our county, New London, near Millstone, they have the -- an average concentration, 180 percent more, which is more than double that of the other counties in Connecticut.

And it's known that Strontium-90 doesn't exist in nature, only enters the environment and our bodies through nuclear weapons fallout and nuclear reactor emissions.

(MPS-3-6) Also, what I was trying to talk about before -- Dr. Sternglass sent the NRC a declaration last August which wasn't included in their consideration of the evidence about human health and radioactive emissions, the possible effect on human health. So I'm going to -- you should already have that, but I'm going to just read a few short things out of it to see why I thought it was so important that it needed to be considered.

He says, "I'm a Professor Emeritus of radiological physics at the University of Pittsburgh School of Medicine. I have written and published extensively in the area of low-level radiation in human health, and about the adverse effects of radioactive emissions from the Millstone Nuclear Power Station in particular."

Appendix A

He's the author of a book "Secret Fallout: Low-Level Radiation from Hiroshima to Three Mile Island" published by McGraw-Hill in 1981. He has testified before Congress on this subject. And in brief, what he has -- (MPS-3-7) what he goes on to say is that there is a causal relationship, which the NRC denies between Millstone's radioactive emissions over the years and negative health effects.

As he says, "It is my professional opinion that the radioactive releases from the Millstone Nuclear Power Station, since its startup in 1970, have caused and will continue to cause excess infant mortality, as Joe Mangano just showed us, low birth weight babies, leukemia, and cancer, as well as increased rates of both chronic and infectious diseases in the towns around Millstone as well as in New London County, and Connecticut as a whole." And he goes on in great detail about how he has come to that conclusion.

(MPS-3-8) So I'm going to address now the things in the draft EIS that gave me problems, because at the last meeting I submitted a number of documents pointing to negative relation -- negative health effects from Millstone's radiation. And one of them was cancer incidence in Connecticut counties, 1995 through '99, from the Department of Public Health, Connecticut Tumor Registry, which indicated that during those -- that period, New London County had the highest rate, age-adjusted rate of incidence of cancers, in the State.

And as I also reported before, it had the second highest such rate for males, not to exclude us. It was basically in a statistical dead heat with Tolland County.

Now, in the draft environmental impact statement, it didn't report the fact that males were second highest. And as I stated at the hearing, that they were basically number one also. So we're showing the highest rates in the State, and this is the most current information from the Tumor Registry. Why is that?

I also reported that that report went into specific kinds of cancers, and compared the rates between different counties in Connecticut. And for the number ones, the NRC report characterized them as several.

Now, if I went to Dutch's Tavern in New London and -- you know, to have a few drinks, and I got pulled over by a cop on my way home and he said, "How many drinks did you have tonight?" and I said "several," and he said, "Could you be more specific?" and I said, "Well, actually 12," you know, I don't think he'd be too happy about that, because (MPS-3-9) that's how many number ones New London County had including breast cancer, cervical cancer, uterine cancer, other female genital cancers; liver cancer for males, bladder cancer for males and females, and colon and rectum for females, colon females, totaling 12.

There are six more number twos, five more number threes, seven number fours. (MPS-3-10) And also, I presented a document called "The Radiation Compensation Act," an act of Congress in 1990 that compensated people who were downwind from nuclear testing in Nevada and Utah and Arizona, and as well as uranium miners who were -- basically said that these people were injured in the interest of U.S. national security, and they should be compensated.

And it specified specific kinds of cancers and what -- which establishes a causal relationship, once again, between low-level radiation and specific kinds of disease. In this case, there are too many of them that are on the list of -- where New London County in the Tumor Registry report was number 1 through 4.

For instance, liver cancer, which was the number 1 for males, breast cancer number 1, and multiple myeloma in which for females in the county was tied with Fairfield for number 1, and thyroid cancer number 3.

FACILITATOR CAMERON: (Inaudible comment from an unmiked location.)

MR. STEINBERG: Yes, I understand that. How about three to five more minutes?

FACILITATOR CAMERON: We really -- I mean, we really --

MR. STEINBERG: Well, this goes to the heart -- this goes to the heart of the problem with the draft EIS. I'm just going to skip on to something else that's important to me.

PARTICIPANT: (Inaudible comment from an unmiked location.)

MR. STEINBERG: Okay. Let me -- I'm not going to finish up quite yet, but I have -- next I'm going to talk about (MPS-3-11) in the draft EIS on page 243 it says, in relation to radioactive-type stuff, "The applicant does not anticipate any significant changes to the radioactive effluent releases of exposures from Millstone operations during the renewal period. And, therefore, the impacts to the environment are not expected to change."

Now, unfortunately, from -- this is from Dominion's annual radiological environmental operating report from 2003, where it's talking about Tritium, which is radioactive hydrogen. It says, "Since the restart of Unit 3 in 1998, and Unit 2 in 1999, Tritium releases in liquid effluents have risen to levels at or above those observed in the pre-shutdown period."

Now, the Tritium releases into Long Island Sound are at record highs for Millstone. And so that doesn't agree with the conclusion of the NRC, which says they're going to stay the same.

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Now, when Mr. Emch and I talked after the meeting last May, I raised this concern with him, and he informed me that there are filters that could be put on so that the Tritium levels could be lower, and that they're expensive.

But I think it's incumbent that Dominion take action right now. We know in the past that they've taken such action. Unfortunately, they had to be coerced into it -- as I learned from this report, a corporate profile of Dominion resources by public citizen in Washington, D.C.

(MPS-3-12) They violated the Clean Air Act and, in April 2003, Dominion -- VEPCO agreed to a \$1.2 billion enforcement settlement. \$1.2 billion -- that's about the same as they paid for Millstone -- with the U.S. Department of Justice and the U.S. EPA for violations of the Clean Air Act.

The EPA charged VEPCO with failing to obtain the requisite permits for significant modifications it made to its coal-fired power plant in West Virginia that resulted in increased power generating capacity. The Clean Air Act requires that such modifications be accompanied by the installation of pollution control equipment to mitigate environmental contamination.

Well, VEPCO neglected to install such equipment, which according to the EPA resulted in the release of "massive amounts" of sulfur dioxide, nitrogen oxide, and particulate matter. So, obviously, they're not going to do it of their own free will, if they did that kind of massive pollution in West Virginia.

But it's incumbent upon the NRC and the State Environmental Protection Agency to have this filter -- these filters installed immediately.

(MPS-3-13) I'm against the operation of Millstone right now, and I certainly don't think it should be relicensed. But -- and this -- any relicensing application that has come before the NRC has been approved. It's really just a rubber stamp process. And so I -- I'm afraid it's going to happen against my will and the will of many other people.

But it should be made a condition of the relicensing as you rubber stamp their application, that they put on these filters right away, because the position of the nuclear industry is to operate at maximum capacity. The more these Unit 2 and Unit 3 operate because of their design, the more Tritium is going to get poured into Long Island Sound.

Just as an example, in 2003, the operating capacity of Unit 3 was 99.8 percent. And for Unit 2, it was 80 percent, but that was only because it had to shut down for refueling.

I have a lot of trouble with all of the -- and I'm going to wrap up now. (MPS-3-14) I have a lot of trouble with all of the -- this entire Section 4.7, evaluation of potential new and significant information on the impacts of operations during the renewal.

