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October 23, 2023

Via Federal Express and Electronic Mail

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**

Responses to Interrogatories from Intervenor, Michelle Neri

Dear Attorney Bachman:

On behalf of Dominion Energy Nuclear Connecticut, Inc. (“Petitioner”), enclosed please find the original and fifteen (15) copies of the Petitioner’s Responses to the Interrogatories from Intervenor, Michelle Neri in Petition No. 1586. Electronic copies of these responses were also sent to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia
Enclosure

28084491-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF DOMINION ENERGY	:	PETITION NO. 1586
NUCLEAR CONNECTICUT, INC. 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	:	OCTOBER 23, 2023

**RESPONSES OF DOMINION ENERGY NUCLEAR CONNECTICUT, INC
TO INTERROGATORIES FROM INTERVENOR MICHELLE NERI**

On October 12, 2023, the Intervenor, Michelle Neri issued Interrogatories to Dominion Energy Nuclear Connecticut, Inc. (“Petitioner”, “Dominion” or “DENC”), relating to Petition No. 1586. Below are the Petitioner’s responses.

Question No. 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 won’t 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?

Response

See the DENC response to Council Interrogatory (Set Two) No. 32.

Question No. 2

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

Response

The scope of the proposed NE Edge data center project is described at length in Petition No. 1586 and related interrogatory responses and will include two data center buildings on two separate leased parcels (Lease Area 1 and Lease Area 2) and one electrical substation on a third leased parcel (Lease Area 3).

Question No. 3

In question three of the Siting Council's 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.

Response

See DENC responses to Council Interrogatory Nos. 3, 28, 29, 40, 43 and 46 providing information on the MPS Updated Final Safety Analysis Report ("UFSAR"). All communications between DENC and the USNRC are confidential and not subject to public disclosure.

Question No. 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?

Response

The reference to 204 acres, in response to Council Interrogatory No. 27, refers to the amount of open space that will remain following development of the data center. No reference was made to any future use of this open space area.

Question No. 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.

Response

See DENC’s response to Question No. 3 above.

The scope of the NE Edge data center project is limited to that described in Petition No. 1586. Future planned uses of land at MPS are outside the scope of this proceeding.

Question No. 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?

Response

See DENC’s responses to Council Interrogatory Nos. 4 and 12.

Question No. 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?

Response

See DENC's responses to Interrogatories No. 3 above.

Question No. 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?

Response

As discussed at length in the Petition and in numerous responses to Council interrogatories, the proposed data center, if approved by the Town of Waterford, would be constructed north of the Amtrak rail line and separated, an adequate distance, from power generation and related activities in the MPS Protected Area to the south. *See also*, DENC's response to Council Questions Nos. 38 and 48.

Question No. 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?

Response

See DENC response to Council Interrogatory No. 26. The visual impacts of the proposed NE Edge data center will be evaluated as a part of the Town's zoning approval process.

Question No. 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?

Response

DENC objects to this question as it requests information that is outside the scope of the Petition No. 1586 proceeding.

Question No. 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.

Response

DENC objects to this question as it requests information that is outside the scope of the Petition No. 1586 proceeding.

Question No.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?

Response

See DENC's response to Council Interrogatories Nos. 28, 29, 40, 43 and 46 regarding DENC's obligations to update it existing FSAR for MPS.

Question No. 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?

Response

The current uses of Lease Areas 1, 2 and 3 are described in the Petition and include vacant and undeveloped land, used periodically for equipment storage, vacant wooded areas and the existing sand and salt shed.

Question No. 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?

Response

As described in the Petition, NE Edge will be responsible for the development and interconnection of the switchyard to the NE Edge data center. DENC will work with NE Edge on the interconnection between the data center switchyard and MPS Units 2 and 3.

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of October 2023, a copy of the foregoing was sent,
via electronic mail, to:

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