



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
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Tel 914 272 3500

September 20, 2001
NL-01-114

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

SUBJECT: **Indian Point Nuclear Generating Unit 1**
 Docket No. 50-003
 License No. DPR-5
 Indian Point Nuclear Generating Unit 2
 Docket No. 50-247
 License No. DPR-26
 Request for a Letter of Concurrence from the NRC to the NYSDEC
 regarding compliance with 40 CFR 761.65(a)(1)

- REFERENCE:**
1. USNRC letter, P. Milano to A. Blind/M. Kansler, dated August 27, 2001, regarding "Indian Point Nuclear Generating Unit Nos. 1 and 2 – Order Approving Transfer of Licenses from the Consolidated Edison Company of New York, Inc., to Entergy Nuclear Indian Point 2, LLC, and Entergy Nuclear Operations, Inc. and Approving Conforming Amendments (TAC. Nos. MB0743 and MB0744)"
 2. Consolidated Edison Company of New York, Inc., Indian Point Nuclear Generating Station, 6 NYRCC Part 373 Permit Modification, Volumes I and II, dated March 1, 2001
 3. Order of Consent between New York State Department of Environmental Conservation and Consolidated Edison Company of New York, Inc., Index No. CO3-20010905-2574, dated and executed September 5, 2001.
 4. Goodwin Procter, LLP Letter, Elise N. Zoli to Mitchell Khosrova, dated September 6, 2001, "Entergy Nuclear Indian Point 2, LLC."

Dear Sir:

As you are aware, the Nuclear Regulatory Commission (NRC) recently issued an order transferring the licenses, effective September 6, 2001, for Indian Point Nuclear Generating Stations, Units 1 and 2 (Stations) from the Consolidated Edison Company of New York, Inc. (Con Edison) to Entergy Nuclear Indian Point 2, LLC (ENIP2) as the owner of, and to Entergy Nuclear Operations, Inc. (ENO) as the operating entity for, the Stations (Reference 1).

7/20/01

Con Edison stored certain quantities of "mixed waste" (as defined in 40 CFR §225.210) at the Stations, including pursuant to permits issued by the United States Environmental Protection Agency (USEPA) and the New York State Department of Environmental Conservation (NYSDEC). Con Edison also stored PCB-contaminated mixed waste, for which it sought authorization from NYSDEC in a permit-modification request dated March 2001 (Reference 2). However, Con Edison did not receive the authorization from NYSDEC. Rather, NYSDEC has indicated that it may not issue any authorization, pending New York State's decision on whether to adopt the recently promulgated USEPA exemption (effective November 13, 2001) from applicable permit requirements for storage of mixed waste subject to regulation by NRC. NYSDEC has indicated that it may take two (2) years to make this decision.

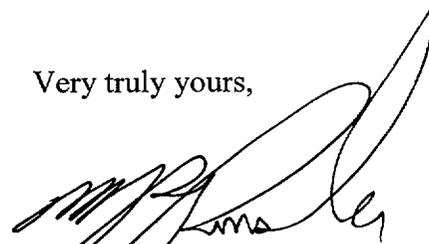
Therefore, on September 5, 2001, an Administrative Order on Consent between NYSDEC and Con Edison was executed (Reference 3), to address Con Edison's storage of PCB-contaminated mixed waste, and ENIP2's continued storage of the material, pending issuance of the NYSDEC authorizations or otherwise. The Order on Consent expressly authorizes storage of and related activities associated the PCB-contaminated mixed waste for which Con Edison had indicated no treatment/disposal facility currently is available. *See Order, ¶ II.*

Certain terms of the Order on Consent are expressly binding on Con Edison's successors and assigns, as ENIP2's counsel confirmed to NYSDEC on September 6, 2001 (Reference 4). Therefore, ENIP2 will implement certain of Con Edison's obligations in the Order on Consent. In particular, the Order on Consent requires Con Edison (or ENIP2) to request from the NRC a written concurrence that such material is stored in accordance with applicable NRC requirements. *See Order, ¶ IV.*

In satisfaction of the Order on Consent, ¶ 5, ENIP2 hereby requests that the NRC provide to ENIP2 and the NYSDEC with a written concurrence that the PCB-contaminated mixed waste at the Station is being stored in compliance with the applicable NRC requirements. The details of the storage are outlined in the enclosed request for permit modification (again, Reference 2). This written concurrence must be submitted to NYSDEC by November 6, 2001. We, therefore, appreciate NRC's prompt response to this request, and gladly will work with you to address this matter.