I gave one example with a document about cancer rates from the Tumor Registry report. But it -- other information that I presented was not represented accurately, which, I had more time, I would go into. And all in all, it indicates to me a bias on the part of the NRC in favor of the nuclear industry. And that was characterized by the fact that -- how they treated the information that I presented.

(MPS-3-15) But the fact that Dr. Sternglass' declaration from last August was somehow not considered whatsoever, and the fact that the NRC consulted with Dominion, with Department of Health here, the Department of Environmental Protection, who basically all have the same position on this issue. They're talking to themselves, where nobody talked to Dr. Sternglass, nobody talked to Joseph Mangano, or anybody else in the Radiation and Public Health Project.

And so you're not really representing the public when you don't talk to people who have a different point of view, which is the whole point of why we're here, because these people are presenting evidence that shows why our loved ones are suffering these diseases here.

And so until there is some great reform or the NRC is abolished, along with the nuclear industry, we're not safe, and we're right back where we were in 1995, 10 years ago, when everybody said -- all the people in power said, "Everything is okay." John Roland came to Millstone and said, "Everything is safe there."

And then -- then they had to be shut down, you know, for over two years, and you had to plead guilty to 20 Federal felonies and pay one big, old fine, etcetera, etcetera. So the same game is going on; the face has changed. But this game has gone on too long. This game is over.

These plants need to be shut down, and it's criminal to relicense a place like Millstone.

Thank you. (Applause.)
 FACILITATOR CAMERON: Okay. And you're going to give us some things for the record, which we'll appreciate.

We have two final speakers. Mitzi Bowman, would you like to come up? Then --

MS. BOWMAN: (Inaudible comment from an unmiked location.)

FACILITATOR CAMERON: No.

Appendix A

MS. BOWMAN: No?

FACILITATOR CAMERON: I don't mind if he goes first.

MS. BOWMAN: You don't mind. Okay.

FACILITATOR CAMERON: No. This is Peter Bowman, and I know that if we need to pay attention to -- more attention or explain better why we didn't respond to comments last time, we'll do that.

There's been a lot of talk about the tooth fairy study. There is an NRC background publication on the table back there that also talks about the tooth fairy project, for those of you who are interested in seeing it.

And, Mr. Bowman, thank you.

MR. BOWMAN: My name is Peter Bowman. I am the coordinator of a group that is based in New Haven, Connecticut. It's called Don't Waste Connecticut. We've been involved in energy issues for many, many years, and we're part of the Coalition Against Millstone. (MPS-4-2) And we certainly will not subscribe to this impact statement that's being presented today.

I have two or three comments on what I heard, and, by the way, I would just preface my remarks by saying that Dr. Sternglass and Joe Mangano have been mentioned a number of times, and are certainly very, very valuable resources, but I would say we have a resource center in New Haven, and I have a whole list of papers that have been published in peer review journals on the effect of low-level radiation on health.

I don't have it with me, but if anyone is interested, they could see me and I'll try to get a copy of these papers to them at some point.

The first thing I'd like to talk about is the ICRP, the International Committee on Radiation Protection. It was mentioned earlier in the presentation that the releases from Millstone were based on the fact that IC -- that we're well within the ICRP limits.

Well, the ICRP -- the International Committee on Radiation Protection -- is a self-appointed body, mainly from the nuclear industry, and along with UNSCEAR, which is the United Nations Scientific Committee on the Effects of Atomic Radiation, they have been the main setters of standards in the world for the last 40 or 50 years.

They base their findings mainly on the victims of Hiroshima and Nagasaki and the health effects that occurred after the bombs were dropped on Japan. But since then, (MPS-4-3) there has

been very much research done at the cellular level, which has shown -- and this is pointed out in the BEIR V, which is the National Academy of Sciences -- the Biological Effect of Ionizing Radiation -- in BEIR V, they make the statement that any -- any amount of radiation can cause harm.

So a single ionizing event of radiation can cause harm, and that's what is being looked at at the cellular level. And at this point it's being shown that the ICRP and those bodies that are setting the standards are 100 or even 1,000 times off the base.

And where we couldn't account for many of the leukemia and cancer clusters in various parts of the world, it's shown that if you discount ICRP and start to look at some of the cellular research, such as the bystander effect, which is where an ionizing track passes by a cell, a nearby cell, it doesn't have to touch the cell, but the energy given off will affect the cell.

And then we have the second event theory put out by Chris Busby in England, whereby DNA -- the DNA is hit by an ionizing particle and a second event occurs within a short period of time before the cell can -- the DNA cell can repair the damage, and then it mutates.

These have been shown -- this research has been shown to account now for these cancer clusters that we see around nuclear facilities. And I would urge people to go beyond the ICRP and UNSCEAR and look at some of the more recent research.

In the UK now, they have the -- in Europe, I should say, they have the European Committee on Radiation Risk, which looked at the ICRP model and found it's badly flawed, and we should be looking in other directions at that, which they are doing.

Another thing that came up was the question of cost benefits, and what wasn't mentioned, at least I didn't hear it, was Price Anderson. Now, as most of you in this room know that Price Anderson -- Price Anderson Act was initiated in the '50s, which allowed the nuclear power industry to go operate.

The nuclear power industry didn't want to operate, because of the liability, because of the unknown factors that were -- that was in there, not just after the use of the bomb, etcetera. And the Price Anderson Act covers the insurance to a certain degree of the nuclear industry and let's them off the hook for liability.

And I think someone pointed out earlier that you can find that out, if you look at your homeowner's policy, or your automobile policy, you'll find that they have exclusionary clauses in there which they will not pay you one cent for any damage that's caused by radioactive contamination.

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So your home, your automobile, and all of your possessions, if they ever become contaminated from a release from Millstone or any other place, you won't get one penny for it.

(MPS-4-4) Price Anderson -- I don't know what the fund is now, but it's probably around \$9 billion. But it's been estimated that an accident on the scale of the Chernobyl accident, or something like it, probably runs into \$3- or \$4- or \$500 billion. And so there's no cost-benefit there, and that's not even mentioned in this impact statement.

(MPS-4-5) And the other question was evacuation. I always laugh at evacuation, because as far as I know, there has never been -- in a nuclear plant in this country, there has never been a full-scale drill as to what evacuation would -- how it would occur. I know they have had drills with the first responders and that type of thing, but the public, who are the people who are supposed to be protected by this evacuation plan, have never been involved in an evacuation plan.

And when you think about it, when they talk about the 10-mile limit, how could they be? Is the radiation going to stop at some invisible wall at 10 miles, and the person living 10.1 miles away is going to sit in their house while the other 50,000 people are running down the road? I don't believe it.

Anyway, it's getting late. It's been a long day. And I -- that's about all I've got to say for now. But don't -- don't use the ICRP model as your model for radiation. That's my main point.

Thank you.

FACILITATOR CAMERON: Thank you, Dr. Bowman. Watch your step. (Applause.)

Mitzi?

We have one more. Mitzi. Our final speaker is Mitzi Bowman, and we'll try to put the microphone so that it's easy to use here.

Mitzi, how is that?

MS. BOWMAN: Thank you. There isn't too much more to say. Well, there really is, but there's not much more time. But I just wanted to talk to the love affair between the corporations that produce this poison and the government agencies and agencies such as the DEP and the EPA and the ICRP -- this love affair between them that allows these lies to be told.

And it looks like the reason for what's going on now, the extension of licenses, is that our administration right now has said that they want about 50 -- at least 50 more nuclear plants in

the country. And they're going to need time, because it takes a long time, especially when people like us get up there to fight back -- it takes a long time to build these plants.

