

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**APPLICATION OF DOMINION NUCLEAR:
CONNECTICUT, INC. TO MODIFY SITING:
COUNCIL CERTIFICATE (DOCKET NO.:
265A) FOR THE EXISTING INDEPENDENT:
SPENT FUEL STORAGE INSTALLATION:
(DRY STORAGE SYSTEM) AT MILLSTONE:
[NUCLEAR] POWER STATION, ROPE :
FERRY ROAD, WATERFORD,; :
CONNECTICUT : JANUARY 28, 2013**

**NOTICE OF INTERVENTION
BY BLACK POINT BEACH CLUB ASSOCIATION**

I, Thomas Kelly, having been duly sworn, do hereby depose as follows:

- 1. I am above the age of eighteen (18) years and I believe in the obligation of an oath.**
- 2. I am Chairman of the Board of Governors of the Black Point Beach Club Association ("Association"), which is composed of 620 owners of property in the Black Point neighborhood of East Lyme, which is on the western shore of Niantic Bay, approximately two miles east of Millstone.**
- 3. I have reviewed Application 265A by Dominion Nuclear Connecticut, Inc. to the Connecticut Siting Council, the subject of the instant proceedings with the Board of Governors at an emergency meeting of the Board of Governors on January 16, 2013. The Board at that meeting adopted a resolution authorizing me to represent the Association with respect to this application and to seek intervener status.**
- 4. The said application involves conduct which has or is unreasonably likely to have the effect of unreasonably polluting, impairing or destroying the public trust in the air, water and other natural resources of the state for the following reasons:**
 - a. The site of the Millstone Nuclear Power Station, including the proposed modified spent nuclear fuel dry cask**

installation, is located directly on the coast of the Long Island Sound and, upon information and belief, is among the most vulnerable of nuclear power plants in the world to effects from major storm effects and climate change, given its proximity to the Long Island Sound.

- b. The proposed modified dry cask storage facility is, at its lowest point, no more than 19 feet in elevation above sea level.**
- c. Recent tidal surges from Super-storm Sandy reached and exceeded 17 feet within coastal areas in the City of New York and may have reached higher surges elsewhere.**
- d. Upon information and belief, worsening and accelerating changes to the climate threaten to create ever more frequent severe storm events such as Super-storm in the vicinity of the Millstone Nuclear Power Station.**
- e. The instant application contains no analysis of the potential effects of climate change on the Millstone Nuclear Power Plant site, nor, more particularly, on the site of the dry cask storage installation.**
- f. Upon information and belief, such effects could be severe, could lead to station blackout, disruption of service and calamity; such events have the strong potential to cause the release and dispersal to the air and water of dangerous quantities of toxic materials, including long-lived carcinogen radioisotopes as well as toxic chemicals.**

WHEREFORE, the Association hereby intervenes in the above-referenced proceedings pursuant to Connecticut General Statutes Section 22a-19.

Black Point Beach Association

**Thomas Kelly
21 Billow Road
Niantic, CT 06357**

VERIFICATION

I, Thomas James Kelly, hereby swear that the information set forth hereinabove is true to the best of my knowledge, information and belief.

SS: Niantic, CT

STATE OF CONNECTICUT
COUNTY OF HARTFORD

Sworn to and subscribed before me this day of January_____, 2013 at _____,
Connecticut.

Notary Public

CERTIFICATION

This is to certify that a copy of the foregoing was sent via electronic mail to the following on January 28, 2013:

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