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours,



Michael R. Kansler
Senior Vice President and
Chief Operating Officer

cc: Next page

cc: Regional Administrator, Region I (w/o encl. III)
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Senior Resident Inspector's Office (w/o encl. III)
Indian Point Unit 2
US Nuclear Regulatory Commission
P.O. Box 38
Buchanan, NY 10511

Mr. Patrick D. Milano, Senior Project Manager (w/o encl. III)
Project Directorate I
Division of Licensing Project Management
U.S. Nuclear Regulatory Commission
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Mr. John L. Minnis, Project Manager (w/o encl. III)
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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

Connie C. Wells, Manager (w/o encl. III)
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440 Hamilton Avenue
White Plains, NY 10603

Elise N. Zoli, Esq. (w/o encl. III)
Goodwin Procter, LLP
Exchange Place
Boston, MA 02109

Division of Environmental Enforcement (w/o encl. III)
Attn: Hazardous Waste Compliance Counsel
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-5500

- Encl.: I. Order of Consent between New York State Department of Environmental Conservation and Consolidated Edison Company of New York, Inc., Index No. CO3-20010905-2574, dated and executed September 5, 2001.
- II. Goodwin Procter, LLP Letter, Elise N. Zoli to Mitchell Khosrova, dated September 6, 2001, "Entergy Nuclear Indian Point 2, LLC."
- III. Consolidated Edison Company of New York, Inc., Indian Point Nuclear Generating Station, 6 NYRCC Part 373 Permit Modification, Volumes I and II, dated March 1, 2001

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

In the Matter of the Alleged Violations of
Environmental Conservation Law ("ECL") of the
State of New York, and Title 6 of the Official
Compilation of Codes, Rules, Regulations of the
State of New York ("6 NYCRR") by:

Order on Consent

Consolidated Edison Company of New York, Inc.

Respondent

Index No. CO3-20010905-2574

WHEREAS:

1. The New York State Department of Environmental Conservation (the "Department") is responsible for enforcement of Article 27, Title 9 of the Environmental Conservation Law ("ECL") and the hazardous waste management rules and regulations promulgated thereunder in 6 NYCRR Part 370 *et seq.* This Order is issued pursuant to the Department's authority under Articles 3, 27, and 71 of the ECL.
2. Consolidated Edison Company of New York, Inc. (the "Respondent") acknowledges that it owns, and conducts operations at, its facility located at Broadway and Bleakley Avenue, Buchanan, New York (the "facility"); and that those operations, and the hazardous waste—including mixed waste—generated during the course of those operations are subject to ECL Article 27, Title 9 and the hazardous waste management regulations promulgated pursuant thereto, contained in 6 NYCRR Parts 370 to 374 and 376.
3. A. For purposes of this Order, "mixed waste" is as defined in 40 CFR 255.210; however, the "hazardous waste" as used in that provision shall refer to "hazardous waste" as defined in 6 NYCRR Part 371. Pursuant to 6 NYCRR 371.4(c), materials containing 50 ppm or greater of polychlorinated biphenyls ("PCBs") are regulated as a hazardous waste under New York State law.

