

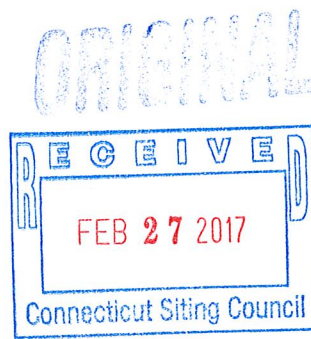
Dominion Nuclear Connecticut, Inc.  
Rope Ferry Rd., Waterford, CT 06385  
Mailing Address: P.O. Box 128  
Waterford, CT 06385  
dom.com



**Dominion**<sup>®</sup>

Serial No.: RA-17-004  
MPS NSSL/GJC

Robert Stein, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051



**FEB 23 2017**

**Re: Petition No. 1233 - Dominion Nuclear Connecticut (DNC), Inc. Millstone Power Station - Completion of Construction of On-site Horizontal Storage Module Fabrication Area**

Dear Mr. Stein:

On June 9, 2016, Millstone Power Station (MPS) filed a petition for declaratory ruling (designated as Petition No. 1233) pursuant to R.C.S.A. §16-50j-38 and §16-50j-39 with the Connecticut Siting Council (the Council) for construction of an on-site horizontal storage module fabrication area (see Enclosure 1).

On July 22, 2016 the Council approved DNC's petition to construct the on-site horizontal storage module fabrication area with conditions and requested notification in writing when construction is completed (see Enclosure 2).

This letter serves to notify the Council that construction of the new on-site horizontal storage module fabrication area was completed on January 12, 2017. If you have any questions, please feel free to contact Mr. Thomas J. Bransfield at (860) 447-1791, extension 6000.

Sincerely,

  
John Daugherty  
Site Vice President – Millstone

Enclosures: 2

1. Letter SN RA-16-021, FROM: John Daugherty, Site Vice President, TO: Robert Stein, Chairman Connecticut Siting Council, SUBJECT: Petition for Declaratory Ruling – Installation Having No Substantial Adverse Environmental Effect, Dated June 9, 2016
  2. Letter FROM: Robert Stein, Chairman Connecticut Siting Council, TO: John Daugherty, Site Vice President, SUBJECT: Petition No. 1233 – Dominion Nuclear Connecticut, Inc. petition for declaratory ruling that neither a new Certificate of Environmental Compatibility and Public Need (Certificate) nor a modification of the existing Certificate is required for the proposed construction, maintenance and operation of an on-site horizontal storage module fabrication area at the Millstone Power Station, Rope Ferry Road, Waterford, Connecticut, Dated: July 22, 2016.
- cc: Daniel Steward, First Selectman, Town of Waterford  
Jeffry A. Langan  
Thomas J. Bransfield  
J. David Dakers  
L.M. Cuoco, Esq.

**ENCLOSURE 1**

**LETTER SN RA-16-021,  
DATED: JUNE 9, 2016.**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**



Dominion Nuclear Connecticut, Inc.  
Rope Ferry Rd., Waterford, CT 06385  
Mailing Address: P.O. Box 128  
Waterford, CT 06385  
dom.com

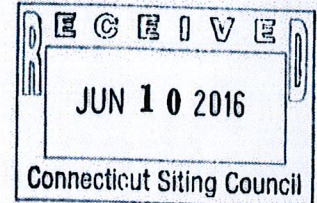
# ENCLOSURE 1



JUN 09 2016

Serial No. RA-16-021  
MPS NSSL/GJC R0

Robert Stein, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051



**Re: Petition for Declaratory Ruling - Installation Having No Substantial Adverse Environmental Effect**

Dear Chairman Stein:

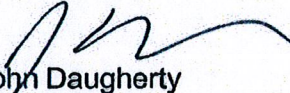
Enclosed please find the original and fifteen (15) copies of a Petition for Declaratory Ruling related to the installation of a horizontal storage module fabrication area at Millstone Power Station in Waterford, Connecticut.

Also enclosed is a check in the amount of \$625.00 for the required filing fee.

If you have any questions regarding the petition, please feel free to contact Thomas Bransfield at (860) 447-1791, extension 6000.

Thank you in advance for your assistance and cooperation in this matter.

