

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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January 10, 1984

Docket No. 50-423
B10995

Director of Nuclear Regulatory Commission
Attn: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit 3
Certification of Compliance of Operation with the
Connecticut Coastal Area Management Program

This letter is sent in conjunction with the application to the Nuclear Regulatory Commission for the operating license for Millstone Nuclear Power Station, Unit 3, as committed by Northeast Utilities Service Company. It describes how the approval and operation of Unit 3 will be consistent with the Connecticut Coastal Management Program.

The following describes how, in relation to federal, state, and local legislation, the Millstone Nuclear Power Station is a national interest and coastal dependent facility. State and federal laws require that these facilities be given priority and adequate consideration in planning. Additionally, the consistency required by state law between the Connecticut Coastal Zone Plan and the Connecticut Plan of Conservation and Development is described.

National Interest Facilities

The State Coastal Management Program is required by the Federal Coastal Zone Management Act (FCZMA) to provide for the consideration of the national interest in the planning for and siting of facilities that are of more than local significance. 16 U.S.C. 1451 (i). The FCZMA policies include giving priority consideration to coastal-dependent uses and orderly processes for siting major facilities related to energy. 16 U.S.C. 1452 (2)(c). In keeping with these FCZMA requirements and policies, the general goals and policies of the Connecticut Coastal Area Management Act (CCAMA) call for the State and coastal municipalities to provide adequate planning for facilities and resources which are in the national interest. C.G.S. 22a-92 (10). The CCAMA definition of facilities and resources which are in the national interest encompasses energy facilities serving statewide and interstate markets, including electric generating facilities. C.G.S. 22a-93 (14).

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The Millstone Nuclear Power Station is a national interest facility as defined above. As further explained below, the approval and operation of Unit 3 is consistent with the need for municipalities and the State to make adequate provisions for facilities and resources that are in the national interest.

Included in the FCZMA and CCAMA definitions of national interest facilities and resources are tidal wetlands and related estuarine resources. 16 U.S.C. 1453 (2); C.G.S. 22a-93 (14)(A). The existing tidal wetland on the Millstone Site property is protected by state law and has been designated as a natural resource in the Waterford Plan of Development. Consistent with these policies, the wetland and its immediate surroundings are being managed as a wildlife area by Northeast Utilities.

The Connecticut Coastal Management Program map of Shellfish Concentration Areas shows areas believed to support and produce significant concentrations of shellfish, specifically Hard Clam and Eastern Oyster. These areas extend 1000 to 2000 feet from the shore of the Millstone Site. These areas are included in the FCZMA and CCAMA definitions of national interest resources.

Consistent with FCZMA and CCAMA policies regarding these resources, Northeast Utilities, in conjunction with the Connecticut Department of Environmental Protection and the Nuclear Regulatory Commission, conducts a continual ecological monitoring program that addresses the potential effects of the operation of the Millstone plants on marine benthos. Sampling has been conducted since 1969. Jordan Cove supports a small recreational harvesting of quahogs, but there is no commercial shellfishing around Millstone Point. No other portion of the Millstone Site has been designated by the State Coastal Management Program as a resource of national significance. The operation of Unit 3 therefore, will have no adverse effect on any resources of national significance, and its approval is therefore consistent with FCZMA national significance and CCAMA coastal resource policies. C.G.S. 22a-93 (15).

Consistency of the State's Plan of Conservation and Development and Coastal Zone Plan Regarding Energy Facilities

The State Plan of Conservation and Development (C&D), adopted by the Governor pursuant to C.G.S. Section 16a-24 to 16a-33 calls for the identification and preservation of sites and areas which are necessary for facilities needed to support the generation, transportation, and storage of energy to meet future needs (Energy Resources Policy E, Action 3). The Plan's Locational Guide Map identifies the Millstone Site as one of those areas, pursuant to State Action A-3, Conservation Areas, and then requires that those sites and areas developed or designated for major facilities supporting the generation, transportation, or storage of energy should be preserved for this purpose (Guidelines for State Action B7). The CCAMA requires consistency between the Coastal Program and the State C&D Plan. C.G.S. 22a-92 (d). The approval and subsequent operation of Unit 3 would therefore be consistent with these policies and guidelines.

Water Dependent Uses

The State Plan of Conservation and Development Policy (1) (A) for federal, state and municipal agencies calls for giving highest priority and preference to water

dependent uses and facilities in shorefront areas. C.G.S. 22a-92 (b)(1). The CCAMA defines "Water Dependent Uses" as those uses and facilities which require direct access to, or location in, marine or tidal waters and which therefore cannot be located inland, including, but not limited to, industrial uses dependent upon waterborne transportation or requiring large volumes of cooling or process water which cannot reasonably be located or operated at an inland site. C.G.S. 22a-93 (14).

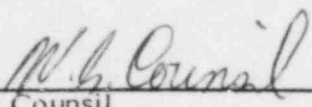
This is consistent with the FCZMA policy to give priority consideration to coastal-dependent uses and orderly processes for siting major facilities related to energy, and the location of new commercial and industrial development in or adjacent to areas where such development already exists. 16 U.S.C. 1452 (2) (c). Like the existing Millstone Units 1 and 2, Unit 3 is a water dependent use. Its approval and operation is therefore consistent with this policy, and it is located where such development already exists.

In keeping with NU's support of the Coastal Area Management Act since its passage, we have continued to work closely with the Town of Waterford while it has developed its Coastal Management Program to ensure consistency of the use of the Millstone Site with federal, state, and local coastal policies.

If you have any questions, please contact Ms. C. J. Shaffer, Generation Facilities Licensing, at (203) 666-3285.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL
By Northeast Nuclear Energy Company, Their Agent



W. G. Council
Senior Vice President

cc: Tina Suarez - Murias
Connecticut Coastal Management Program
Connecticut Department of Environmental Protection
71 Capitol Avenue
Hartford, Connecticut 06115

STATE OF CONNECTICUT)

) ss. Berlin

COUNTY OF HARTFORD)

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Sheila M. Pates
Notary

My Commission Expires March 31, 1986