B. The United States Environmental Protection Agency has afforded a regulatory exemption, effective November 13, 2001, for the storage and treatment of mixed waste subject to regulation by the Nuclear Regulatory Commission. The Department is in the process of considering a proposed rulemaking to adopt a similar provision for qualifying mixed waste.
4. A record review of Respondent's facility was conducted by an authorized representative of the Department by telephone on August 16, 2001. As a result, Respondent violated the following hazardous waste management regulations at 6 NYCRR resulting from

Respondent's improper storage of mixed waste at the facility (for purposes of this Order, "the mixed waste"):

- A. 372.2(a)(8)(ii): Acted as an illegal storage facility with respect to the storage of the mixed waste in the Unit 1 Reactor Internal Storage Pit, the Unit 1 Vapor Containment 108-foot Elevation Floor Storage Area, and the Unit 1 Vapor Containment 70-foot Elevation Floor Storage area since February 2000.
 - B. 373-3.9(e): Failed to inspect container storage areas referenced above in Subparagraph 4.A on a weekly basis.
 - C. 373-3.9(d)(3) and 376.5(a)(1)(ii): Failed to label containers stored in the Unit 1 Reactor Internals Storage Pit area with the words "Hazardous Waste" and with other words to identify the contents.
 - D. 372.2(a)(8)(ii), 373-1.1(d)(1)(iii)(c)(2), 373-1.1(d)(1)(iv)(d), and 376.5(a)(1)(ii)(b): Failed to visibly mark containers stored in the Unit 1 Reactor Internals Storage Pit area with the period of accumulation for each container.
 - E. 376.5(a)(1)(ii): Stored the mixed waste in the storage areas referenced above in Subparagraph 4.A of this Order in excess of one year, since February 2000, for the purpose of accumulation necessary to facilitate proper recovery, treatment or disposal.
5. Respondent certifies that the mixed waste is being stored at the facility in a manner protective of the public health, safety, and welfare and the environment in compliance with 40 CFR 761.65(a)(1) but that it cannot dispose of the mixed waste off-site because of the present unavailability of a mixed waste treatment/disposal facility. The Department believes that no mixed waste treatment/disposal facilities will come into existence in the near future; therefore, it recognizes the need to keep the mixed waste stored on-site provided the storage is undertaken in a manner protective of the public health, safety, and welfare and the environment and in accordance with the requirements of the Nuclear Regulatory Commission pertaining to mixed waste storage and treatment.
6. Respondent voluntarily notified the Department of the violations that are the subject of this Order.
7. In March 2001, pursuant to 6 NYCRR 621.13 and 373-1.7, Respondent submitted an application for major modification to the Part 373 Hazardous Waste Management Permit, NYD991304411, to account for the storage and associated activities of the mixed waste
8. Respondent waives its right to a hearing or to otherwise contest the Department's allegations, consents to the issuance of this Order and agrees to be bound by its terms.

NOW, THEREFORE, HAVING CONSIDERED THIS MATTER AND BEING DULY ADVISED, IT IS ORDERED THAT:

- I. Respondent shall pay a penalty for the cited violations in the amount of \$9,000.00 to be paid within 30 days of the effective date of this Order.
- II. Respondent is authorized to continue the on-site storage of and related activities that have been conducted to date for the mixed waste, pending the Department's action on proposed rulemaking referenced in Paragraph 3 of this Order. Respondent and its successors and assigns, including its successors in title to the facility, shall maintain the storage of the mixed waste in a manner protective of the public health, safety, and welfare and of the environment and in accordance with the requirements of the Nuclear Regulatory Commission pertaining to mixed waste storage and treatment.
- III. Respondent shall take all reasonable and diligent efforts to locate and contract with an authorized, commercially reasonable as determined by the Department in consultation with Respondent, mixed waste treatment/disposal facility that will accept the mixed waste and to treat or dispose of the mixed waste within 30 days after the facility's agreement to accept the mixed waste for treatment/disposal; or with such further time as the Department determines is appropriate under the circumstances. Such efforts shall include, but will not be limited to, quarterly searches. Until such a facility becomes available, Respondent shall, beginning December 1, 2001 and on the first day of each three month period thereafter, provide the Department with a certification that (1) describes the efforts Respondent made to locate and contract with an authorized mixed waste treatment/disposal facility; (2) there is no mixed waste treatment/disposal facility available that can accept for treatment or disposal the mixed waste; (3) the continued storage at the facility was necessary to protect the public health, safety, welfare and environment; and (4) during the entire quarter that is the subject of the certification, Respondent complied with the container and storage requirements of the Nuclear Regulatory Commission relating to mixed waste.
- IV. Respondent shall commence an investigation and report to the Department within 60 days of the effective date of this Order as to the possibility of remote monitoring in lieu of weekly inspections pursuant to 6 NYCRR 373-3.9(e) and, if such remote monitoring is possible and approved by the Department, shall implement a remote monitoring system within 60 days of Department approval of the remote monitoring plan.
- V. Within 15 days after the effective date of this Order, Respondent shall make a request to the Nuclear Regulatory Commission to provide to the Department within 60 days after the effective date of this Order a written concurrence by that Commission that the mixed waste is being stored in compliance with its requirements. Failure to secure an adequate response from Nuclear Regulatory Commission within 60 days of the effective date of this Order shall not constitute a violation of this Paragraph.