Sincerely,

  
John Daugherty  
Site Vice President — Millstone

Enclosures: Petition and exhibits  
Filing Fee

cc (with enclosures):  
Daniel Steward, First Selectman, Town of Waterford  
Abby Piersall, Planning Director, Town of Waterford  
Lillian M. Cuoco, Esq.  
Thomas J. Bransfield  
Chip Combs  
Steven G Horn  
J. David Dakers



Serial No.  
MPS NSSL/GJC

RA-16-020  
R0

**PETITION FOR DECLARATORY RULING:  
INSTALLATION HAVING NO SUBSTANTIAL ENVIRONMENTAL EFFECT**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
: :  
A PETITION OF DOMINION NUCLEAR : PETITION NO. \_\_\_\_  
CONNECTICUT, INC. FOR A : :  
DECLARATORY RULING ON THE NEED : :  
TO OBTAIN A NEW OR MODIFY AN : :  
EXISTING SITING COUNCIL : :  
CERTIFICATE FOR CONSTRUCTION OF : :  
A HORIZONTAL STORAGE MODULE : :  
FABRICATION AREA AT THE : June 9, 2016  
MILLSTONE POWER STATION,  
WATERFORD, CONNECTICUT

PETITION FOR A DECLARATORY RULING:  
INSTALLATION HAVING NO  
SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT

I. Introduction

Pursuant to Sections 16-50j-38 and 16-50j-39 of the Regulations of Connecticut State Agencies, Dominion Nuclear Connecticut, Inc. (DNC) hereby petitions the Connecticut Siting Council (Council) for a declaratory ruling that neither a new Certificate of Environmental Compatibility and Public Need (Certificate) nor a modification of the existing Certificate (Docket No. 265 and 265A) is required under Section 16-50k(a) of the Connecticut General Statutes (C.G.S.) for the construction of an on-site horizontal storage module (HSM) fabrication area at the Millstone Power Station (MPS) in Waterford, Connecticut.

II. Background

DNC owns and operates MPS<sup>1</sup> pursuant to licenses issued by the U.S. Nuclear

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<sup>1</sup> DNC owns MPS Units 1 and 2 (MPS1 and MPS2) in their entirety and owns 93.47% of MPS Unit 3 (MPS3). The remaining interest in MPS3 is owned by the Massachusetts Municipal Wholesale Electric Company (4.8%) and Green Mountain Power Corporation (1.73%).

Regulatory Commission (NRC). On May 27, 2004, the Council approved the Docket No. 265 Certificate to permit DNC to construct, operate and maintain an Independent Spent Fuel Storage Installation (ISFSI) at MPS. On October 31, 2012, DNC filed an application with the Council to modify and amend the Docket No. 265 Certificate, in particular, Condition No. 15 to allow DNC to construct a concrete pad large enough to accommodate 135 HSMs for the full build-out of the ISFSI (Docket No. 265A). The Council approved the Docket 265A application on May 2, 2013. During the course of the Docket 265A proceeding, DNC informed the Council that it was considering the fabrication of future HSMs on-site at MPS and would submit appropriate information to the Council if it intends to pursue on-site fabrication.<sup>2</sup> This Petition along with the attached exhibits support DNC's request for a declaratory ruling confirming that the proposed establishment of an HSM fabrication area at MPS will not have a significant adverse environmental effect.

### III. Installation Plan

The proposed HSM fabrication area is an approximately 2.5 acre area, located south of the Amtrak rail line, north of the ISFSI, and northwest of the existing MPS switchyard (HSM fabrication area). See Exhibit 1 – MPS Site Plan, with a notation identifying the location of the HSM Fabrication Area. The HSM fabrication area is outside of the MPS Protected Area but within the owner controlled area of the plant and is currently used for outside equipment storage. See Exhibit 2 – HSM Fabrication Area – Proposed Location. The HSM fabrication area, maintains a generally level grade with a gravel surface and some overgrowth. Minor grading of the HSM fabrication area is required to accommodate the proposed site improvements. See Exhibit 3 – Plan Sheet C3.0 – Site Plan.

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<sup>2</sup> As discussed in Docket No. 265A, Finding of Fact No. 42, HSMs are currently manufactured by Transnuclear and shipped from Virginia, by rail, “creating “delivery time issues.”



In the HSM fabrication area, DNC will install a fifteen (15) inch thick concrete pad with dimensions of sixty (60) feet by two hundred and fifty (250) feet. DNC has determined that existing soils conditions in the area surrounding the concrete pad are likely unsuitable for the heavy equipment use planned as part of the HSM fabrication process. These existing soils will be removed to a minimum depth of approximately fifteen (15) inches and replaced with more suitable compacted structural fill material as needed to support HSM fabrication operations. See Exhibit 3 – Plan Sheet C5.0. – Proposed Conditions-Details.

The HSM fabrication area has also been the subject of previous remediation and construction debris removal activities, contains monitoring wells for post remediation sampling, and continues to be monitored by the Connecticut Department of Energy and Environmental Protection (DEEP) as part of the MPS Property Transfer Program.<sup>3</sup>

Prior to construction activities, the areas to be disturbed will be sampled under the guidance of a Licensed Environmental Professional to determine if removed soils/construction debris meets the DEEP Remediation Standard Regulations as appropriate for reuse. Material appropriate for reuse will be relocated to the on-site soil disposal area depicted on Exhibit 3 – Plan Sheet C4.0 – Proposed Soil Disposal Location. Material not suitable for reuse will be removed from MPS and disposed in accordance with applicable regulations. DNC will maintain the ability to monitor ground water in accordance with its commitments under the Property Transfer Program after completion of the HSM fabrication area improvements.