And I think they need these extensions of licenses in order to give time for a new wave of nuclear power, (MPS-5-6) where all the money and subsidies, our taxpayer subsidies -- including the Price Anderson Act -- will be going to these new plants, costing billions and billions of dollars, while that money, if we needed that much subsidy -- if we had that much subsidy -- going to clean energy, energy efficiency, solar, and wind, we wouldn't need a single oil plant or a nuclear plant. We could have a whole country filled with clean energy and no cancers from it.

And by the way, I was told to mention -- I'm sorry, Pete -- Pete, too, has metastatic prostate cancer. So we are all suffering from this, and you guys who are promoting it should be ashamed of yourself. Look into your consciences.

And I have a lot more to say, but I'm not going to say it now. Thanks. (Applause.)

FACILITATOR CAMERON: Thank you, Mitzi. And thank all of you for your comments and patience. And, Andy, would you like to just close it out for us? Thank you.

MR. KUGLER: Obviously, I want to be very brief at this point. I'd just like to thank everybody who did come out today. I want to thank you for your patience. It has been a long afternoon, but we did want to hear what everybody had to say.

I want to remind you that if you do have other comments on the draft environmental impact statement, you can submit them either in writing or by e-mail through March 2nd. And we will be staying around after the meeting has ended. If you have any additional questions or if you want to talk to members of the staff, we'll still be here.

And with that, I just want to say, again, thank you for coming.

FACILITATOR CAMERON: And we'll be back at 7:00 for a meeting tonight, and 6:00 open house.

Transcript of the Evening Public Meeting on January 11, 2005, in Waterford, Connecticut

MS. MERRILL: Excuse me. It's not a 12-fold increase. (MPS-15-1) It's 12 different cancers, the highest of which are around Millstone Nuclear Reactor because New London County has the highest cancer.

So I said to you, given these findings, I don't understand how you could say that there is no big link between cancer and Millstone.

Appendix A

MS. BESADE: I'm Cynthia Besade from Uncasville, Connecticut.

(MPS-16-1) I would like to ask you, how did you analyze the data from the Tumor Registry and come up with what your conclusion is? You just stated that Waterford had one of the lower stats. Well, that stack is several hundred feet high. So whatever is coming out of that is getting into whatever prevailing winds are at that level and traveling.

How did you analyze those statistics and come up with the fact that you don't think that there is any correlation between your emissions of radiation and cancer in this community?

MS. HERBERT: This is a follow-up. (MPS-17-1) I'm wondering, what geographic area did you decide upon on this issue and why? I mean, you're saying Waterford. Millstone is close to a lot of communities.

MS. WINSLOW: My question is about this study with Haddam Neck. (MPS-18-1) Haddam Neck shut down in 1996. And, besides which, it was only one reactor, and we had three operating here. So the study is totally irrelevant to Waterford and Millstone.

MS. WINSLOW: (MPS-18-2) I noticed that you talk about things that could happen with the reactor, but you don't mention any fires in the spent fuel pool or any act by a malicious individual on the spent fuel pool.

And those are accidents that would still be possible with Millstone in the license renewal period, whether it was in the wet storage of the proposed dry cask storage.

MR. SCHWARTZ: I want to address what you just said and what that gentleman just said. But (MPS-19-1) it is an environmental impact if a terrorist attack, for example, releases -- and I have a big problem. That is my principal concern for coming tonight. The gentleman up there said you cannot quantify it, and that is correct.

But I think that the way I would quantify it is very high. You quantify it looking pre-9/11 in the report. And you use the word "small" and you define small. I think that is a big error.

I realize that the NRC is addressing it, but I think that it has to be in an environmental impact statement because it is the biggest threat to the environment, far greater than any of these SAMAs.

MS. WINSLOW: Just I wanted to go back to where I was before. (MPS-18-3) Aside from the malicious thing I brought up -- I'm sorry I did at this point -- I still feel that the spent fuel pool having an accident on its own without anybody provoking it is still not a severe accident in your report. And so I have a contention with that.

MS. WINSLOW: (MPS-18-4) My point is you are adding 20 more years of spent fuel to this mix of what you have already got. So it is going to increase the risk.

V. PUBLIC COMMENTS

FACILITATOR CAMERON: We're going to go to public comment now, but let us make sure that this microphone is working.

Okay. We're going to listen to some of your more formal comments at this point. There were issues raised during the questions and answers. There were also comments. And we will look carefully at those to make sure we consider those as comments.

Betsy Ritter, Representative Betsy Ritter? Is she here? Betsy? Come up here. I'm sorry.

MS. RITTER: Thank you. I will mostly be brief because it is my understanding it's continuing to snow. I want to just start by thanking the NRC and the Town of Waterford for the time that they have put into allowing this to be here in the host community as well as making provision to allow everybody the time this afternoon and this evening to come in and comment.

I also want to thank everyone who came tonight because it is a very important part of our process that this be very public and very open. The questions that you raise are important to the process. And, one way or another, I think that it's a critical affirmation of the openness that we are trying to achieve here.

(MPS-20-1) I want to speak in support of the relicensing effort by the power plant. The Town of Waterford, the surrounding communities, as well as the State of Connecticut have very clearly benefitted from its presence here in Waterford for many years.

I know that this is a very lengthy process and I think that it -- and it is an expensive process, of course, for everybody, the State, the town, emotionally. We have heard a lot of testimony tonight to that effect. And it's a sort of, as I said, a tribute or an affirmation to our process we let that happen, but I also feel very strongly that, as I said, not just the town and the communities, but the State are benefitted by the presence of the power plant and the extension of the license.

(MPS-20-2) One way or another, we need electricity. We need electricity to conduct our businesses. We have set up a huge infrastructure. Our huge way of living is dependent on this. And we can continue to explore the many, many other alternatives, alternate power sources. And we should do that, but it's undeniable that, certainly at this point in time, this is what we have to go ahead and do. And I want to support it.

Thank you.

Appendix A

FACILITATOR CAMERON: Thank you, Representative.

Next we're going to go to Brian, Brian Vachris from the Town of Waterford. Brian?

MR. VACHRIS: I'm glad everyone could show up tonight. I'm Brian Vachris. I'm on the town Board of Finance. I'm not officially speaking for the board, but (MPS-21-1) we do have some concerns about the fact that there would be a tremendous loss of tax revenues if these plants were to close.

I might also mention that I'm a nuclear test engineer at Electric Boat Corporation. So I am a little bit familiar with the design and operation of these plants.

I haven't had time to review the 2,900 pages of submittal that were in the application. If I do see anything that I need to comment on in writing, I will do so before the date. I don't know that I will, though. The parts that I have read look fine to me.

One of the statements that was made earlier perhaps should be slightly corrected regarding the town's finances. Low rates are based on the grand list, not just on tax revenues because some taxes come from other sources of taxation, such as income or sales tax, and are distributed by the State from the State general funds.

(MPS-21-2) As far as the town goes, Millstone currently represents about 51 percent of the grand list. And there we're looking at property taxes. So effectively if the plant weren't there, the tax rate would be doubled, projecting forward to 2015. It's about the 34 percent of the grand list.

