

Melanie A. Bachman, Esq. Executive Director/Staff Attorney Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Petition No. 1586 - Dominion Energy Nuclear Connecticut, Inc. – Petition for a Declaratory Ruling on the Need to Obtain a New or Modify an Existing Siting Council Certificate to Modify the Boundary of the Site at the Millstone Power Station, Waterford, Connecticut

Interrogatory

Attorney Bachman and Dominion Representatives:

On behalf of the citizens of the Town of Waterford, I am requesting these questions be answered by DENC. Thank you for your time.

Question 1:

Your attorney that represents DENC has stated that they plan to purchase the Data Centers. In a previous Interrogatory DENC representatives have said that you wont be purchasing the Data Centers. Will Dominion be purchasing the Data Centers that will be built on your property? What has changed since the previous DENC representative stated that you were?

Question 2:

How many more Data Centers does NE Edge plan to build on Dominions Property?

Question 3:

In question three of the Siting councils inquiry, you stated that, "It is not anticipated that prior USNRC approval will be required as it is expected that the changes will have minimal to no impact on safety." Can you provide evidence to support this claim? Please provide more details into what discussions you have had with the USNRC to suggest that there will be no impact on safety.

Question 4:

If DENC plans to use the remaining 204 acres of land for storage, where will these storage facilities be? There will be thousands of Construction workers that will have access to this area for five years (or more, if more Data Centers are built). How will you ensure that the storage areas will be protected from outside access?

Question 5:

In question fifteen of the Siting Council, you have stated "No" in response to "Would operation of the data center and its switchyard have any potential adverse impact on any of DENC's obligations to federal, state or regional entities under any permit, contract or license (ex. reserve margin, operating reserves, maintenance)? If so, how will DENC address these potential impacts?"

Please elaborate on how you came to this conclusion and provide supporting documentation to prove that indeed there would be "No" impact.

Question 6:

Please elaborate more on why you answered “No” in question number sixteen of the Siting Council. Please provide proof that reliability will not be impacted during summer or winter. Have you done any testing or analysis to prove that this indeed is the case?

Question 7:

In question seventeen by the Siting Council, you stated that NE Edge is solely responsible for the fire emergency plan with the town. With so many Data Center fires across the US and other Countries, that last for long periods of time and are very detrimental to the surrounding areas they burn, shouldn't Dominion, only a few thousand feet away, have to create your own emergency Fire plan as well, considering all of the risk associated?

Question 8:

In many of your answers to the Siting Council, you stated that there will be “no adverse impact” to safety or the surrounding area. How did you come to that conclusion? If there are no plans submitted to the town or any other regulatory agencies, how have you been able to discern that there will be no impact? Has there been any impact studies done to prove that there will be no impact?

Question 9:

Please provide documentation to support your claim that there will be no impact on the Visual Character of the surrounding area. The Buildings proposed in the Host agreement are totaling 1.5 Million Square feet, no windows, and will be over 70 feet tall. The height of the building will almost double the average tree in the area, and the buildings themselves will be larger than any other building in this town, or any town in the area. How can there be no visual impact from that?

Question 10:

You stated that the 204 acres of land will remain open space, is this an absolute certainty? Will there be any more Data Centers Built on any of this open space in the future? Will the DENC be building any more reactors, power generating facilities, or storage units on the 204 acres?

Question 11:

The company plans to lease for the next 30 years, where will you build more storage pools or storage areas for dry cask storage of spent uranium? How much more space do your storage pools have? Considering there has been spent Uranium rods stored in these facilities since the 1970's, it is relevant to be concerned that there isn't enough space for another 30 years of storage.

Question 12:

If there is a fire or a major event at the Data Centers, how will you prevent the spent uranium that is stored on your facility grounds from being implicated or damaged? How many feet away are the spent uranium storage facilities?

Question 13:

Will you be relocating any spent uranium so that the Data Centers can be built? In other words, is any spent Uranium currently being stored in or near the proposed Data Center sites?

Question 14:

Who will be building the switchyard/electric interconnection facilities that will supply the power to the Data Centers? Will DENC be overseeing this connection? Who will be managing this area and doing maintenance work on the connection area, checking the facility for issues, and making repairs?