

50-247

Public Citizen



Buyers Up • Congress Watch • Critical Mass • Global Trade Watch • Health Research Group • Litigation Group
Joan Claybrook, President

April 12, 2000

Suzanne Black
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Ms. Black:

During the April 7th meeting concerning the 2.206 petition filed by UCS, Public Citizen, NIRS and Pace, you indicated that, in your opinion, we had failed to make a sufficient nexus between the restart of Indian Point Unit 2 and the need for the stockpiling and distribution of potassium iodide (KI). Please consider this letter in conjunction with our petition.

It is the sheer impossibility of adequately evacuating and or sheltering the population surrounding Indian Point that makes the stockpiling and distribution of KI imperative. The inadequacy of emergency preparedness at the Indian Point nuclear plant has long been acknowledged by the NRC. In 1979, in the wake of the Three Mile Island meltdown, NRC's Director of the Office of State Programs, Robert Ryan stated that:

I think it is insane to have a three-unit reactor on the Hudson River in Westchester County, 40 miles from Time Square, 20 miles from the Bronx. And if you describe that 50 mile circle, as I said before, you've got 21 million people. And that's crazy. I'm sorry. I just don't think that that's the right place to put a nuclear facility.

And it was bad enough to put one in, but subsequently they put another and then yet another (I)t's a nightmare from the point of view of emergency preparedness.

(Report of the Office of the Chief Counsel on Emergency preparedness to the President's Commission on the Accident at Three Mile Island, October 31, 1979, p. 5.)

Ralph Nader, Founder

215 Pennsylvania Ave SE • Washington, DC 20003 • (202) 546-4996 • www.citizen.org

Printed on Recycled Paper

YEO3

In the footnote accompanying the NRC's Director of the Office of State Programs statement, the report notes that had the melt down at Three Mile Island occurred at Indian Point, evacuation alone might have resulted in the loss of life.

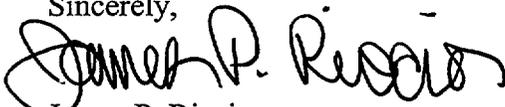
Everybody says what a terrible situation we had at Three Mile Island, and I agree, but can you imagine what it would have been at Indian Point? It would have been clamitous. You would have had dozen, hundreds of people killed perhaps trying to get out of the place, because the roads are, you know, they're North-South roads basically and the narrow old turkey bridge -- I'm from New York so I know the area fairly well -- there are narrow, old bridges, one of the oldest bridges across the Hudson, the Bear Mountain Bridge, is a two lane bridge, you know, going West-East across the Hudson. Its just a ridiculous place....

(Id. at p. 58.)

The NRC has previously acknowledged that Indian Point has the "highest population with in 10, 30 and 50 miles of any nuclear power plant in the U.S. At 50 miles, it population is more than double any other plant site." (U.S. Nuclear Regulatory Commission, Consolidated Edison Company of New York: Indian Point, Units 2 & 3, Memorandum and Order, January 8, 1981, p. 6.)

This fact alone should be sufficient enough to establish the nexus between continued operation of Indian Point Unit 2 and the need for stockpiling and distribution of potassium iodide. When coupled with Consolidated Edison's emergency planning problems, already documented in our petition, the need for KI at Indian Point should even be evident to the NRC.

Sincerely,



James P. Riccio
Public Citizen's Critical Mass Energy Project

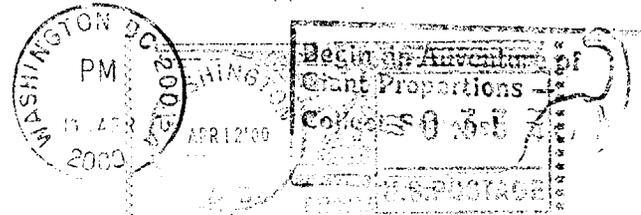
David Lochbaum
Union of Concerned Scientists

Michael Mariotte
Nuclear Information & Resource Service

Ed Smeloff
Pace University Law School Energy Project



215 Pennsylvania Avenue SE • Washington, D.C. 20003



Suzanne Black
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Printed on Recycled Paper