So, again, the tax rate that we're projecting for that year forward, which are kind of far-out projections, would be 50 percent higher. And at the town's current level of expenditures, we would see tax rates and mill rates in the high 30s, just so that all of you who are residents of Waterford are aware of the importance of the power plants to the town in terms of its tax base.

I guess one of the other things that I might say is that there are a lot of people in this community who are familiar with the nuclear industry. They are not only the employees at Millstone, but they're also employees at Electric Boat and people who are employees at the local submarine base of the United States Navy.

(MPS-21-3) This community supports nuclear power. And there are people. And I have been in some of these hearings before, and I have seen some of these people before who are very much against it. But the bulk of the community and those of you who have run for public office and have gone door to door in this community -- I know several of you who are here know that there is no widespread opposition to nuclear power in this community.

So I commend the NRC staff for being here. Thanks for listening. But know that you have a good and favorable host community here. (MPS-21-4) And I do hope that to the extent technically feasible, you will extend the licenses of these plants as long as possible.

Thank you.

FACILITATOR CAMERON: Thank you.

And GERALYN WINSLOW is our next speaker.

MS. WINSLOW: I've got a lot of stuff here. I need to go through this comment book because I have little sticky notes in here that have comments that have to do with this report. And I need to look through there.

I only have five minutes or how long can I —

FACILITATOR CAMERON: Five minutes is a guideline. If you go over a couple of minutes, that's fine.

MS. WINSLOW: Okay. I received your little report in December, about two weeks before Christmas, when I had a few other things to do. And I've tried to go through it, which I have. And I do have a lot of things to say.

If I could go through the book and sit down one on one, it would be the preferred option of talking about what I have seen in this report. And I'll try to go over the things that I have said here.

Do you want to talk about new information versus old information in the book? It seemed like everything I had said at the May 18th meeting was old information. I'm sorry that it's old information, but it's still pertinent.

(MPS-18-5) There is new information, which I have today to submit. And it's from Joseph Mangano from the Radiation and Public Health Project. He sent me these graphs, which show all of the local health declines when Millstone opens, improves after closing. And he has all of these graphs.

I'll just submit them. I won't go through them all here, but this one is the thyroid cancer. It's so obvious I just have to show it.

So this is the new information that I have to offer today. And I still want to go over a little of the old information and some of the things I saw in the report.

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(MPS-18-6) Small, medium, and large. You guys spoke about that. It's meaningless. It's all relative. And, really, to say an impact is small, you have no figures or no numbers. It's all through the book. It really doesn't mean a lot to me.

And then I'll just go through the book and where I wrote things down about the water.

(MPS-18-7) And the fact is that Millstone uses massive amounts of water, which you guys did mention, to coolant systems. And chemicals must be used to keep its water system functioning.

I said this at the May 18th meeting. It was not mentioned tonight, (MPS-18-8) but I still would recommend that Millstone build the cooling towers, especially after reading this report. It would save some of the fish and other wildlife in our area.

(MPS-18-9) The water does go back into Long Island Sound. And it's full of tritium. And the more that the plant runs at full power, the more tritium gets put back into Long Island Sound. That's not new, but it's a fact, and it's an environmental fact.

I'll just say when I went through the book, I wrote down "impingement." I wasn't sure what that meant. And it's a nice little term that means kill, kill the fish and other living organisms. And it might be small, but it still happens.

(MPS-18-10) I did look at this on the environmental impacts and the geographic distribution and having to do with environmental justice. And you claim that, again, you say it's small, the impact of environmental justice on the people that live around Millstone, but what it doesn't look at is the whole picture because in justice, environmental justice, is caused when the low-level waste is shipped to Barnwell, South Carolina and it's environmental justice when the uranium that's used to make the fuel is mined on Native American land and when the waste goes out to the goat chutes in Utah. That's environmental justice. And it does happen. It's not part of this report.

Also, as far as this report goes -- and I heard a lot of it tonight -- (MPS-18-11) I don't understand why socioeconomics is part of this report. It's an environmental report. Do you mean socioeconomic environment versus a natural environment? Because the emphasis in the report is on socioeconomics. It is not the NRC's job to be concerned with the economic impact of relicensing. And you did mention that you have to have that.

My comment on this aspect of the report is a strong objection to the emphasis placed on the economic impact of relicensing. Okay.

And, finally, (MPS-18-12) the obvious objection I had to this report is the separation of the waste issue from relicensing. And I did get to speak about that a little bit. High-level waste is a major problem that our government can't seem to solve in the nuclear industry.

This report, in typical NRC fashion, obfuscates the truth with its vague language and overwhelmingly useless data meant to hide the truth that have been presented here in these reports and today by the Coalition Against Millstone as well as the information that I had stated at the May 18th meeting.

Today we have new information that nuclear plants are causing harm to our families and our precious environment. And I'm standing by the old information that I have submitted and continue to object to the license renewal at Millstone Nuclear Power Station. But mostly as a person, as a citizen, (MPS-18-13) I'm saddened by the thought of 20 more years of Millstone operating and saddened for future generations, which will be adversely affected by our need and our greed for more nuclear electricity.

Thank you for my chance to make these comments.

FACILITATOR CAMERON: Thank you. (Applause.)

FACILITATOR CAMERON: Thank you for those specific comments, Gerry. And I would just remind everybody that the comment period is until March 2nd to submit further written comments.

I believe just one clarification is that the -- and I'll let my colleagues correct me on this if I'm wrong, but the NRC, like any other Federal agency, is required under -- the requirements to do an environmental impact statement has to include a socioeconomic analysis as well as impacts on the natural physical world.

We have Doug Schwartz. Mr. Schwartz?

MR. SCHWARTZ: I just want to follow up on a couple of points the previous speaker made. I'm not sure if the intent is to obfuscate, but it certainly appears that way. And I think part of the problem is because it needs to be run by an English major, rather than be written by engineers, the report.

(MPS-19-2) In one instance, the way numbers are handled, \$1.5 times 10^9 , when I have no idea whether that was an attempt to obfuscate or just an engineer writing that, but it should have been one and a half billion dollars for the cost of the catastrophic cleanup.

Another instance, the speed in which evacuation could happen was listed. There would be a delay of 7,200 seconds. It's in there. I'm sorry. Normal people use two hours. And as a

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constructive criticism for the NRC, if you don't want people to think you're obfuscating, don't use that kind of language. Have an English major clean it up.

(MPS-19-3) I have a big problem with the Commission's standpoint that the staff basically at this level isn't going to deal with the clear terrorist threat to the nuclear power plants in the country. And so my comments are generic about that. And they're specific about the threat to Millstone.

I think it's silly to do an environmental impact statement without quantifying, although it can't be quantified, the threat from terrorists and give it a very big role.

Five years ago, if someone did something comparable to an SAMA on the World Trade Towers, the engineers would have come back and said, "Very little chance of them ever collapsing." But three years ago, we know that there was a big chance of that happening.

The way I calculate it, Millstone is probably one of the ten leading terrorist targets in the country. And I'll tell you how I get there.

In any interview that Khalid Sheikh Mohammed gave in -- I believe it was for the first anniversary. He gave it with al Jazeera of September 11th. He said that they had talked in the latter part of the 1990s. They had planned initially not to attack the World Trade Towers. They had planned to attack nuclear power plants, but they were afraid that, quote, "it would get out of hand," end quote.

Now, what did he mean by that? I think he meant that their experience with doing relatively small and rationing up attacks on America, that there wouldn't be any overwhelming response. Well, it did get out of hand. And the World Trade attack was sufficient to trigger an overwhelming response from America.