VI. SETTLEMENT AND RESERVATION OF RIGHTS

- A. Except for Respondent's obligations as provided in Paragraph I and as otherwise provided in Paragraph IX of this Order, Respondent's obligations under this Order shall terminate upon transfer of ownership of the facility to a transferee that agrees in writing to undertake and continue Respondent's obligations under this Order.
- B. Upon completion of all obligations in this Order, this Order settles only all claims for civil and administrative penalties concerning the violations described in Paragraph 4 of this Order against Respondent and its successors and assigns (including successors in title to the facility).
- C. Except as provided in Subparagraph VI.B of this Order, nothing contained in this Order shall be construed as barring, diminishing, adjudicating or in any way affecting any of the civil, administrative, or criminal rights of the Department or of the Commissioner or her designee (including, but not limited to, nor exemplified by, the rights to recover natural resources damages and to exercise any summary abatement powers) or authorities with respect to any party, including Respondent.

VII. ACCESS

For the purpose of monitoring or determining compliance with this Order, Respondent hereby provides to employees and agents of the Department access to the facility and to any site or records owned, operated, controlled or maintained by Respondent and its successor and assigns, in order to inspect and/or perform such tests as the Department may deem appropriate, to copy such records, or to perform any other lawful duty or responsibility. Every effort shall be made by the Department to conduct such inspections during Respondent's and its successors and assigns normal business hours.

VIII. FAILURE, DEFAULT AND VIOLATION OF ORDER

- A. Respondent's failure to comply with any provision of this Order shall constitute a default and a failure to perform an obligation under this Order and shall be deemed to be a violation of both this Order and the ECL.
- B. Respondent's failure to comply fully and in a timely fashion with any provision, term, or condition of this Order shall constitute a default and a failure to perform an obligation under this Order and under the ECL and shall constitute sufficient grounds for modification or revocation of any permit, license, certification, or approval issued to Respondent by the Department relating to the facility.
- C. Any violation of terms or conditions of this Order shall result in a penalty of TWENTY FIVE HUNDRED DOLLARS (\$2,500.00) per day, per violation.

IX. INDEMNIFICATION

Respondent shall indemnify and hold harmless the Department, the State of New York, and their representatives and employees for all claims, suits, actions, damages and costs of every name and description arising out of or resulting from the fulfillment or attempted fulfillment of this Order. Respondent's obligations under this Paragraph IX shall terminate upon the transfer of title of the facility; however, this Paragraph shall be effective against Respondent's successors or assigns, including its successors in title to the facility.

X. BINDING EFFECT

The provisions of this Order shall bind the Respondent and its successors and assigns, including its successors in title to the facility.

XI. MODIFICATION

No change in this Order shall be made or become effective except as set forth by a written order of the Commissioner or the Commissioner's designee.

