

SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

5 Connecticut Avenue, Norwich, Connecticut 06360
(860) 889-2324/Fax: (860) 889-1222/Email: office@seccog.org

STATEMENT OF SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

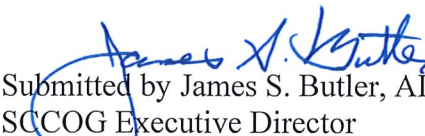
In Response to USDOE Request for Information
on Use of Consent-Based Siting Process for Spent Nuclear Fuel
3 March 2022

The Southeastern Connecticut Council of Governments (SCCOG), representing 22 member municipalities, wishes to go on record in support of the position on this subject submitted to the Department of Energy by SCCOG member Town of Waterford First Selectman Rob Brule (see attached). The Town of Waterford has hosted the Millstone Nuclear Power Station for more than 50 years, and as such has been the location of what was originally intended to be the short-term storage of spent nuclear fuel in the form of Horizontal Storage Modules (HSMs).

The use of a consent-based siting process to establish interim storage sites, and hopefully an eventual final disposal site, will allow the relocation of spent nuclear fuel from reactor sites like Millstone, enabling property at nuclear reactor plants to be more efficiently be utilized toward the generation and provision of this clean energy source. The use of such a process will also allow for a well-planned and considered system of interim sites, which have been vetted by the host communities, and for which serious consideration of social equity and environmental justice issues has been made.

The SCCOG furthermore agrees with and wishes to endorse recommendations made by its member Waterford, especially its position that under the proposed process, communities be provided a final right of refusal as to where these interim storage sites are located if on non-Federal land. The SCCOG also concurs with Waterford's concern that a permanent location for the nation's spent nuclear fuel could be further delayed due to issues similar to those encountered at Yucca Mountain, and therefore the selected and community-approved interim sites should be conceived and constructed for the long-term.

Thank you for this opportunity to comment.


Submitted by James S. Butler, AICP
SCCOG Executive Director

Attachment

Member Municipalities:

Bozrah * Colchester * East Lyme * Franklin * Griswold * Borough of Jewett City * City of Groton * Town of Groton * Lebanon * Ledyard * Lisbon * Montville * New London * North Stonington * Norwich * Preston * Salem * Sprague * Stonington * Stonington Borough * Waterford * Windham

*If language assistance is needed, please contact SCCOG at 860-889-2324, office@seccog.org
Si necesita asistencia lingüística, por favor comuníquese a 860-889-2324, office@seccog.org.
如果您需要语言帮助，请致电 860-889-2324 或发送电子邮件至 office@seccog.org.*

FIFTEEN ROPE FERRY ROAD
WATERFORD, CT 06385-2886



PHONE: 860-442-0553
www.waterfordct.org

March 3, 2022

U.S. Representative Joe Courtney
55 Main Street, Suite 250
Norwich, CT 06360

RE: U.S. Department of Energy to develop and implement a consent-based siting process and to identify a process to move spent nuclear waste to interim storage sites.

Dear Congressman Courtney,

Waterford commends the U.S. Department of Energy for exploring a consent-based process to address long-term siting issues for nuclear fuel storage. The scale and longevity of impacts associated with nuclear activity demand an equitable partnership between host communities and Federal agencies. At its core, a successful consent-based siting program should provide current and potential nuclear host communities with meaningful opportunities to comment on, and final authority to approve or deny any prospective facility in their jurisdictions.

As the host community for Millstone Nuclear Station since 1970, Waterford is specially positioned to comment on both the proposed consent-based process and community issues arising from the lack of a permanent Federal disposal site. Waterford is proud to support safe, long-term, carbon neutral energy production in Southeastern Connecticut. In partnership with the Southeastern Connecticut Council of Governments (SCCOG), and at the request of Congressman Joe Courtney, Waterford is pleased to provide comments on the Department of Energy's Request for Information on Using a Consent-Based Siting Process to Identify Federal Interim Storage Facilities.

Waterford recognizes the need to address interim storage options, and favors a consent-based approach. The Town previously participated in CT Siting Council reviews to permit Horizontal Storage Modules (HSMs) at Millstone in support of ongoing plant operations. Enabling on-site storage was a necessary but temporary step in the absence of a permanent Federal disposal site. Moving HSMs from Millstone to a Federal site would enable productive reuse of property at Millstone to further invest in infrastructure for carbon-neutral energy projects. Millstone is a critical component of State and regional power supply, and is Connecticut's best option to achieve its carbon-neutral energy goals by 2040. Enabling materials to be removed from Waterford will provide additional capacity to support clean energy operations proximal to existing infrastructure.

Waterford further advocates for the following:

1. Removal of existing and future spent fuel from the Millstone Nuclear Station.
2. Provision of adequate security at all stages of storage and transportation, and sufficient funding to address site-specific and route-specific security needs.

3. Dissemination across multiple communication platforms of public information concerning safety protocols for the transport of any spent nuclear fuel from the Millstone site.
4. Continued support for the research and development of best practices and next generation storage of spent nuclear fuel.
5. Provision of impact funds for local emergency management operations throughout the duration of interim storage and until transfer of spent nuclear fuel at Millstone to a Federal temporary or permanent disposal location.

As the consent-based process is refined, Waterford urges consideration of a few key elements. First and foremost, communities should have final and binding opportunity to refuse siting facilities on any non-Federal land within their jurisdiction. Waterford will continue to support the safe storage of materials generated at Millstone for as long as it is necessary to maintain plant operations. Waterford would not consider accepting materials from other locations and would oppose identification of Millstone as a storage location under the new program. Second, selection of interim facility sites should take into account potential future delays in a permanent, central facility. Interim sites should be capable of operating on a semi-permanent basis and should be sized to anticipate capacity needs under current power generation conditions as well as the potential for operational expansion or emerging technologies. Finally, opportunities to co-locate interim storage where materials could be used to support research and development for next-generation nuclear operations should be considered.

Waterford also recommends that communities be afforded opportunities to participate in refining program parameters beyond the March 4th deadline. While local officials were able to meet subsequent to the January 24th request for comment, the timeframe allocated did not allow for meaningful public participation or community comments. As expressed in the DOE's Request for Information, issues of equity factor significantly into the composition of a final process. Ensuring adequate outreach and opportunity for community feedback should be a priority. Thank you for the opportunity to comment. Waterford looks forward to learning more as the Federal program is crafted and welcomes continued conversation on the matter.

Sincerely,

Robert Brule

Rob Brule
First Selectman
Town of Waterford