Number one, they had planned to attack nuclear power plants, but they skipped it and went to the World Trade Center. Number two, there is some intelligence on September 11th the flight that went down in the field in Pennsylvania was either targeting a building in Washington or that they would go after a nuclear power plant.

Then the NRC issued a memo on January 23rd, '02. They had a senior al Qaeda member in custody. They interrogated him. He said that they were going to use planes to attack nuclear power plants and that there were already three people on the ground in the U.S. to facilitate those attacks.

In December of '03, you'll recall there were some flights cancelled coming over from Britain and France. On January 4th, '04, the Sunday Times of London reported that the intelligence behind those flight cancellations was that power plants were going to be attacked by jets on the East Coast.

Now, if I'm not mistaken, I believe there are two to the east of us in New Hampshire and Vermont. And I don't think anybody thinks that the terrorists are going to attack power plants in New Hampshire or Vermont. But with Millstone, you get the trifecta. I would think that Millstone and Indian Point are very prime targets and Millstone especially because it is on the flight path going into New York airports.

We had a great deal of overflights in this area, patrols by all sorts of aircraft, helicopters, Coast Guard jets going by at four or five hundred feet during daylight hours, right after dark. And it went on for quite a while, for the better part of a year or more, I believe. It ended sometime this fall, I believe. So something is up.

I don't know what they thought they could detect from the air bringing a jet over at 100 feet and what they could see or detect. I would suspect that they were nuclear detection things trying to figure out if nukes were getting smuggled in.

I think that that is totally wrong. I think the nukes are here. The nukes are the nuclear power plants. And they're going to be used against us. We have zero air defense at Millstone or any other power plant. And I disagree.

By the way, I have been to the NRC's Web site this week. And I looked up. They do have a lot of good information. And it's clear that the Commission is paying attention to the concerns of citizens and our representatives. And we voiced our concerns to our representative in this district, our congressional representative. But nothing is being done.

And earlier one of the staff members said that he thought that in ten years, when the license renewal kicks in, that he would assume the government has got to do something about it. I happen to be a Federal employee, and I wouldn't share that assumption.

It's been three and a quarter years since the 9/11 attacks. And, if I'm not mistaken, I think the guards at Millstone here still don't have automatic weapons because of our dysfunctional State and Federal legislatures. They're not as well armed as the terrorists attacking our troops right now in Iraq.

Our guards should have heavy duty automatic weapons, just like the guards for the inauguration in Washington this month. If you have seen any of the pictures, they're very heavily armed. And they should also have things like RPGs and everything to stop vehicles.

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(MPS-19-4) My concerns with the EIS are primarily section 5 and what I said earlier. It's complete ludicrously to just ignore and quantify it as small and SAMA as a terrorist attack. I found one mention of the word "terrorist" in the entire document, and that was quoting me from a scoping hearing. I believe there's one mention of sabotage.

re. But there's something else I left out of the equation. In September, CAIR, the Council for American-Islamic Relations, opened up their first office in New England. And they opened it up right here in New London. They are a very litigious organization.

I'm not saying that they are a terrorist front, but many, many people, including U.S. senators on down -- I believe they are banned from the White House -- say they are basically a terrorist front and a terrorist fund-raising organization. Their executive director at their New London office is an engineer who works for Dominion.

I'm very concerned about the terrorist threat. There is zero air defense. We were lied to by our government. We were told that jets would be scrambled, not that that would do any good, that jets would be scrambled.

And Murray Renshaw, who was going to be here tonight -- he was here. I think he took off because of the snow. He has a very vivid debunking of that myth with a videotape he took on Labor Day. They made a number of circles around the plant. And they got down to an elevation of around 50 feet above the stack. They kept spiraling down doing lazy circles. And he showed that to thousands of people on his TV show. So it's not a secret. It wouldn't do any good to scramble jets anyhow.

So basically my concerns are attacks from the land, the air, and the water. And, by the way, when I brought up this issue with Congressman Simmons on Murray Renshaw's show, he said -- and the more I think about it, the more I think he is right -- that he was more concerned about a water-based attack.

And although we have plenty of intelligence, which -- I just enumerated that they are planning to attack nuclear power plants specifically on the East Coast using airplanes. So what are they going to do?

I'm very heartened. I think it's a good sign that the dry cask storage thing is getting underway and got approval. And that will do a great deal of good to remove that threat.

My only concern there is I would suggest -- I think, if I recall, I read in the paper that the concrete covers on the casks were going to be about four-feet thick.

I'm not an engineer, but I would think that that might not withstand a jet slamming into it. I would just urge that it be buried deeply in the gravel.

From the air, I think we need to defend from the air the same way that we design nuclear power plants today, that it be a walk-away thing, that if something goes wrong, it doesn't require human intervention and that you can just walk away from the problem. And it doesn't allow decision-making to enter in; in other words, whether to shoot down something.

I think we should declare a no-fly zone over Millstone and every other nuclear power plant. I don't think it's a big deal like they're trying to make out. We have a no-fly zone over every airport in the country. I think there should be automatic anti-aircraft guns in there, that if you stray into that zone, you're toast.

I think there also can be low-tech solutions. This is not the first time we have used this in this area. In the Seventeenth Century, Groton was ground zero, in America in the Seventeenth Century, when the worst slaughter of Native Americans occurred in New England.

In the Eighteenth Century, Groton was at ground zero once again when the British killed the defenders of Fort Griswold and as a percentage of our population, two and a half times as many people died on that day as died on 9/11.

What they did do to make sure in the War of 1812 that it wasn't repeated, they came up with a simple but eloquent low-tech solution. They forged a giant chain, which stretched across the mouth of the harbor. And if the British were sighted, they just pulled up the chain.

I think we should do something similar with Millstone. Planes are very fragile instruments. The wings will get ripped off easily if they encounter cables or anything. We run cables into Millstone now. I think we should just make a net. It sounds silly, but if you think about it, I don't think so.

And, finally, on water-based offenses, I'm concerned probably more than anything about them disrupting the flow of water in or blocking the flow of water out of the intakes and the exits. By flying planes in, al Qaeda had scuba-trained individuals. We know this from the intelligence. They had been training for that.

So I think some sort of baffles. I think some sort of nets or whatever to keep planes and divers and specifically some sort of detection system for all of that.

The stuff I have read on the Web site is encouraging. Clearly there is a lot. It's clearly classified, but clearly a lot is being done in terms of detection and preparation of the guards to handle an attack from the ground. But little or nothing is done from the air. And from what I can gather, not too much is being done from the water.

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I don't see how this application can be improved by ignoring these environmental realities. There is a very real threat of making a big, huge mess out of this whole region or the region around any nuclear power plant. And I just don't buy the logic that the NRC is using.

Thank you.

FACILITATOR CAMERON: Thank you. Thank you for that analysis, Mr. Schwartz.

We are going to go to Gail. Gail?

MS. MERRILL: Thank you very much. I would have been a little more prepared, but I didn't know which order we were going in tonight. Sorry.

I am here tonight -- some of the people from the NRC and Dominion or whatever have heard me speak earlier today, but for those of you in the public and for the new reporters, the green party that is here recording, I'd like to tell you why I came two hours one way to be here.