No on-site concrete batch plant is planned. Concrete used to construct the HSMs will be trucked to MPS and placed in the form work for the modules on the proposed concrete pad. Other portions of the 2.5 acre HSM fabrication area will be used for the staging of fabrication

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<sup>3</sup> Annual Review of Investigation and Remediation Activities, Property Transfer Program, Millstone Power Station. – Dominion Electric Environmental Services update to Connecticut Department of Energy and Environmental Protection (May 13, 2014).

material and the storage of the completed module sections and forms. No buildings, structures or weather protection is planned or necessary for the HSM fabrication area once the “at grade” concrete pad is constructed.

Storm water run-off from the new 60’ by 250’ concrete pad will be minimal and will infiltrate through the porous gravel surface treatment around the pad. During construction of the HSM fabrication area additional measures, including a perimeter straw bale/silt fence barrier berm, and grass strips on east and west sides of the HSM fabrication area will be installed to control and filter any sediment in the storm water run-off. Intermediate berms will be placed in the construction area as needed by the sequence of construction and as directed by project engineers monitoring storm water controls. See Exhibit 3 – Plan Sheet C2.0 – Sediment and Erosion Control/Demolition Plan. Dust control will be provided by water trucks misting the area during construction.

#### IV. Local Input

On September 16, 2015, DNC met with Town of Waterford officials, and discussed the plans to fabricate HSMs on-site at MPS. Following that meeting, the Town asked for some additional information on the project. DNC met with the Town and discussed the additional information on November 17, 2015. DNC responded to the request for additional information on April 25, 2016. On May 9, 2016, the Town of Waterford Planning and Zoning Commission granted permanent location approval for the HSM fabrication area improvements and determined that the project is “consistent with the Planning and Zoning Commission’s order of May 20, 1985, its management guidelines and approved ISFSI plans.” In addition, the Waterford Conservation Commission determined that the HSM fabrication project would not involve any regulated wetlands activity and no impact on coastal resources is anticipated. The Town’s May 17, 2016 letter is attached as Exhibit 4.

V. The Proposed Establishment of an HSM Fabrication Area Does Not Constitute A Modification And/Or Will Not Have A Substantial Adverse Environmental Effect

The Public Utility Environmental Standards Act (the Act), C.G.S. § 16-50g et seq., provides for environmentally compatible development of electric generating facilities in the State to avoid “a significant impact on the environment and ecology of the State of Connecticut.” C.G.S. § 16-50g. To achieve these goals, the Act established the Council, and requires the issuance of a Certificate for the “construction” or “modification” of electric generating facilities “that may, as determined by the council, have a substantial adverse environmental effect.” C.G.S. § 16-50k(a).

The proposed installation of the HSM fabrication area described above will not involve a significant alteration in the physical or environmental characteristics of the MPS site. The proposed location of the HSM fabrication area is previously disturbed and is currently used for equipment storage. The closest wetland area is located approximately 100 feet to the west of the HSM Fabrication Area. This wetland area will not be impacted by the site development activity described in this Petition. Access to the HSM fabrication area would extend from the main MPS access road, located approximately 500 feet to the south over an existing drive. The physical attributes of the HSM fabrication area will not be altered, as no substantial clearing or grading is required. Proper soil erosion and sedimentation controls will be installed prior to commencement of construction activity. See Exhibit 3 – Plan Sheet C2.0 – Sediment and Erosion Control/Demolition Plan.

Based on the description of the proposed activity above, DNC respectfully submits that the proposed installation of the HSM fabrication area improvements at MPS does not constitute a “modification” of the existing generating facility as defined in C.G.S. § 16-50i(d) and therefore does not require the issuance of a Certificate. If, however the Council were to deem the




proposed improvements a “modification,” such a modification would not have a “substantial adverse environmental effect” and therefore would likewise not require the issuance of a Certificate.

IVI. Conclusion

Based on the foregoing, DNC respectfully requests that the Council issue a determination in the form of a declaratory ruling that the proposed installation of the HSM fabrication area at MPS does not constitute a modification and/or will not have a substantial adverse environmental effect and does not require the issuance of a Certificate pursuant to § 16-50k(a) of the Connecticut General Statutes.

Respectfully submitted,

By:   
\_\_\_\_\_  
John Daugherty  
Site Vice President – Millstone  
Dominion Nuclear Connecticut, Inc.

