

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: : DOCKET NO. 265

PROPOSAL OF DOMINION NUCLEAR :
CONNECTICUT, INC. TO MODIFY THE :
EXISTING MILLSTONE [NUCLEAR] :
POWER STATION TO ESTABLISH :
AN INDEPENDENT SPENT FUEL :
STORAGE INSTALLATION (DRY :
STORAGE SYSTEM) ON PROPERTY :
LOCATED OFF ROPE FERRY ROAD :
IN THE TOWN OF WATERFORD, :
CONNECTICUT :
MARCH 22, 2004

RECEIVED
MAR 22 2004
CONNECTICUT
SITING COUNCIL

CONNECTICUT COALITION AGAINST MILLSTONE AND CO-PARTIES'
PROPOSED FINDINGS OF FACT

The Connecticut Coalition Against Millstone ("CCAM") and co-parties Geralyn Cote Winslow, Clarence O. Reynolds, William H. Honan and Dr. Milton C. Burton (collectively, CCAM") submit herewith their proposed Findings of Fact as follows:

1. Millstone Unit 3 has sufficient storage capacity in its spent fuel pool to accommodate its continued operations through 2013.
2. Millstone Unit 3 has sufficient storage capacity in its spent fuel pool to accommodate its continued operations and the continued operations of Unit 2 through past 2008.
3. Unit 2 produces 870 megawatts of electricity at full power.
4. Non-nuclear electric generators which have come online in Connecticut since 1997 generate a combined 3,162 megawatts of electricity.

5. The electricity produced by Millstone Unit 2 is not needed in Connecticut because of the excess generation of electricity by new non-nuclear sources.
6. Millstone Unit 2 has an unreliable record of generating electricity.
7. The applicant failed to demonstrate that there is a public need for the ISFSI within the meaning of Connecticut General Statutes §16-50p.
8. The applicant failed to demonstrate that the ISFSI satisfies a public benefit within the meaning of Connecticut General Statutes §16-50p(c).
9. The application is incomplete insofar as it fails to provide sufficient information by which the Council can assess it pursuant to Connecticut General Statutes §16-50p.
10. The application does not meet the standards of Connecticut General Statutes §16-50p.
11. The site is unsuitable because of its size, location and the physical constraints of the site.
12. There is a reasonable probability that the U.S. Nuclear Regulatory Commission will impose new standards for dry cask storage such they they be robustly designed to withstand malevolent attack.
13. The dry cask storage facility proposed by Dominion does not meet such standards and it is vulnerable to malevolent attack which would have widespread devastating consequences.
14. Prudent and feasible alternatives include: early shutdown of Unit 2; use of "post-911" canisters; onsite burial; transport of nuclear waste to the

Commonwealth of Virginia; and transfer of Unit 2 spent fuel to the Unit 3 spent fuel pool.

**CONNECTICUT COALITION AGAINST
MILLSTONE
GERALYN COTE WINSLOW
CLARENCE O. REYNOLDS
WILLIAM H. HONAN
DR. MILTON C. BURTON**

By: 
Nancy Burton
147 Cross Highway
Redding Ridge CT 06876
Tel.: 203-938-3952
Fax: 203-938-3168
Email: nancyburtonesq@aol.com

CERTIFICATION

This is to certify that a copy of the foregoing was mailed on March 22, 2004 to the following via U.S. Mail, postage pre-paid:

Robert L. Marconi, Esq.
Assistant Attorney General
Ten Franklin Square
New Britain CT 06051

Kenneth C. Baldwin, Esq.
Robinson & Cole, LLP
280 Trumbull Street
Hartford CT 06103

Lillian M. Cuoco, Esq.
Dominion Resources Services, Inc
Millstone Nuclear Power Station
Rope Ferry Road
Waterford CT 06385

Robert A. Avena, Esq.
Kepple, Morgan & Avena, P.C.
Box 3A Anguilla Park
20 South Anguilla Road
Pawcatuck CT 06379

Mark R. Sussman, Esq.
Murtha Cullina LLP
CityPlace I, 29th Floor
185 Asylum Street
Hartford CT 06103-3469

James S. Butler, Esq.
Southeastern Connecticut
Council of Governments
5 Connecticut Avenue
Norwich CT 06360

Robert D. Snook, Esq.
Assistant Attorney General
55 Elm Street
Hartford CT 06141-0120

A handwritten signature in black ink, appearing to read "Robert D. Snook", written over a horizontal line.