

**CONNECTICUT COALITION AGAINST MILLSTONE**

www.mothballmillstone.org

September 7, 2005

Hon. Graham Wallis
Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555

Re: Millstone Nuclear Power Station

Dear Chairman Wallis and Fellow Committee Members:

Please accept these comments for consideration at your meeting on September 8, 2005 in Rockville, Maryland. We will be "attending" the meeting via teleconference and appreciate the opportunity to provide supplemental verbal comments at the conclusion of the meeting.

We request that you defer a final decision on the Millstone relicensing application until the State of Connecticut has an opportunity to provide its input. Please see attached correspondence to Governor M. Jodi Rell, in which we have requested that she establish a task force to review the technical aspects of the application. To date, to our knowledge, the issues under consideration in the Safety Evaluation Report ("SER") have entirely escaped review or consideration by the executive and legislative branches of the state.

We express our chagrin that none of the issues we presented in person to the Subcommittee of the Advisory Committee on Reactor Safeguards on April 6, 2005 in Rockville, Maryland, is addressed in the final SER. For example, we provided the Subcommittee with information regarding Millstone's history of equipment failures, poor maintenance, inadequate inspections by the NRC, and continuing waivers of safety standards by the NRC which practice erodes public safety as the reactors undergo aging. The SER does not address any of these issues. We shared with the Subcommittee the tragic story of Zachary M. Hartley, born with a rare life-threatening cancer in his face. Zachary's mother swam unwittingly in the Millstone nuclear "mixing zone" which extends to the public beaches in East Lyme CT and thereby was exposed to dozens of radioactive and chemical carcinogens routinely released by Millstone into the Niantic Bay. Zachary's case is not isolated: the community surrounding Millstone is riddled with cancer. Millstone's radioactive and toxic emissions are to a large extent responsible. Indeed, Dr. Helen M. Caldicott, world-renowned pediatrician and expert

on the health effects of low-level ionizing radiation, concluded, after reviewing Zachary's medical records and Millstone's effluent release records, that it is highly likely that Millstone effluents are to blame for Zachary's medical condition. As the Millstone reactors age, they will release more, not less, toxic and carcinogenic agents to the surrounding community. The SER does not address this issue.

Since the April 6, 2005 Subcommittee meeting, an extraordinary series of events occurred at the Millstone Nuclear Power Station which jeopardized the health and safety of the residents of Connecticut and which resulted in unusual releases of radiation to the environment. We refer to the emergency shutdown of Unit 3 and the Class II emergency declared on April 17, 2005. The NRC concluded that a "tin whisker" protruding on a circuit board caused a short which tripped the reactor. Pandemonium followed in the control room when the instrument panels displayed incorrect information about plant systems. Unit 3 remained shut down for two weeks, during which period other "tin whiskers" were identified. The NRC permitted Millstone Unit 3 to restart without requiring that other identified "tin whiskers" be replaced. This event illustrates misfeasance and malfeasance on the part of Dominion Nuclear Connecticut Inc. as well as the NRC. Astonishingly, the SER makes no reference to Millstone's "tin whiskers."

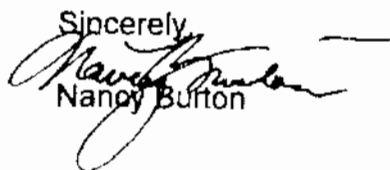
The SER does not take into account the prospect that Millstone's owners and operators will shortly apply for an "upgrade" to increase station output of electricity - a prospect that represents planned refurbishment that is omitted from the SER.

Similarly, the SER does not address the likely prospect that Millstone will be required to convert to a closed cooling system by the state Department of Environmental Protection or by court order, nor the U.S. Department of Homeland Security order issued in August 2003 directing Dominion to install waterborne barriers to guard the intake structures from terrorist attack. Such projects constitute planned refurbishment which is not addressed in the SER.

We oppose Millstone relicensing. Since 1970, thirty-five years ago, when Millstone Unit 1 went online, the community has suffered quite enough ill effects: hundreds if not thousands of cancer victims, extinction of the indigenous fish stocks, contamination of our public beaches, threat to property values from increasing build-up of deadly atomic waste, and the constant threat of sabotage.

We urge you to scrutinize the issues we have identified as having significance and to extend your period of review to allow the public authorities of the State of Connecticut to provide technical input.

Sincerely,



Nancy Burton

Please respond to:
147 Cross Highway
Redding Ridge CT 06876

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September 7, 2005

Hon.M. Jodi Rell
Governor
State Capitol
Hartford CT 06106

Re: Millstone Nuclear Power Station

Dear Governor Rell:

On September 8, 2005, the U.S. Nuclear Regulatory Commission's ("NRC") Advisory Committee on Reactor Safeguards ("ACRS") will meet to determine whether to approve relicensing of the Millstone Nuclear Power Station for an additional 20-year term.

To date, the issues under consideration by the ACRS have entirely escaped review or consideration by both the Executive and Legislative branches of the State of Connecticut.

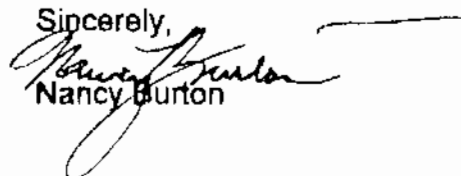
We write to urge you to establish a task force equipped to engage qualified technical consultants to evaluate the complex issues now being considered by the ACRS and, ultimately, the Commissioners of the NRC.

Further, we request that you ask the ACRS to defer its final decision on the Millstone relicensing application until the State of Connecticut, through your offices, has an opportunity to thoroughly evaluate the complex application.

Nuclear operations at Millstone present the gravest threat to the health and security of the people of Connecticut.

We appreciate your urgent attention to this request.

Sincerely,



Nancy Burton

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