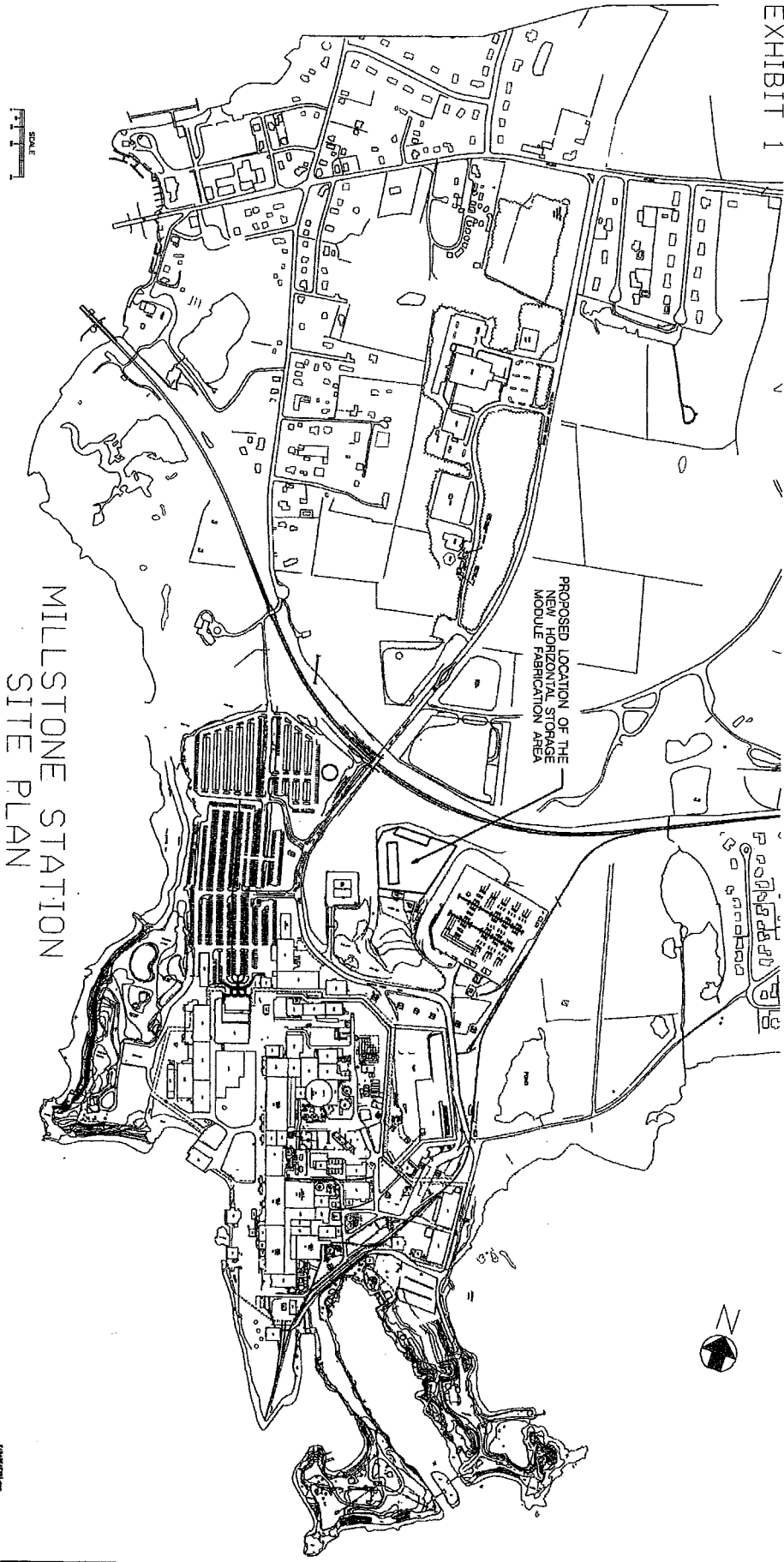
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MPS NSSL/GJC

RA-16-020  
R0

**EXHIBIT 1**

**MPS SITE PLAN OVERVIEW  
IDENTIFYING THE LOCATION OF THE HORIZONTAL  
STORAGE MODULE FABRICATION AREA**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**



MILLSTONE STATION  
SITE PLAN

1/1/1980



Serial No.  
MPS NSSL/GJC

RA-16-020  
R0

**EXHIBIT 2**

**GENERAL MPS SITE PLAN  
IDENTIFYING THE AREA WHERE THE HORIZONTAL  
STORAGE MODULE FABRICATION AREA IS TO BE PLACED**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**