My mother, living in Long Island, New York, about 12 miles away down wind from Millstone Nuclear Reactor has died of breast cancer. And I got it 11 months later, 20 years earlier than she did, because I grew up with the nuclear and chemical industries. She didn't. My grandmother never had it. My tumor is not genetic.

So I came here because there is nothing more important to me than my safety. And for all the time spent on reports, I guarantee you I spent more time in chemo. Okay?

The gentleman who made the comments about working for Electric Boat and worrying about the finances of Millstone, personally that comment is incredibly offensive to me. I don't give a damn about Waterford finances. I don't think Millstone has a right to threaten my life. And that's what I am faced with.

When you get your cancer if you live here long enough -- I'm saying "when," not "if" -- I think you might reconsider. You can't take the money with you when you die.

And I faced that a long time ago. My family is Merrill Lynch. It doesn't matter how much money I have. What matters is that I am alive. It humbles you very quickly. There is nothing more important to me. I don't give a damn about travel, parties. Who cares? It's a moot point if you're dead. So it's a very big deal to me. Okay? So you understand where I'm coming from.

I, too, have been working with Radiation and Public Health Project. Dr. Sternglass, who had his conversation with Einstein when he was only in his 20s, helped to stop the above-ground nuclear bomb testings that blew across the country.

(MPS-22-1) It was documented in St. Louis baby teeth. They documented with 35 baby teeth so far that the highest level of strontium-90, the radioactive plants are causing nuclear emission in our baby teeth. The highest is around towns living closest to Millstone Nuclear Reactor and Indian Point Nuclear Reactor. They've documented it.

(MPS-22-2) The highest cancer rate according to the Tumor Registry of Connecticut, which is our official Tumor Registry, the oldest and best in the country apparently, the highest rates are in New London County. And also then following that, the highest towns are right around Millstone Nuclear Reactor.

So I dispute the NRC's findings that there is no cancer link. I think it is so blatant. And I think anyone who denies it -- okay? -- it means who is following the money trail, folks.

So now you know my family history. The other thing that I came here to say is that I have watched far too many women -- and now it's actually 14-year-old and 15-year-old girls, more than one at each age, with breast cancer in the State now. That comes from our Tumor Registry. Check it out for yourself.

I have watched five women that I know of that I was told of die of breast cancer in my area in Fairfield County. Okay? Too many women in their 40s in too many different town. I know of too many women in their 30s getting double mastectomies and getting the cancer right back again. Now, you guys don't understand it. You don't got boobs. But we got boobs, and women talk. And if they don't have it, they're terrified of getting it because they're seeing what is happening to their friends.

Where I live, we don't have any toxic sites, no superfund sites. We're 25 miles down wind from any points. (MPS-22-3) I'm hit by both nuclear reactors. I'm within that 100-mile radius. That radiation.org documented statistically proves the risk for breast cancer mortality is greatest if you're within the 100 miles.

This woman at a nail salon says, "Who's next?" She knew 4 women in their 40s with different kinds of cancers. So that's my problem. It's not just my personal history. It's not just my mother's death. It's the women around me. And it's younger and younger and younger.

And you women probably are going to hear about it, especially if you bother to ask. Okay? You guys have to start asking too, because you're going to have a woman in your life who is going to be affected by this. And I hope to God there is an ounce of integrity and you're not just here doing your jobs in your suits because we are dying. And it's incredibly scary if you are on the receiving end, like I am.

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These maps that I have here, I'm going to show this to everyone to see, God included. (MPS-22-4) This is the government maps, no dispute, folks. The government that employs the NRC has funded and done these maps. Okay? This is the breast cancer mortality link to nuclear reactors.

If you look at it visually and follow the pattern, we know that if it was just the hormones and the meat, the disruption to the hormones and the hormone replacement therapy feeding hormone-driven breast cancer tumors, the whole country would be in red for breast cancer mortality. But it's not.

(MPS-22-5) The areas of high breast cancer mortality line up with the location of nuclear reactors. And that is why the Northeast has the highest breast cancer mortality.

Then take a look at California. Take a look at Texas. Only one small dot in Texas that is in red, right where the nuclear reactors are.

So you can see this visually. You can see it documented with the tooth fairy project done by radiation.org. You can talk to your friends. You can look at your cemetery. In Westport, the new side of the cemetery had lots more young deaths, 40 and 50-year-olds, as opposed to long-term life happening. Okay?

That's what my friends and relatives and nurses and doctors and hospice workers are saying in my area. It's an epidemic, folks, and it's deadly.

And we're not just talking breast cancer. We have trials with leukemia, lung cancer. The daughter of strontium-90 is Yttrium if I have it pronounced right. Maybe my pronunciation is a little bit off. But I just learned this last night from Dr. Sternglass.

So it goes into your bones and teeth, the strontium-90 does. It acts like calcium, lowers your immune system, your thyroid functions. You are vulnerable to cancer, bacteria, and viruses. And then the daughter comes along and goes to the soft tissues, like lung cancer. So if you know people with lung cancer who never smoked, you might want to investigate that.

Dr. Sternglass, by the way, has been pursuing the low-level radiation health risks related to nuclear reactors for some 40 years. And he has testified as an expert. Go investigate it. It's quite stunning.

So my pet peeve, too many of us have cancers in too many different towns. I'm down wind. I may not be as close as you all. Thank God. But I'm down wind.

You need to close Millstone Nuclear Reactor. Too many of us don't want to die. I don't think anybody in this room would volunteer for that job. We have a right to be safe. We want to stay alive.

Anyone here with integrity? Okay? That's what it comes down to.

FACILITATOR CAMERON: Okay. Thank you very much.

MS. MERRILL: Thank you. (Applause.)

FACILITATOR CAMERON: Cynthia, did you want to say a few minutes' worth? I didn't know whether you wanted to comment again. But I'm going to hold you to the five-minute guideline.

MS. BESADE: Good evening, everyone. My name is Cynthia Besade. (MPS-16-2) This is my father, Joseph H. Besade. He worked vehemently to close Millstone, to stop the poison from emitting from the stack into our bodies, causing cancers of all sorts of variations, killing children at such a high rate it's hard to keep track of.

He lost seven of his coworkers. He worked for 20 years as a nuclear pipe-fitter at Millstone. And seven of his coworkers died of this very same disease that he passed from a little over a year ago.

Earlier today at the earlier session, I read from my list. I have a compilation of approximately 67-plus people. I'm going to put my father down for just a moment. This evening, as I went home and took messages from my answering machine, I learned that another relative has just been diagnosed with terminal lung cancer. Her husband passed, my uncle and aunt, my godparents.

My uncle passed from lung cancer -- actually, it was also esophageal cancer -- six weeks before my father. He lost his friends, his seven coworkers. He became the eighth. He knew too many people who worked at Millstone lived nearby that passed away.

(MPS-16-3) Our friends, our family, my classmates, my friends, their parents, their children, so many families have been destroyed by this terrible disease that has taken hold of our community, disease that we can only associate with ionizing radiation.

Yes, of course, cancer comes from other things. And we do live in a highly industrial society. However, you can only take a small sample from different contributors. You can only write off so many cases.

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(MPS-16-4) There is now information, recent information, that gives us the ability to say that there is a correlation between these cancers, these access cancers, especially the ones in children, that says that there is a causal relationship.

Yes, I spoke earlier about wanting to know, how did you analyze the same information and come up with your findings when many people have taken a look; in particular, Joe Mangano, Dr. Sternglass, for many, many, many years.