XII. COMMUNICATIONS

All written communications required by this Order to the Department shall be transmitted by United States Postal Service, by private courier service, or by hand delivery to:

Division of Environmental Enforcement

Attn: Hazardous Waste Compliance Counsel

New York State Department of Environmental Conservation

625 Broadway Albany, New York 12233-5500

All written communications required by this Order to the Respondent shall be transmitted by United States Postal Service, by private courier service, or by hand delivery to:

Jeffrey L. Riback, Esq.

Consolidated Edison Company of New York, Inc.

4 Irving Place

New York, NY 10003

XIII. ENTIRE ORDER

The provisions of this Order constitute the complete and entire Order issued to the Respondent concerning resolution of the violations identified in Paragraph 4 of this Order. No term, condition, understanding, or agreement purporting to modify or vary any term of this Order shall be binding unless made in writing and subscribed by the party to be bound. No informal oral or written advice, guidance, suggestion, or comment by the Department regarding any report, proposal, plan, specification, schedule, comment, or statement made or submitted by Respondent shall be construed as relieving Respondent of its obligations to obtain such formal approvals as may be required by this Order.

XIV. EFFECTIVE DATE

The effective date of this Order is the date that the Commissioner or his designee signs it. The Department will provide Respondent (or the Respondent's counsel) with a fully executed copy of this Order as soon as practicable after the Commissioner or the Commissioner's designee signs it.

Dated: 9-5-01

ERIN M. CROTTY, COMMISSIONER

NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION



By: Carl Johnson, Deputy Commissioner

CONSENT BY RESPONDENT

Respondent hereby consents to the issuing and entering of the foregoing Order, waives its right to a hearing as provided by law, and agrees to be bound by the provisions, terms and conditions herein.

By: *[Signature]*
Title: Vice President EHS
Date: Sept 5 '01

State of New York)

County of New York)

On this 5th day of Sept., in the year 2001, before me, the undersigned personally appeared H. Rose Lawshaw, personally known to me or proved to be on the basis of satisfactory evidence to the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

[Signature]

JAMES J. DIXON, ESQ.
Notary Public, State of New York
No. 5003440
Qualified in Westchester County
Commission Expires October 19, 2002

GOODWIN | PROCTER

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September 6 2001

BY FACSIMILE & E-MAIL

Mitchell Khosrova
Associate Counsel
New York State Department of Environmental Conservation
Division of Environmental Enforcement
625 Broadway
Albany, NY 12233-5500

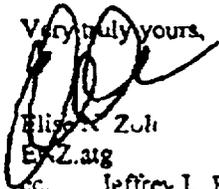
Re: Entergy Nuclear Indian Point 2, LLC.

Dear Mr. Khosrova:

As requested by your office, on behalf of our client, Entergy Nuclear Indian Point 2, LLC ("ENIP2"), this correspondence confirms that ENIP2 acknowledges that, under Paragraphs X and VI(a) of the Order on Consent between the New York State Department of Environmental Conservation and Consolidated Edison Company of New York, Inc. ("Con Edison"), Index No. CO3-20010905-2574, executed by Con Edison on September 5, 2001 and dated September 5, 2001 (the "Order on Consent"), it is the successor in title to Con Edison relative to the Indian Point, Units 1 and 2, Station with respect to the terms and conditions of the Order on Consent to the extent provided therein, and accepts the obligations thereunder.

Of course, please do not hesitate to telephone me (at 617/570-1612) with your questions, comments or concerns.

Very truly yours,


Elise N. Zoh
E.N.Z.ulg

cc. Jeffrey L. Rjback, Consolidated Edison Company of New York, Inc. (via facsimile)
Connie C. Wells, Manager, Entergy Nuclear Operations, Inc. (via facsimile)
Paul R. Gauron, P.C.



conEdison

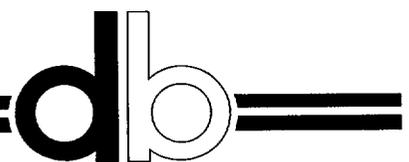
**Consolidated Edison Company of New York, Inc.
Indian Point Nuclear Generating Station
6 NYCRR Part 373**

Permit Modification

VOLUME 1

FEBRUARY 2001

RLA/CORL/CNED1816(12/12/00)



**DVIRKA AND BARTILUCCI
CONSULTING ENGINEERS**

A DIVISION OF WILLIAM F. COSULICH ASSOCIATES, P.C.