Serial No.  
MPS NSSL/GJC

RA-16-020  
R0

**EXHIBIT 3**

**PLANS FOR THE HORIZONTAL STORAGE MODULE FABRICATION AREA**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**





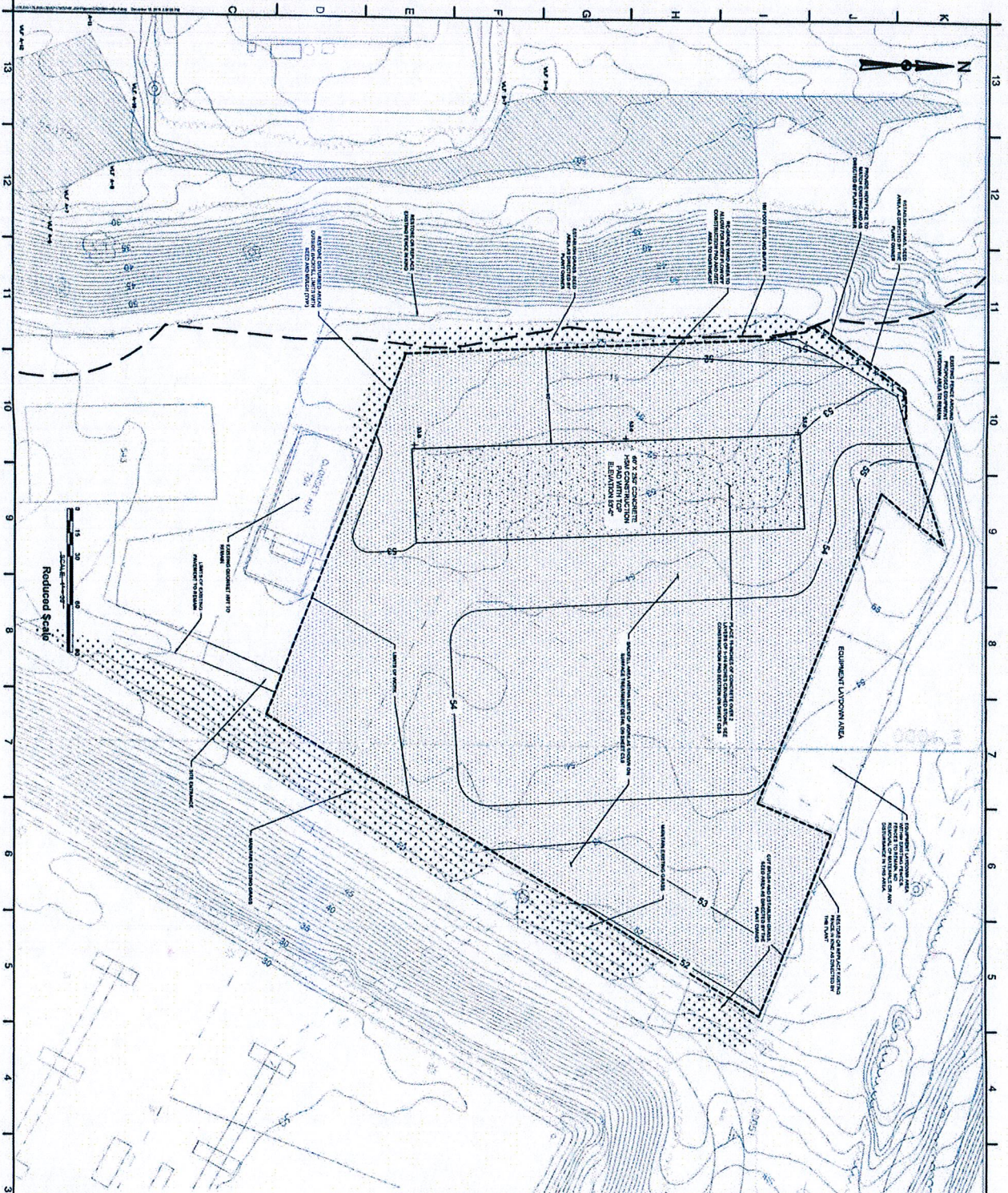












Reduced Scale  
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**EXHIBIT 3**

THIS DRAWING IS A PART OF THE MILLSTONE POWER PLANT HSM CONSTRUCTION AREA. IT IS THE PROPERTY OF GZA GEOENVIRONMENTAL, INC. AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF GZA GEOENVIRONMENTAL, INC. THE USER OF THIS DRAWING SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND FOR VERIFYING THE ACCURACY OF ALL DATA AND INFORMATION PROVIDED TO GZA GEOENVIRONMENTAL, INC. GZA GEOENVIRONMENTAL, INC. SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT AND SHALL BE AT THE USER'S SERVICE FOR ANY QUESTIONS OR CONCERNS.

**LEGEND**

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1. REFER TO SHEET 3 FOR SECTION WITHIN LIMITS OF WORK.

