

**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 13, 2012

REQUEST FOR PARTY-STATUS INTERVENTION BY NANCY BURTON

Nancy Burton herewith requests party intervention status in these proceedings and in support of this intervention declares as follows:

1. My name is Nancy Burton. I reside at 147 Cross Highway, Redding Ridge, Connecticut. I also own and seasonally reside upon real property located at 6 Allyns Alley in Mystic, Connecticut.
2. I am substantially and specifically affected by the proceeding insofar as the property I own and upon which I seasonally reside in Mystic, Connecticut, is located approximately ten (10) miles downwind of the Millstone Nuclear Power Station ("Millstone"), the subject of this application. I have previously been found to have standing to intervene in U.S. Nuclear Regulatory Commission proceedings concerning Millstone given my ownership of such property and its proximity to Millstone. Furthermore, I am subject to potential mandatory evacuation orders and martial law and personal harm in the event of a serious accident at Millstone, including at the proposed storage facility. The application has potential to release harmful and toxic materials likely to be readily dispersed to Mystic, Connecticut.
3. I contend that the instant application is incomplete and defective in lacking analysis of the potential effects of severe flooding and climate change on the facility; in relying upon critical materials such as concrete which is innately highly susceptible to corrosion and degradation, particularly in a low-lying coastal shoreline location; in siting dry storage of high-level high burn-up spent nuclear fuel in the absence of analysis of its suitability for the site; in failing to demonstrate the application will enhance reliability of the grid.
4. Accordingly, the application should be denied without prejudice to submission of an application which overcomes said defects and deficiencies. In the alternative, the Siting Council should require the

applicant to select an alternate, upland location for this activity, together with detailed plans for appropriate berming and shielding.

5. Evidence to be submitted will correspond to the evidence submitted on these subjects by Nancy Burton in her capacity as an environmental intervenor. See "Request by Connecticut Coalition Against Millstone and Nancy Burton to Siting Council to Take Administrative Notice" and "Connecticut Coalition Against Millstone and Nancy Burton Witness and Exhibit List," being filed contemporaneously herewith.

NANCY BURTON



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CERTIFICATION

This is to certify that a copy of the foregoing was sent via U.S. Mail, postage pre-paid, to the following on December 13, 2012:

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