**Dvirka
and
Bartilucci**

CONSULTING ENGINEERS

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Steven A. Fangmann, P.E.

March 1, 2001

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Kenneth J. Pritchard, P.E.
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Charles J. Wachsmuth, P.E.

Re: Indian Point Nuclear Generating Station
6 NYCRR Part 373 Permit Modification
D&B 1816-01

Dear Mr. Keppel:

Enclosed please one copy of the document entitled:

*"Consolidated Edison Company of New York, Inc.
Indian Point Nuclear Generating Station
6 NYCRR Part 373 Permit Modification"*

If you have any questions and/or comments regarding this matter, please do not hesitate to contact me at (516) 364-9890.

Very truly yours,

Richard M. Walka
Vice President

RMW/HMKt/cmc

cc: A. Homyk (Con Ed)
B. Cohen (Con Ed)
R. Henry (Con Ed)
E. Zoli (GP)

◆1816RMW01LTR-03.DOC

A. Alan Blind
Vice President

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February 28, 2001

Margaret E. Duke, Regional Permit Administrator
New York State Department of Environmental Conservation
Region 3
21 South Putt Corners Road
New Paltz, New York 12561

Re: Consolidated Edison Company of New York, Inc.
Indian Point Nuclear Generating Station
Request for Permit Modification
NYD991304411

Dear Ms. Duke:

In accordance with 6 NYCRR Part 621.13 and Part 373-1.7, Consolidated Edison Company of New York, Inc. (Con Edison) is requesting a major modification to the Part 373 Hazardous Waste Management Permit for the Indian Point Nuclear Generating Station. Specifically, Con Edison is requesting to modify the permit to authorize the storage of PCB-containing mixed waste (i.e., hazardous and low level radioactive waste) within the Unit 1 Vapor Containment Structure.

We understand that this request for modification meets the requirements for a major modification because it will result in a greater than 25 percent increase in the mixed waste storage capacity at the facility pursuant to 6 NYCRR Part 373-1.7(d)(6).

Accordingly, enclosed please find a modified Part 373 permit application for the Indian Point Nuclear Generating Station. The application consists of two volumes. Volume 1 contains the text of the permit application comprising the 11 sections and exhibits. Volume 2 consists of a completed 6 NYCRR Part 373 Technical Checklist. We have also included a modified Part A Permit Application that has been signed by Con Edison.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Margaret E. Duke, Regional Permit Administrator
New York State Department of Environmental Conservation
Region 3
February 27, 2001

Page Two

Please contact Mr. Roger Keppel at (914) 271-7573 if you have any questions or require further information.

Very truly yours,

Consolidated Edison Company of New York, Inc.



A. Alan Blind
Vice President, Nuclear Power

AB/kd

cc: T. Killeen, NYSDEC Region 3 (w/enc.)
J. Reidy, USEPA Region 2 (w/encl.)
A. Homyk (Con Ed)
B. Cohen (Con Ed)
R. Keppel (Coned)
B. Henry (Con Ed)
E. Zoli (GP)

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**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING STATION
BUCHANAN, NEW YORK**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
PART 373 PERMIT MODIFICATION**

Prepared By:

**DVIRKA AND BARTILUCCI CONSULTING ENGINEERS
330 CROSSWAYS PARK DRIVE
WOODBURY, NEW YORK**

FEBRUARY 2001

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING STATION
NYSDEC PART 373 PERMIT MODIFICATION**

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CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING STATION
NYSDEC PART 373 PERMIT MODIFICATION