**PROPOSED CONDITIONS - SITE PLAN**  
**MILLSTONE POWER PLANT**  
**HSM CONSTRUCTION AREA**  
 WATERFORD, CT

**GZA** GeoEnvironmental, Inc.  
*Proactive by Design*

240 Westchester Avenue  
 Westchester, NY 10594  
 Tel: 914-234-2000  
 Fax: 914-234-2001  
 www.gza.com

DATE: 01/17/25  
 DRAWN BY: [Signature]  
 CHECKED BY: [Signature]  
 APPROVED BY: [Signature]

PROJECT NO.	01.17257.00
DATE	01/17/25
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Serial No.  
MPS NSSL/GJC

RA-16-020  
R0

**EXHIBIT 4**

**TOWN OF WATERFORD LETTER DATED MAY17, 2016  
FROM: ABBY Y. PIERSALL, DIRECTOR OF PLANNING  
TO: STEVEN V. HEARD, MANAGER, NUCLEAR SITE SERVICES  
MILLSTONE POWER STATION WITH ATTACHMENT**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**

FIFTEEN ROPE FERRY ROAD



WATERFORD, CT 06385-2886

May 17, 2016

Steven V. Heard  
Manager, Nuclear Site Services  
Millstone Power Station  
314 Rope Ferry Road  
Waterford, CT 06385

RE: Millstone Power Station: Proposed HSM Construction Area

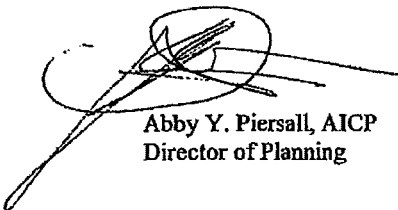
Dear Mr. Heard:

This letter is in response to your proposal dated April 25, 2016 for the installation of the HSM Construction Area at Millstone Station, Waterford, CT. Based on plans dated December 18, 2015 prepared by GZA GeoEnvironmental, Inc., and responses to Waterford Planning Department's October 15, 2015 memorandum, it is found that the proposed HSM Construction Area is consistent with the Planning and Zoning Commission's Order of May 20, 1985, its management guidelines and approved ISFSI plans.

The Waterford Planning and Zoning Commission reviewed this request at their regular meeting of May 9, 2016 and supported staff findings of consistency with the 1985 Order. This correspondence also references the May 12, 2016 memorandum issued by Maureen FitzGerald, Environmental Planner, and attached herein. The Conservation Commission determined that the project as presented does not involve regulated inland wetland activity. No impact on coastal resources is anticipated.

This approval does not waive any other permit or site management requirements which would follow a Siting Council decision. Erosion and Sediment controls shall be maintained throughout the duration of the project. Please contact me with any questions or if additional information is required.

Sincerely,



Abby Y. Piersall, AICP  
Director of Planning

Attachments: May 12, 2016 Memorandum from Maureen Fitzgerald, Environmental Planner

FIFTEEN ROPE FERRY ROAD



WATERFORD, CT 06385-2886

Date: May 12, 2016

To: Abby Piersall, Planning Director

From: Maureen FitzGerald, Environmental Planner

Re: Dominion Nuclear Connecticut, Inc.  
Request for Permanent Location Approval  
Proposed HSM Construction Area

I have reviewed the revised plan set for the proposed Millstone Power Plant HSM construction area prepared by GZA GeoEnvironmental, Inc. dated December 18, 2015. A grassed filter strip has been incorporated at the edge of the proposed construction area in response to department review comments. The filter strip is intended to reduce run-off velocity and filter suspended sediments from stormwater run-off prior to discharge to the down-gradient forested wetland area.

Portions of the grassed filter strip and perimeter fence replacement occur within the 100 ft. upland review area of the wetland located west and downgradient of the location. The Waterford Conservation Commission has reviewed the proposed HSM Construction Area plans and determined the project does not involve regulated inland wetland activity. This determination is based on the following considerations:

1. The seeding and maintenance of the grassed filter strip within the upland review area mitigates potential impacts of site run-off to the receiving hillside and down-gradient wetland.
2. Disturbance to the existing vegetation for replacement of the security fence is temporary and will not involve fill or grading activity.

Sincerely,



Maureen FitzGerald  
Environmental Planner

cc: Waterford Conservation Commission

**ENCLOSURE 2**

**CT SITING COUNCIL LETTER  
DATED: JULY 22, 2016.**

**MILLSTONE POWER STATION  
DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**





## STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)[www.ct.gov/csc](http://www.ct.gov/csc)

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

July 22, 2016

John Daugherty  
Site Vice President-Millstone  
Dominion Nuclear Connecticut, Inc.  
Rope Ferry Road  
Waterford, CT 06385

RE: **PETITION NO. 1233** - Dominion Nuclear Connecticut, Inc. petition for a declaratory ruling that neither a new Certificate of Environmental Compatibility and Public Need (Certificate) nor a modification of the existing Certificate is required for the proposed construction, maintenance and operation of an on-site horizontal storage module fabrication area at the Millstone Power Station, Rope Ferry Road, Waterford, Connecticut.

