## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

APPLICATION OF DOMINION NUCLEAR CONNECTICUT, INC. TO MODIFY SITING COUNCIL CERTIFICATE (DOCKET NO. 265) FOR THE EXISTING INDEPENDENT SPENT FUEL STORAGE INSTALLATION (DRY STORAGE SYSTEM) AT MILLSTONE [NUCLEAR] POWER STATION, ROPE FERRY ROAD, WATERFORD, CONNECTICUT



**DECEMBER 7, 2012** 

## FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION TO DOMINION NUCLEAR CONNECTICUT, INC. BY INTERVENORS CONNECTICUT COALITION AGAINST MILLSTONE AND NANCY BURTON

- Please identify the portion(s) of the application which address the vulnerability of the Millstone Nuclear Power Station to flooding and other severe weather events and please produce the applicant's complete analysis of the risks and vulnerabilities of the site to such flooding and events.
- 2. Please produce documents and photographs of severe storm events at the site, including hurricane and other severe storm events since 1970 up to and including Superstorm Sandy, and including the New England Hurricane of 1938.
- 3. What risks do flooding and severe storm events pose to the dry cask storage installation at Millstone?
- 4. Please identify all portions of the applicant's application to the Siting Council (Docket 265), including references in the administrative record, which address the issue of vulnerability of the site and the dry cask storage installation to flooding and other consequences of severe weather events.
- 5. What specific measures could be taken to enhance protection to the dry cask storage installation in the event of future flooding and severe storm events?
- 6. Please identify all locations on the Millstone Nuclear Power Plant site which are at elevations above and below historical flooding events.

- 7. What is the elevation of the existing and proposed dry cask concrete bed and components of the dry cask storage facility?
- 8. What is the elevation of Millstone Unit 1?
- 9. What is the elevation of the Millstone 1 spent fuel pool?
- 10. Is the Millstone 1 spent fuel pool located within the containment structure that encloses the Millstone 1 nuclear reactor and, if not, please identify the nature and materials comprising the roof of the Millstone 1 spent fuel pool.
- 11. Please describe the emergency diesel generators designated to provide electricity to the Millstone 1 spent fuel pool in the event of a station blackout, including their location and vulnerability to flooding or incapacitation due to other storm events.
- 12. In what ways is Millstone Unit 1, including its spent fuel pool, similar to the nuclear reactors and their spent fuel pools at the Fukushima nuclear plant in Japan?
- 13. Please produce all analyses of the potential effects of climate change on the vulnerability of the Millstone Nuclear Power Station to severe weather events, including the Millstone 1 spent fuel pool and the dry cask storage installation.
- 14. Please identify the manufacturer and specifications of new dry cask storage components which the application proposes to install, including federal approval for such use and the term(s) of their federal license.
- 15. When does the license of the existing already-filled dry casks at the dry cask storage installation expire?
- 16. Please identify and describe the applicant's plans for disposal of the high-level nuclear waste contained at the Millstone dry cask storage installation once the federal license expires.
- 17. Please identify and document all occasions of error to date in the applicant's transfer of spent fuel to the dry cask storage installation at Millstone, including retrieval from spent fuel pools and eventual installation and please produce documentation submitted to the State of Connecticut and U.S. Nuclear Regulatory Commission concerning such error(s).
- 18. Please state the cost to transfer Millstone 1 spent fuel to dry casks and to install them at the dry cask storage installation and please state the revenue generated by the sale of electricity produced by Millstone 1, 2 and 3 on an annual basis since 1970.

- 19. Please produce documents evidencing federal regulatory approval of higher-burn nuclear fuel at Millstone 2 and describe how the use of such fuel differs from the information previously submitted to the Siting Council in Application 265.
- 20. Please describe how the most recent power uprate at Millstone 3 alters the information submitted to the Siting Council in Application 265.
- 21. Please identify events in the operational history of Millstone 1, 2 and 3 which have occurred since Siting Council approval of Application 265, including unanticipated power spikes, violation of licensing conditions, unplanned shutdowns, notices of violation and fines and penalties issued and imposed by the U.S. Nuclear Regulatory Commission.
- 22. Please describe how the applicant proposes to maintain perimeter security at the Millstone Nuclear Power Station during proposed construction.

23.

- 24. Please describe the circumstances under which the applicant routinely deliberately disabled the perimeter security system during the period of time since September 11, 2001 and the fines and penalties imposed by the U.S. Nuclear Regulatory Commission for such serious breach of its federal licensing conditions.
- 25. Please produce all analyses performed by the applicant regarding the feasibility and cost to transfer spent nuclear fuel from Millstone Unit 1 to the dry cask storage installation.

CONNECTICUT COALITION AGAINST MILLSTONE

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## **CERTIFICATION**

This is to certify that a copy of the foregoing was sent via U.S. Mail, postage prepaid, to the following on December 7, 2012:

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