PROD. & UTIL FAC. 50-423-4A-3

Citizens Regulatory Commission P.O. Box 199 Waterford, CT 06385 December 12,1999 10

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Dear Nuclear Regulatory Atomic Safety and Licensing Board,

The members of the Citizens Regulatory Commission have provided this statement to you in order to voice an opinion concerning this important matter of a licensing amendment which would increase the spent fuel in Unit 3 Spent Fuel Pool. The Citizens Regulatory Commission would strongly urge the NRC Licensing Board, and Rule making staff to refuse Northeast Nuclear Energy Co. to amend its license adding more risk to the health and safety of the local citizens.

There are several reasons why we feel this amendment not be granted. The most important is we still have no solution to the problem of high level waste. Why should we add more waste to a problem we are unable to solve? Once again, the health and safety of the public is put at further risk and the needs of the nuclear industry are granted by the Nuclear Regulatory Commission should it approve this amendment.

The Citizens Regulatory Commission also feels this re-racking increases risk because the spent fuel pool is not in containment. And, once again we are relying on human perfection to maintain the chemical reaction when the pool heats up. Local citizens should agree with the Citizens Regulatory Commission that increasing fuel assemblies at MPS3 should not be sanctioned by this Board, and that they grant a public hearing for more citizens to submit their comments. The Steering Committee of the Citizens Regulatory Commission thank you for your attention to this matter.

CRC Steering Committee

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

NORTHEAST NUCLEAR ENERGY COMPANY

(Millstone Nuclear Power Station. Unit No. 3)

Docket No.(s) 50-423-LA-3

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing LIMITED APPEARANCE STATEMENT have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

Office of Commission Appellate Adjudication U.S. Nuclear Regulatory Commission Washington, DC 20555

Administrative Judge Charles Bechhoefer, Chairman Atomic Safety and Licensing Board Panel Mail Stop - T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555

Administrative Judge Richard F. Cole Mail Stop - T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555

Administrative Judge Charles N. Kelber Atomic Safety and Licensing Board Panel Atomic Safety and Licensing Board Panel Mail Stop - T-3 F23 U.S. Nuclear Regulatory Commission Washington, DC 20555

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Nancy Burton, Esq. 147 Cross Highway Redding Ridge, CT 06876 Docket No.(s)50-423-LA-3 LIMITED APPEARANCE STATEMENT

Dated at Rockville, Md. this 6 day of January 2000

Office of the Secretary of the Commission

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