**HAZARDOUS WASTE PERMIT APPLICATION
PART A**

PERMIT APPLICATION
PART A

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
NYD991304411	

VII. Operator Information (See instructions)

A. Name of Operator											
CONSOLIDATED EDISON CO. OF NY, INC.											
Street or P.O. Box											
4 IRVING PLACE											
City or Town								State		ZIP Code	
NEW YORK								NY		10003	
Phone Number (Area Code and Number)						B. Operator Type		C. Change of Operator Indicator		Date Changed	
2 1 2 - 4 6 0 - 6 0 6 5						O		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

VIII. Facility Owner (See instructions)

A. Name of Facility's Legal Owner											
CONSOLIDATED EDISON CO. OF NY, INC.											
Street or P.O. Box											
4 IRVING PLACE/SECRETARY & ASSOCIATE GENERAL COUNSEL, ARCHIE M. BANKSTON											
City or Town								State		ZIP Code	
NEW YORK								NY		10003-3598	
Phone Number (Area Code and Number)						B. Owner Type		C. Change of Owner Indicator		Date Changed	
2 1 2 - 4 6 0 - 6 0 6 5						O		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

IX. NAICS Codes (in order of significance; start in left box)

First	2	2	1	1	1	3	Third
(Description)	Electric Services (Nuclear Power Generation)						(Description)
Second							Fourth
(Description)							(Description)

X. Other Environmental Permits (See instructions)

A. Permit Type (Enter code)		B. Permit Number	C. Description
N		NY0004472	Joint SPDES Permit with Entergy (DEC)
E		3-5522-00011	Title V Air Permit (DEC)
E		03-2140	Major Petroleum Storage Facility Lic. (DEC)
E		3-000107	Hazardous Substance Bulk Storage Facility (DEC)
N		NY0250414	Oil/Water Separator (SPDES) Permit (DEC)
N		NY0251135	Oil/Water Separator (SPDES) Permit (DEC)
N		NY0234826	Oil/Water Separator (SPDES) Permit (DEC)

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
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XI. Nature of Business (Provide a brief description)

This facility generates electricity by means of a steam driven turbine generator with the steam produced by a pressurized water nuclear reactor system.

XII. Process Codes and Design Capacities

- A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.**
- B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.**
- 1. AMOUNT - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.**
 - 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.**
- C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.**

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	
<i>Disposal:</i>						
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour	
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln		
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln		
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln		
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven		
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace		
<i>Storage:</i>						
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; or Million Btu Per Hour	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor		
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace		
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace		
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid		
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces		
S99	Other Storage	Any Unit of Measure Listed Below	T93	Other Industrial Furnaces Listed in 40 CFR §260.10		
<i>Treatment:</i>						
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building-Treatment		Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	<i>Miscellaneous (Subpart X):</i>			
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below	
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day	
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour	
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters	
			X99	Other Subpart X	Any Unit of Measure Listed Below	

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
		Million Btu Per Hour	X	Btu Per Hour	I

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XII. Process Codes and Design Capabilities (Continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code <small>(From list above)</small>			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	For Official Use Only			
				1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>					
X 1	S	0	2	5 3 3 . 7 8 8	G	0 0 1				
1	S	0	1	17,575.000	G	0 0 6*				
2										
3				* There is one mixed waste container storage facility consisting of six separate units. The mixed waste storage room has a maximum permitted capacity of 35 fifty-five gallon drums (equivalent to 1,925 gallons). The two mixed waste container storage cargo units each have a maximum permitted capacity of 30 fifty-five gallon drums (equivalent to 3,300 gallons total). The Reactor Internals Storage Pit has a proposed maximum permitted capacity of five nuclear high-intensity containers (NUHIC) and eight Low Specific Activity (LSA) crates (equivalent to 10,135 gallons). The Unit 1 Vapor Containment 108-foot Elevation Floor Storage Area has a proposed maximum permitted capacity of one NUHIC and 14 fifty-five gallon containers (equivalent to 1,720 gallons). The Unit 1 Vapor Containment 70-foot Elevation Floor Storage Area has a proposed maximum permitted capacity of 9 fifty-five gallon drums (equivalent to 495 gallons).						
4										
5										
6										
7										
8										
9										
1 0										
1 1										
1 2										
1 3										