The very first report I read from Dr. Sternglass was a study that he conducted in this area, in the New London County area, from 1978, 1978, when I first discovered that there was a problem, when I was sitting with my friends holding their hands as they are dying and they are in comas and they're passing away. And I am saying to myself, "Why is this?"

Why are the children that I baby-sit for? Why did they contract cancer? They live just down the street from me. They live two or three houses away from each other. And we buried them as well. And their families are still crushed, and they don't have any answer. But they all surmise it has to be something in the neighborhood. We're talking about less than two miles down wind.

My parents bought a home in 1963 to raise their family in one of the most pristine areas as he wanted us to have the same sort of ability to enjoy the natural resources in the Niantic River or the wonderful things that this area presents that are now gone.

When you talk about the winter flounder, we brought home bushel baskets of winter flounder, so much that we couldn't possibly consume it. We froze it, of course. We gave it to our relatives. We gave it to the neighbors. And we even had so much we sold it back to the fish store. For what? For more money to go fishing, to enjoy the pleasures that were there.

(MPS-16-5) Now, we ingested that shellfish and we ate that fish. And we ate the stuff that came from our garden. And now we know. And we drank the water from our well. And now we know that that radiation found its way into the soil and into the air that we breathe and most certainly into the water as well.

And that is irrefutable. The data is there. We have to stop this killing machine. We cannot commit the next generations, those yet unborn, to the ravages that we have experienced. This is horrible. The grief that these people and these families experienced, it doesn't go away. It's with you for a lifetime.

I drove back here in shock to realize that another one of my family members, another person in my life that I now need to add to the list that I submitted earlier -- my list continues to grow.

What am I supposed to think? This is not something that has been imagined. This is not something that people just conjure up. Why in the world would I want to even be standing here talking about this terrible thing that has just occurred again in my family when my heart aches for this man, somebody who dedicated over eight years of his life to make it right, to get this thing out in the public, to get you folks informed, and to ask you please to participate.

Stop the killing machine. Close Millstone today. Thank you very much.

FACILITATOR CAMERON: Thank you, Cynthia.

Nancy, do you want to take a few minutes?

MS. BURTON: Good evening. I am Nancy Burton. And I'm here speaking on behalf of the Connecticut Coalition against Millstone in opposition to this license renewal application and to speak about the draft environmental impact statement.

I spoke earlier. Some of you here heard what I had to say. I won't repeat it. But I have some information that I would like to add to what I presented before.

(MPS-23-1) What I neglected to say was that our review of this document shows it is very seriously flawed. If this is an environmental impact statement, it is difficult to understand why it omits to analyze the chief environmental impacts of this nuclear power plant on this community.

Some of those issues have been addressed here already this evening. (MPS-23-2) Terrorism is certainly one major omission. (MPS-23-3) And certainly the health issue is a second major omission.

At page 4-53 of this report, it states, astonishingly, "No evidence has been presented to report a causal relationship between increased cancer incidence and Millstone operations." That is simply not a true statement because the proceedings before tonight were replete with information and evidence linking Millstone with cancer. But after tonight, the NRC cannot make that statement again in good faith. That is going to be a lie.

(MPS-23-4) This evening, the NRC has received evidence that is irrefutable linking the emissions from Millstone, routine emissions, with pollution and contamination of the environment, which we see manifest in dozens and dozens and dozens and dozens of people in this community.

(MPS-23-5) We know from Millstone's reports that its strontium-90 has found its way less than two miles down wind to goats because it is revealed in their goat milk. Well, if the strontium-90

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is found in goat milk, we know it must also be found in the grass, in the water, in the air, and in people. And can anybody not understand here how it ends up in the teeth of children in this community? You have the evidence. It's here tonight.

Now, with that evidence -- let's just not stop there. Let's understand what needs to be done because the killing time is over. We have had enough suffering.

Go to Seabreeze Drive. I didn't bring tonight but I will be very happy or not happy, not at all happy, but (MPS-23-6) I will dutifully present to the NRC a map of the different house locations on one street in Waterford. This is Waterford, Connecticut, supposedly doesn't have elevated cancer from Millstone. This is less than two miles down wind northeast from Millstone, at least seven incidences of cancer on that one street. Most of them now death.

And that only covers a very recent period of time. And, unfortunately, we have just learned of another case within the past couple of weeks.

We will present a map that has that information for you people to reveal. And you will in your final environmental impact statement concede that Millstone causes cancer in this community at unacceptable levels.

(MPS-23-7) And from there, you will determine to close Millstone. But before you do that, you will determine that there should be immediate action taken; for instance, filters. The strontium-90 that escapes through the vent at Millstone and contaminates this community can be blocked. Engineers know how to do that.

There is a cost factor involved, costs money. So what? Why should that plant spout radiation to this community when it is not necessary and it is killing people? Filters can be put there.

(MPS-23-8) Let me move into another area, which is a major oversight in this so-called environmental analysis. And that has to do with discharges, both to the air and the water of pollutants.

There is no documentation in this entire environmental impact statement of the chemicals; no identification of the hundreds of chemicals, many of them caustic, carcinogenic agents that are used at the plant routinely and flushed out into the Long Island Sound along with radioactive waste agents. It is unnecessary for this pollution to occur.

Why doesn't it say that in this environmental impact statement? It's so simple. It can be stopped. That is an alternative. The way to stop it other than shutting Millstone is to convert it to a closed cooling system.

Why isn't that mentioned as a present alternative to the way that the plant is operated now? If the plant were converted to a closed cooling system, that would: a) eliminate the discharge of the caustic chemicals to the Long Island Sound; b) eliminate the thermal plume to the Long Island Sound.

(MPS-23-9) Heat of the sound is one of the factors you people say is one of the causes for the loss of fish, but you don't think the thermal plume with the loss of fish. At the same time, such a closed cooling system would have the effect of virtually eliminating the killing of the indigenous fish species.

In 1993, Northeast Utilities analyzed the prospect of converting to a closed cooling system and found that it could be done and it could be economical. That was 1993.

Along came Dominion, the new report cited by your people in your analysis. It can't be done because it is too expensive and the benefit wouldn't equal the effort, the money term, no reference to the 1993, which said that it could be done and it could be done economically.

So we would encourage you to do what you said you did, but it sounds like you really didn't do this, which is to go into the community on a fact-finding discovery mission. Find that 1993 environmental report that Northeast Utilities filed. Go to the hospitals. Talk to doctors.

(MPS-23-10) When you analyzed the loss of fish, winter flounder, in your report, you state that you spoke with the DEP. You don't name anyone from DEP. You don't provide any documents from DEP. You just regurgitate what you say somebody said to you from there. That is not a very scientific methodology.

(MPS-23-11) At the same time, you didn't talk to fishermen. You said that you were concerned that over-fishing was responsible for depletion of the winter flounder. You didn't talk to fishermen. You didn't go back and talk to the expert, Mark Gibson from Long Island, who was able to persuade a judge of the Superior Court of this State to shut down Millstone Unit 2 to spare the winter flounder back in 1998. Why didn't you talk to him?

Instead, you talked to a consultant. You called his work "independent," but the consultant, Mr. Crivella, actually was a consultant paid and hired by the utility. You don't say that in your report.

Why didn't you talk to Victor Crecco at the Department of Environmental Protection? Why was your bias so manifest in your report?

FACILITATOR CAMERON: Nancy, I'm going to have to ask you to wrap up.

