

**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 : DECEMBER 19, 2012**

**SUPPLEMENT TO PRE-FILED TESTIMONY OF NANCY BURTON**

1. This filing supplements the Pre-Filed Testimony submitted by Nancy Burton on December 12, 2012.
2. The FEMA Rate Map submitted by the applicant to the Siting Council in Application 265 (behind Tab 9, Figure 3-1) has been superseded by a revised version which attains greater accuracy and plots flood zones and wave surge zones significantly closer upon the Millstone site to the ISFSI. The revised map awaits final approval by FEMA. The applicant has not appealed the new delineations. The applicant omitted to inform the Siting Council of this revision and has not provided the Siting Council with an analysis of how the changes affect the application. The intervenors intend to present a copy of the revised map to the Siting Council on December 20, 2012 as an exhibit. The revised map substantially bolsters the intervenors' argument that spent fuel at Millstone should be dry-stored at an alternate, upland location and be appropriately protected with shielding and berms.
3. In 2007 – three years following Siting Council approval of Application 265 – a severe storm originating in the southeast battered the southeastern Millstone shoreline, ripping away a section of the shoreline downslope of and in close proximity to the ISFSI. The applicant obtained an Emergency Authorization from the Connecticut Department of Environmental Protection to reconstruct the shoreline. The project was entitled “Emergency Shoreline Protection” whose purpose – according to application documents – was: “This shoreline protection is to protect a nuclear power station.” The applicant omitted to inform the Siting Council of these facts. This occurrence – exhibiting the vulnerability of the site to severe storm conditions - substantially bolsters the intervenors' argument that spent fuel at Millstone should be dry-stored at an alternate, upland location and be appropriately protected with shielding and berms. The intervenors submit a PDF version of the Emergency Authorization electronically and intend to offer it as an exhibit.
4. The Certificate of Compliance for the NUHOMS dry storage system proposed in this application expires on January 23, 2015.

**CONNECTICUT COALITION AGAINST MILLSTONE**

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**NANCY BURTON**