

PRE-FILED TESTIMONY OF J. DAVID DAKERS

1. Please summarize your professional background and experience.

I am a professional engineer registered in the State of Connecticut and have been working at the Millstone Power Station (“MPS”) since 1989 in various engineering positions. I am a Project Manager for multiple station upgrade projects including the Independent Spent Fuel Storage Installation (“ISFSI”) modification project.

2. What is the purpose of your testimony?

My testimony will address two principal issues. First, I will describe the proposed physical modifications to the ISFSI and the need for those modifications. Second, I will discuss the benefits of installing the concrete pads and aprons for the full build out of 135 Horizontal Storage Modules (HSMs) and why DNC intends to complete all of that work now.

3. Please describe the physical ISFSI modifications proposed as a part of the Docket No. 265A application and the need for these modifications.

As described in the application, DNC has been moving spent fuel to the ISFSI since 2005 and has now loaded a total of 18 HSMs. Following each loading campaign, DNC identified several areas where changes to the certain site features might improve spent fuel loading performance and efficiency. Details regarding these modifications are provided in Section II.E. and shown on project plans behind Tab 7 of the Docket No. 265A Application.

- a. To better accommodate the turning radius of the fuel transport vehicle, we are asking that the area adjacent to the concrete fuel loading apron opposite HSM units 37-67 in the northern-most portion of the ISFSI be widened by 15 feet.
- b. To eliminate challenges presented by the slope of concrete loading apron adjacent to HSM units 1-25, DNC is proposing to eliminate the trench drain from the middle of all future loading aprons. All future aprons will maintain a level grade, thereby eliminating potential alignment challenges during the loading process.
- c. To accommodate the widening of the area adjacent to the loading aprons and the changes to the loading apron grading, DNC has proposed certain minor changes to the ISFSI storm water drainage system. These changes include the relocation of certain catch basins to allow for a more efficient collection of storm water run-off and the rerouting of certain site drainage to the north of the ISFSI, tying into existing storm water structures along the Millstone access road. None of these drainage improvements will require any change to the existing storm water outlet structure known as DSN-011.
- d. Lastly, DNC is seeking Council authorization to allow for the installation of the concrete pads large enough to accommodate a full ISFSI build-out of 135 HSMs.

4. What are the benefits associated with DNC's plan to complete the installation of the concrete pad for the full build-out (135 HSMs) of the ISFSI?

Pursuant to the Condition No. 15 of the Council's May 27, 2004 approval in Docket No. 265, DNC was permitted to complete all subsurface infrastructure work for the full build-out of 135 HSMs, including among other things, site preparation work, backfilling to address structural and seismic considerations, haul road construction, installation of drainage and underground utilities and the relocation of the Protected Area fence to surround the entire 2-acre ISFSI area. DNC was also authorized to build a concrete pad large enough to accommodate 49 HSMs. The existing concrete pad constructed in 2004, can accommodate 20 HSMs. Currently, 19 HSMs have been installed on the existing pad and 18 of those HSMs have been loaded with spent fuel.

As discussed in the Docket No. 265A Application, DNC anticipates that it will fill an additional seven (7) HSM in 2015, so that it can maintain full core reserve in the Unit 2 spent fuel pool. (See Application Section II.F.). DNC intends to expand the existing concrete pad immediately to accommodate the installation of additional HSMs in 2014 and the projected fuel movement in 2015.

To construct the pad extension and other physical ISFSI modifications, DNC will relocate, temporarily, the Protected Area (PA) fence. Once the PA fence is relocated, construction of the physical ISFSI improvements, described in the Docket No. 265A Application, would occur outside the PA. The HSMs currently loaded with spent fuel must remain completely inside the PA, as required by Nuclear Regulatory Commission (NRC) regulations.¹

In addition, DNC projects that a concrete pad large enough for 49 HSMs as referenced in Condition No. 15 of the Council's May 27, 2004 ISFSI approval, would satisfy the need for spent fuel loading until approximately 2021. DNC typically uses a 3 to 5 year planning horizon for major projects (such as modification to the ISFSI) meaning that planning for an additional pad expansion beyond the 49 HSMs already approved could begin as early as 2016. From a project management perspective it simply makes more sense to complete all of the concrete pad construction work now.

In order to avoid having to relocate the PA fence every time it needs to expand the concrete pad for the storage of more spent fuel, and to provide for fuel loading accommodations for a more reasonable timeframe. DNC is asking for Council authorization to complete all of the remaining ISFSI pads during this next phase of construction. DNC would complete this pad construction work and relocate the PA fence back to its existing location, surrounding the entire ISFSI area, prior to the 2015 spent fuel loading campaign. The goal here is simple. Move the PA fence only once and provide a longer horizon for fuel accommodations by completing the remaining concrete pad installation and related physical ISFSI improvements.

¹ Certain limited pad construction activity would need to occur inside the PA before the fence is temporarily relocated. This activity would be in the vicinity of HSMs 21-27 and 68-71. (See Drawing 3 behind Tab 7 of the Docket No. 265A Application). All remaining pad construction activity would occur outside the PA.

5. **Would DNC accelerate its fuel movement activity once all of the ISFSI concrete pad construction has been completed?**

No. As discussed at length in the Docket No. 265A Application, DNC will continue to move spent fuel from the spent fuel pools to the ISFSI only as required by plant operations and spent fuel management strategies.

6. **Does this conclude your testimony?**

Yes.

Subscribed and sworn to this

12th day of December 2012,
before me



Commissioner of the Superior Court
Notary Public

My commission expires: _____



J. David Dakers

CERTIFICATION

This is to certify that on the 13th day of December, 2012, a copy of the foregoing was sent, electronic mail, to the following:

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