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes (Follow instructions from item XII for D99, S99, T04 and X99 process codes)

Line Number <small>(Enter #s in seg w/XII)</small>	A. Process Code <small>(From list above)</small>			B. PROCESS DESIGN CAPACITY		C. Process Total Number Of Units	D. Description Of Process
				1. Amount (Specify)	2. Unit Of Measure <small>(Enter code)</small>		
X 1	T	0	4				In-situ Vitrification
1	NA						
2							
3							
4							

EPA ID Number (Enter from page 1)	Secondary ID Number (Enter from page 1)
NYD991304411	

XIV. Description of Hazardous Wastes (Continued; use additional sheets as necessary)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES	
				(1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D 0 0 1	1,810*	G	S 0 1	
2	D 0 0 2				included with above (1)
3	D 0 0 7				included with above (1)
4	D 0 0 8				included with above (1)
5	D 0 0 9				included with above (1)
6	D 0 1 0				included with above (1)
7	F 0 0 1				included with above (1)
8	F 0 0 2				included with above (1)
9	F 0 0 3				included with above (1)
1 0	F 0 0 5				included with above (1)
1 1	B 0 0 7	9,282	G	S 0 1	
1 2					
1 3					
1 4		* The total volume for line 1-10 is 1,810 gallons.			
1 5					
1 6					
1 7					
1 8					
1 9					
2 0					
2 1					
2 2					
2 3					
2 4					
2 5					
2 6					
2 7					
2 8					
2 9					
3 0					
3 1					
3 2					
3 3					

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/02
GSA No. 0248-EPA-OT

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XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (See instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	<i>A. Alan Blind</i>	Date Signed	<i>2/28/01</i>
Name and Official Title (Type or print)	A. Alan Blind, Vice President - Nuclear Power		
Owner Signature		Date Signed	
Name and Official Title (Type or print)			
Operator Signature	<i>A. Alan Blind</i>	Date Signed	<i>2/28/01</i>
Name and Official Title (Type or print)	A. Alan Blind, Vice President - Nuclear Power		
Operator Signature		Date Signed	
Name and Official Title (Type or print)			

XIX. Comments

Part XIV contains the existing mixed waste inventory. In addition to the existing mixed waste, D001, D002, D007, D008, D009, D010, F001, F002, F003, F005 and B007 mixed waste may be generated and stored within the MWCSF.

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING STATION
NYSDEC PART 373 PERMIT MODIFICATION**

**SECTION 1.0
INTRODUCTION**

1.0 INTRODUCTION

This document is an application for a modification of an existing permit for the Consolidated Edison Company of New York, Inc. (Con Edison) Indian Point Nuclear Generating Station located in Buchanan, New York (referred to as the Indian Point Generating Station). The application has been prepared pursuant to the requirements of the New York State Department of Environmental Conservation (NYSDEC) Part 373 regulations addressing the operation of a hazardous waste storage facility. The NYSDEC, under the authority of Article 27 of the Environmental Conservation Law, and consistent with New York State regulations promulgated pursuant to the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984, has established an authorized program requiring permits to operate hazardous waste treatment, storage, and disposal facilities. These regulations are published under 6 NYCRR Parts 370, 371, 372, 373-1, 373-2, 373-3, 374, 376 and 378.

The application reflects current operations at the facility with regard to the management and storage of "mixed waste" (waste which is classified as both hazardous and low level radioactive). To support the management and storage of so called "mixed waste," a detailed description and engineering drawings of the mixed waste storage units are provided, including several recently established storage areas located within the Unit 1 Reactor Building. These areas are used for the storage of Polychlorinated Biphenyl (PCB) containing mixed waste.

This Part 373 permit modification application consists of two volumes. