

CONNECTICUT COALITION AGAINST MILLSTONE
www.MothballMillstone.org

February 7, 2017

Energy & Technology Committee
Connecticut General Assembly
Legislative Office Building
Capitol Avenue
Hartford CT 06106

Re: Proposed Bill No. 106 ("An Act Concerning Zero-Carbon Electric Generating Facilities and Achieving Connecticut's Greenhouse Gas Emissions Mandated Levels. Be it enacted by the Senate and House of Representatives in General Assembly convened: That Title 16a of the general statutes be amended to provide a mechanism for zero-carbon electric generating facilities to sell power to electric utilities. Statement of purpose: To provide a mechanism for zero-carbon generating facilities to sell power to electric utilities.")

Dear Co-Chairpersons and Members of the Energy & Technology Committee:

I write on behalf of the Connecticut Coalition Against Millstone to oppose Proposed Bill No. 106, recited in its entirety above.

According to news media accounts, the proposed bill is intended to have exclusive application to Millstone nuclear power station, Units 2 and 3, owned and operated by Dominion Nuclear Connecticut, Inc., a division of Dominion Resources, Inc., headquartered in Richmond, Virginia.

However, Millstone Units 2 and 3 do not qualify as "zero-carbon [electrical] generating facilities" and the proposed legislation must therefore be rejected.

Among a host of other poisonous radionuclides, Millstone Units 2 and 3 routinely release to our air Carbon-14, a component of

greenhouse gases. Carbon-14 is a radioisotope with a 5,700-year half-life; its biological hazard will persist for 57,000 to 114,000 years once produced inside Millstone's twin reactor vessels. Carbon-14 can cause cancer, birth defects and genetic damage.¹

Thus, not only do Millstone Units 2 and 3 routinely release greenhouse gases in the form of Carbon-14, a contributor to global warming; Millstone's releases have the added characteristic of being radioactive, long-lived and hazardous to health.

Do not doubt Millstone's routine releases of Carbon-14 to our air.

We direct your attention to Dominion's own website (www.dom.com) wherein the company devotes a section to "Millstone Atmospheric Radiation Releases."² We attach a copy for your convenience.

In its projections for planned radiation releases to the atmosphere during the current month of February 2017, Dominion acknowledges *continuous* releases of Carbon-14 from Millstone Unit 2 and Unit 3 ventilation throughout the month.

Millstone's electric generation is not "zero-carbon"; the General Assembly should not enact bogus propaganda of the nuclear industry into law.

Case closed.

¹ For in-depth analysis of routine releases of Carbon-14 to the environment by nuclear reactors, see "Additional comments of Beyond Nuclear on Carbon Pollution Emission Guidelines for Existing Stationary Sources – EPA-HQ-OAR-2013-0602," www.BeyondNuclear.org. We also attach "Routine Radioactive Releases from U.S. Nuclear Power Plants," also available at www.BeyondNuclear.org.

² Dominion is required to post on its website advance notice of planned radiation releases from Millstone to our air pursuant to Connecticut General Statutes §22a-135, enacted in 2008 at the recommendation of the Connecticut Coalition Against Millstone. See attached "About the Connecticut Coalition Against Millstone."

To the extent that the Proposed Bill No. 106 has other intended consequences, they are not spelled out. Proposed Bill No.106 is an unfortunate poster child for stealth legislation.

Members of the Committee have made no secret to the news media of their intention with regard to this bill – to grant Dominion’s representatives and lobbyists’ their unjustified wishes: to enact legislation to guarantee Millstone’s longevity and profitability. However, they have withheld this intention from the language of the bill and thus made a mockery of the “public hearing” process.

What is the basis for Dominion’s request for such a law?

Millstone is profitable; the parent company, Dominion Resources, Inc., operates with robust profits. It is not the proper mission of the state legislature to make a profitable private enterprise reap even greater profit at public expense, particularly where, as here, the company conceals its books from the public.

We offer these further comments:

(1) The State of Connecticut should not guarantee profits over decades for the dirtiest technology known to humankind when its citizens demand development of safe, clean, green sustainable energy for themselves and their families and future generations.

We present the Committee with Dominion’s most recent annual reports of its radiological releases to our air and water. That is, the air we breathe, and the Long Island Sound, its water discharge site surrounded by fishing grounds and public beaches that attract young children and pregnant women who are most vulnerable to the health effects of Millstone’s ionizing radiation.

They are entitled “Dominion Nuclear Connecticut, Inc. Millstone Power Station³ Units 1⁴, 2 and 3 – 2015 Annual Radiological

³ Shortly after its purchase of the Millstone Nuclear Power Station in 2001, Dominion officially petitioned the U.S. Nuclear Regulatory Commission to delete “Nuclear” from its official name. The petition was granted.

Environmental Operating Report” (80 pages) and “Dominion Nuclear Connecticut, Inc. Millstone Power Station Units 1, 2 and 3 – 2015 Radioactive Effluent Release Report” (226 pages). These summaries are based on engineering estimates, not actual measurements. The public will not know until 2019, when the reports covering the year 2017 are scheduled to be submitted to the U.S. Nuclear Regulatory Commission and Connecticut’s DEEP, what levels of radioactivity Millstone is estimated to release to our air and water this year. There is no **actual** measurement of levels of Carbon-14 released to our air and water.

We particularly draw your attention to the “List of Tables” of the Radioactive Effluent Release Report, pages 8 through 50. It makes for unnerving reading. For example, Dominion reports 45 “containment vents” at Millstone Unit 2 over a period of more than 100 hours during 2015 and “abnormal” and uncontrolled gaseous releases of radiation from Unit 2 attributed to a defective fuel bundle. Millstone Unit 3 vented radiation from the containment on 223 occasions during 2015 for more than 76 hours. If you swim at the public beaches in Waterford or East Lyme and beyond, or eat fish caught in Niantic Bay and Jordan Cove and beyond, you may wish to deflect your attention from Section 2.2 (“Liquid Effluents”), which details continues radioactive releases from the Millstone reactors to Long Island Sound. Do resist that impulse, because as state legislators you are the protectors of our lawful right to clean air and clean water and the health, safety and security of the people of Connecticut.

You may prefer to ignore that “solid waste and irradiated component shipments” to South Carolina and elsewhere in 2015 - the transport of which burns up fossil fuels - from defunct Unit 1 contained deadly radioisotopes of plutonium (Pu-238 and Pu-239). Plutonium-239 has a half-life of 24,100 years. But you must consider a transport accident on I-95 in your shoreline communities involving Pu-239 as you consider to artificially prolonging the lives of the

⁴ Although Millstone Unit 1 stopped producing electricity in 1995 and is economically defunct, it continues to continuously release radioactivity to our air and water. See attached “Millstone Atmospheric Radiation Releases.”

Millstone nuclear reactors: Remember that Dominion is not required to be self-insured for the full scope of such an accident.

Please also note Dominion's acknowledgment through its 2015 annual reports of radiological effluent releases that Carbon-14 appears prominently.

The present proposed bill does not demonstrate that Connecticut is friendly to business, as some legislators have told the news media. It demonstrates that Connecticut is friendly to Dominion but unfriendly toward the health, safety and welfare of its residents and businesses devoted to safe, sustainable green energy.

(2) Dominion has publicized several studies it commissioned to make the case that it contributes to the state's economy. Oddly, the studies do not give Millstone credit for the phenomenally profitable boon that has occurred in the cancer care industry since Millstone Unit 1 went online in 1970. Prior to Millstone, southeastern Connecticut did not have a cancer center. Before long, a cancer center opened at the Lawrence Memorial Hospital in New London. The increasing demand for cancer care in New London County has been so pronounced that cancer care services have expanded into separate large and hugely profitable facilities in the area.

(3) The bill apparently intends to vest in DEEP the power to award Dominion with profitable long-term contracts for sales of its electricity. DEEP has a conflict of interest. It is allowing Millstone to operate on a long-term basis on an illegal water discharge permit. The Coalition anticipates that the Connecticut courts will invalidate the current permit in short order. See Burton v. Commissioner, 323 Conn. 668 (released December 13, 2016).

(4) In California, the San Onofre nuclear power plant has recently closed. It is anticipated that substitute power will be provided by renewables and a heightened emphasis on energy efficiency and conservation. If it can be done in California, it can be done here.

We request that the Committee convene a second public hearing on Proposed Bill No. 106 should it be amended from its current skeletal version.

In the meantime, we invite you all to attend and participate in a special information event, co-sponsored by the Coalition, featuring nuclear industry economics expert Tim Judson, executive director of the Nuclear Information and Resource Service, on February 18, 2017 at 6 PM at the Connecticut Forest & Park Association, 6 Meriden Road, Rockfall CT. A flyer describing the event is attached. Admission is free and open to the public.

Sincerely,

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