MS. BURTON: Because this is a defective document. I will. I certainly will.

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(MPS-23-12) I have to point out one blatant misstatement of fact before I step away. And that appears at page 843, where the NRC is arguing against wind power, against solar power, against conversion to same methods and has this to say about replacement power. This is section 8.2.4. This is talking about alternatives, "If available, purchased power from other sources could obviate the need to renew the Millstone OLS, operating licenses. It is unlikely, however, that sufficient baseload from power supply would be available to replace the Millstone capacity. Connecticut is a net importer of power." That is simply not true.

You don't attribute that statement to any source, but we would recommend that you go to the Web site of the Connecticut Sighting Council. That is a State agency. Its responsibility under law is to create projections of electrical need and current generating capacity.

If you go to their Web site, you will see that there is not only no need to import power to Connecticut; power is exported. We have excess power. And even if we took out Unit 2 and Unit 3 from Millstone, we would continue to have excess power, even at times of peak demand.

So all of this is incorrect information, 8.2.4, very important, because if the NRC does what it is compelled to do in lights of the fact that have come out, and that is shut Millstone, this community will suffer a boon, a real estate boon, because people will be very pleased to live in an area where it was once unsafe because of an operating nuclear power plant. And there will be plenty of electricity. The lights will go on. And it's not even necessary to call upon the conservation. So I would encourage you to check your facts, correct the facts, do a proper environmental survey.

(MPS-23-13) The people who weren't here earlier don't know that Long Island wasn't notified of this meeting. The supervisor of the Town of Southold, 22,000 people, his jurisdiction extends over Fisher's Island, which is within the 10-mile evacuation zone, they were not notified of this proceeding until the last minute.

They came. They protested. They pointed out -- and I would agree with them -- the defect of this proceeding by failure of notice. Under Federal law, National Environmental Protection Act requires meaningful public opportunities for public participation. And that is at the basis of it.

So I thank you very much for the time.

FACILITATOR CAMERON: Thank you. Thank you, Nancy. (Applause.)

MS. BURTON: I will be providing more written comments.

FACILITATOR CAMERON: Good, good.

MS. BURTON: Thank you.

FACILITATOR CAMERON: We will look forward to that.

Mr. John Markowicz?

MR. MARKOWICZ: Yes. For the record, I am John Markowicz. And I am co-chairman of the Nuclear Energy Advisory Council. I was introduced earlier this evening in responses to questions regarding the case study that had been requested by the Nuclear Energy Advisory Council in the late 1990s and was published in 2001.

As I indicated, the Nuclear Energy Advisory Council is a creature of statute. It has 15 volunteer members, no paid staff. We are supported by the Department of Environmental Protection and their Hazardous Radiation Health Division.

We used to hold monthly meetings during the restart process because of the concern within the community. And the reason basically why the organization was put together was to observe and to provide additional public input and oversight into the restart process.

With that having been successfully accomplished, the issues that are faced by the Energy Advisory Council have basically diminished. In fact, the public meetings that we held this past year with the passing of Joe Besade were pretty much not even attended by the public.

I would like to note that we did meet last year. And in one of the meetings -- and this is for the record. This is not a comment on the DEIS. I do regularly review the performance reports that are submitted as inspection reports by the regulators and by the headquarters staff. And I do read them, and I do review them.

The NRC has a color-code system they look at. And the way they report deficiencies when they find them is a green light and other colors. The operations of the plant over the past 24 months have been basically green, which is good, with the exception of Millstone 2, which had two reactor trips in March of last year. And there is a 12-month evaluation so they go white, which means they get additional inspections by the regulator. And they got them. And those inspection reports were published. And the utility received a passing grade.

And that white symbol on Millstone 2 will expire at the end of this current quarter if I remember the rules correctly, the end of March or the next reporting cycle, which would be the end of June.

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(MPS-24-1) So what I am trying to put into the record on behalf of Nuclear Energy Advisory Council is the report to the public is that since the restart of the Millstone plants, Millstone's 2 and 3, they have been operated in a safe manner. In fact, based on that performance, there is no reason why I would recommend to the Nuclear Energy Advisory Council that the council vote to oppose the continued licensing of the plant.

I would note for the record and, as I did this afternoon in a different capacity, that, as you heard this evening, (MPS-24-2) there is palpable concern within this community regarding the security of the nuclear power installation, not so much the dome, more the spent fuel.

And through a number of different events that I participate, some with the Coast Guard, some with Homeland Security, some with other agencies, I am, in part, aware of activities that are going on to ensure the safety and the security of the plant. Somehow we have to do a better job of communicating that to the general public.

And since it is not covered in this report for reasons that were mentioned earlier and reasons that were mentioned earlier this afternoon, (MPS-24-3) (MPS-24-4) I respectfully submit that the abstract or some portion of the report address the absence of the security and the emergency preparedness elements of environmental issues from the report so the public is assured that something is going on and that it is just not being addressed in this report.

Thank you.

FACILITATOR CAMERON: Thank you, John, for that report and that suggestion.

I don't think I missed anybody. Did you want to say something?

MR. MARKOWICZ: Yes.

FACILITATOR CAMERON: Come on up.

MS. NATUSCH: I'm Lauren Natusch from New London, and I had three points that I wanted to make.

(MPS-25-1) I did want to support the objections that people have made or their concerns regarding security. I heard you say that you are not waiting for license renewal to assess this and implement safeguards, but I was not particularly reassured because what I really want to hear you say is that you are holding license renewal pending assessment of this threat and implementation of safeguards.

(MPS-25-2) My second point is I object to the risk assessment for winter flounder as moderate. If I understand you correctly, you were saying that because there are so many other risk factors for the flounder, you can't figure out exactly how important this particular risk is.

I want to say that the risks are cumulative. And when you have a flounder population that is already endangered, any additional risk factor becomes more than moderate. It becomes critical. It becomes larger than large. It could be the last straw.

And related to that, (MPS-25-3) I have heard a lot of testimony tonight about risk factors for the people living in this community. We seem to be having cancers. And it's very hard to pinpoint exactly what the causes of those cancers are.

The effect of all sorts of toxins in our environment is cumulative. And I want to suggest that, like the flounder, we are a vulnerable population and that any additional risk is unacceptable.

Thank you. (Applause.)

FACILITATOR CAMERON: Thank you, Lauren. And I think at some point the stenographer may just want to know how to spell your last name. Okay? All right. I think it's probably time for Andy to close out for us. I thank all of you for coming tonight, some of you for coming twice today. And thank you very much. Andy is going to close out the meeting for us.

VI. CLOSING/AVAILABILITY OF TRANSCRIPTS, ETC.

MR. KUGLER: I just want to thank you also for coming out this evening, particularly with the weather that we're having. One thing that I will ask is that you all be very careful going home. I'm not sure what the road conditions are like, but I know they were not supposed to be very good. So please be careful going home.

As mentioned, if you want to comment on the draft environmental impact statement after tonight, you can do so in writing or by e-mail through March 2nd.

In addition, if you have any additional questions this evening, the NRC staff, we're here. We'll stay around to answer any questions. We would be happy to talk to you after we are done.

That is all I have.

FACILITATOR CAMERON: Thank you.

(Whereupon, at 9:35 p.m., the foregoing matter was adjourned.)

Appendix A

A.6 Letters and E-Mails Received on the Draft SEIS