

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE: : **DOCKET NO. 265**

**PROPOSAL OF DOMINION NUCLEAR :
CONNECTICUT, INC. TO MODIFY THE :
EXISTING MILLSTONE [NUCLEAR] :
POWER STATION TO ESTABLISH :
AN INDEPENDENT SPENT FUEL :
STORAGE INSTALLATION (DRY :
STORAGE SYSTEM) ON PROPERTY :
LOCATED OFF ROPE FERRY ROAD :
IN THE TOWN OF WATERFORD, :
CONNECTICUT :** **FEBRUARY 10, 2004**

CCAM REPLY TO SITING COUNCIL QUERY

The Connecticut Coalition Against Millstone (“CCAM”)¹ replies herewith to the query of the Siting Council concerning CCAM’s Requests for Interrogatories directed to Dominion Nuclear Connecticut, Inc. and the Town of Waterford dated January 29, 2004.

The Siting Council queried by letter dated February 4, 2004 as to the “purpose and relevance” of the discovery questions and “what CCAM is expecting to prove” in order that “the Council can see if the parties can stipulate to certain points.”

The purpose of the discovery is to obtain full disclosure of monetary payments, gifts and benefits by Dominion Nuclear Connecticut, Inc., the applicant, to public officials, towns, charities and other recipients since it assumed ownership of the Millstone Nuclear Power Station on April 1, 2001.

¹ For purposes of this reply, “Connecticut Coalition Against Millstone” or “CCAM” encompasses the Coalition and co-parties Geralyn Cote Winslow, Clarence O. Reynolds, William H. Honan and Dr. Milton C. Burton.

The information is relevant to these proceedings to the extent that such disclosure reveals that such individuals and entities have benefited from Dominion's largesse.

Such benefits may be a factor in influencing and motivating the decisionmaking by the Town of Waterford and its officials in these proceedings, as well as decisionmaking by the membership of the Southeastern Connecticut Council of Governments, also a party to these proceedings.

For example, Paul Eccard, Waterford First Selectman, has cited Dominion's financial contribution to the economy of southeastern Connecticut as justification for keeping the nuclear reactors running past their current license terms and thus generating more longlived nuclear waste for which there is no available longterm storage facility.

Such beneficence is obviously intended to buy good will in the host community and muffle legitimate criticisms of the inherent dangers of Millstone operations, including above-ground storage of nuclear waste in untested canisters near a flood zone beneath an active flight path and within easy reach of a highly populated recreational area under once-a-day surveillance. Thus, it is expected that Dominion's disclosure will acknowledge, for example, its endowment of full scholarships for students of nuclear engineering at the Three Rivers Community College in Norwich and financial support to many other educational, cultural, recreational and health-care organizations in southeastern Connecticut.

Responding to the discovery requests should not be burdensome. Indeed, in the wake of recent revelations of corruption in state government, Attorney General Richard S. Blumenthal, a party to these proceedings, is presently requiring all state contractors and state employees to report all gifts given in the past 10 years valued at \$50 or more. The present request only seeks financial information of transactions occurring after April 1, 2001.

THE COALITION

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CERTIFICATION

This is to certify that a copy of the foregoing was mailed on February 10, 2004 to the following via U.S. Mail, postage pre-paid:

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