Dear Mr. Daugherty:

At a public meeting held on July 21, 2016, the Connecticut Siting Council (Council) considered and ruled that the above-referenced proposal would not have a substantial adverse environmental effect, and pursuant to Connecticut General Statutes § 16-50k, would not require a Certificate of Environmental Compatibility and Public Need, with the following conditions:

1. Use of off-road construction equipment that meets the latest EPA or California Air Resources Board standards, or in the alternative, equipment with the best available controls on diesel emissions, including, but not limited to, retrofitting with diesel oxidation catalysts, particulate filters and use of ultra-low sulfur fuel;
2. Compliance with the provisions of Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies that limit the idling of mobile sources to 3 minutes;
3. Approval of any minor project changes be delegated to Council staff;
4. Unless otherwise approved by the Council, if the facility authorized herein is not fully constructed within three years from the date of the mailing of the Council's decision, this decision shall be void, and the facility owner/operator shall dismantle the facility and remove all associated equipment or reapply for any continued or new use to the Council before any such use is made. The time between the filing and resolution of any appeals of the Council's decision shall not be counted in calculating this deadline. Authority to monitor and modify this schedule, as necessary, is delegated to the Executive Director. The facility owner/operator shall provide written notice to the Executive Director of any schedule changes as soon as is practicable;
5. Any request for extension of the time period to fully construct the facility shall be filed with the Council not later than 60 days prior to the expiration date of this decision and shall be served on all parties and intervenors, if applicable, and the Town of Waterford;

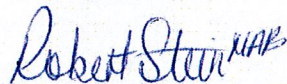


6. Within 45 days after completion of construction, the Council shall be notified in writing that construction has been completed;
7. The facility owner/operator shall remit timely payments associated with annual assessments and invoices submitted by the Council for expenses attributable to the facility under Conn. Gen. Stat. §16-50v;
8. This Declaratory Ruling may be transferred, provided the facility owner/operator/transferor is current with payments to the Council for annual assessments and invoices under Conn. Gen. Stat. §16-50v and the transferee provides written confirmation that the transferee agrees to comply with the terms, limitations and conditions contained in the Declaratory Ruling, including timely payments to the Council for annual assessments and invoices under Conn. Gen. Stat. §16-50v; and
9. If the facility owner/operator is a wholly owned subsidiary of a corporation or other entity and is sold/transferred to another corporation or other entity, the Council shall be notified of such sale and/or transfer and of any change in contact information for the individual or representative responsible for management and operations of the facility within 30 days of the sale and/or transfer.

This decision is under the exclusive jurisdiction of the Council and is not applicable to any other modification or construction. All work is to be implemented as specified in the petition dated June 9, 2016.

Enclosed for your information is a copy of the staff report on this project.

Very truly yours,



Robert Stein  
Chairman

RS/RDM/lm

Enclosure: Staff Report dated July 21, 2016

- c: The Honorable Daniel M. Steward, First Selectman, Town of Waterford  
Abby Piersall, AICP, Planning Director, Town of Waterford  
Mark A. Wujtewicz, Planner, Town of Waterford  
Kenneth C. Baldwin, Esq., Robinson & Cole LLP





# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### Petition No. 1233

**Dominion Nuclear Connecticut, Inc.**

**Millstone Power Station – Storage Module Fabrication Area**

**Waterford, Connecticut**

**Staff Report**

**July 21, 2016**

### Introduction

On June 10, 2016, the Connecticut Siting Council (Council) received a petition (Petition) from Dominion Nuclear Connecticut, Inc. (DNC) for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need (Certificate) is required for the construction of a horizontal storage module (HSM) fabrication area at the Millstone Power Station (MPS) in Waterford, Connecticut. On May 2, 2013, under Docket 265A, the Council approved an amendment to the Docket 265 Certificate to allow DNC to install a concrete pad to house up to 135 HSMs within the Independent Spent Fuel Storage Installation (ISFSI) located within a secured area on the MPS property. The ISFSI was approved by the Council on May 27, 2004 in Docket 265. During the Docket 265A proceeding, DNC indicated it may elect to install a HSM fabrication area on the MPS property rather than having the HSMs transported by rail from a fabrication facility in Virginia to avoid potential delivery delays and would file a Petition with the Council if DNC pursued on-site fabrication.

### Proposed Project

The proposed 2.5-acre fabrication site is within a controlled access area of the MPS property and is adjacent to an electrical substation, other Millstone infrastructure and an Amtrak rail line that traverses the MPS property. The proposed site is currently cleared and is used for exterior equipment storage.

At the proposed site, DNC would remove existing fencing and equipment within the storage area, except for a section at the north end. DNC would remove soil within the area to a depth of 15 inches. The generally level site would be graded as necessary and compacted to heavy equipment standards. DNC would install a 60-foot wide by 250-foot long by 15 inches thick concrete pad on the west side of the site.

The new pad would be used to support HSM fabrication molds that would cure concrete into HSM sections for later assembly. Concrete used in the mold process would be trucked into the MPS property from an off-property location. Other areas of the proposed site would be used for staging and storage of the forms and completed sections of the modules. The proposed site would be enclosed by new perimeter fencing on the east, west and south sides and tied into existing fencing at the north end of the site. Site access would be from an existing driveway into the storage area.

### Environmental Effects

The proposed site has been the subject of previous remediation activities and ongoing groundwater monitoring by DEEP. Prior to construction, DNC, under the guidance of a LEP, would sample and characterize the soil to determine proper disposition. Excavated soils determined to contain contaminants that exceed regulatory standards would be removed from the MPS property and disposed of in accordance with appropriate regulatory criteria. Soils that are determined not to be hazardous would be disposed of in an existing soil disposal area on MPS property.



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Erosion and sedimentation controls would be established prior to construction and would be maintained throughout the construction period. No wetlands would be directly impacted by the project. A wetland is approximately 100 feet west of the proposed site and would be isolated from construction activities using appropriate erosion and sedimentation controls as well as maintaining a grass strip on an embankment between the wetland and the site. The Town of Waterford Environmental Planner submitted correspondence to DNC indicating that wetland impact would be minimal as long as the grass filter strip to the west of the site is maintained and the area around the new fencing is reseeded.

A gravel surface would be established around the concrete pad to control any stormwater runoff from the pad. Grassy areas on the east and west sides of the site would be maintained.

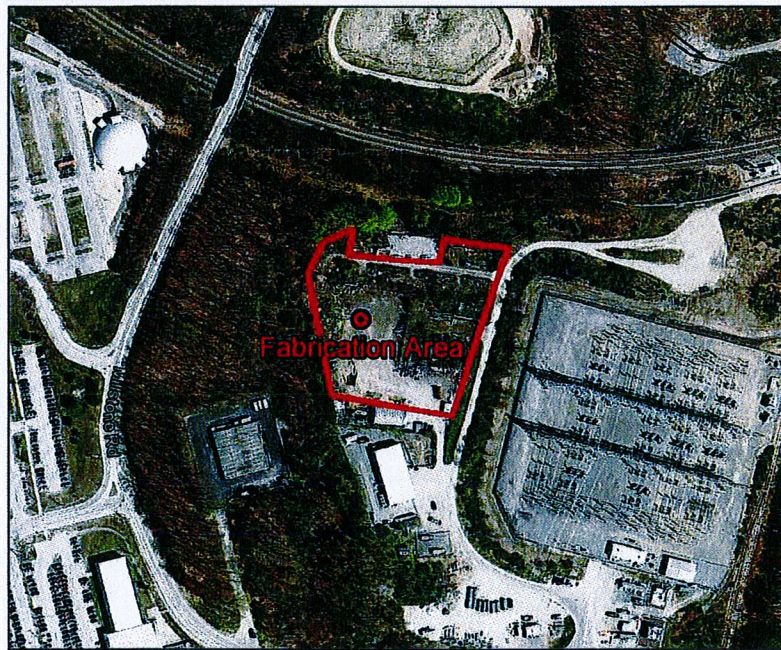
### **Municipal Consultation**

DNC met with Town of Waterford officials in September and November 2015 to discuss the project. Upon the Town's request, DNC submitted additional information to the Town in April 2016. After reviewing the additional information, on May 20, 2016, the Town Planning and Zoning Commission approved the project. Additionally, the Town's Conservation Commission determined the project would not involve regulated wetland activities and would not impact coastal resources.

### **Staff Recommendations**

Staff recommends the following:

1. Use of off-road construction equipment that meets the latest EPA or California Air Resources Board standards, or in the alternative, equipment with the best available controls on diesel emissions, including, but not limited to, retrofitting with diesel oxidation catalysts, particulate filters and use of ultra-low sulfur fuel;
2. Compliance with the provisions of Section 22a-174-18(b)(3)(C) of the Regulations of Connecticut State Agencies that limit the idling of mobile sources to 3 minutes; and
3. Approval of any minor project changes be delegated to Council staff.



(google earth image of site location - site boundaries show in red are approximate)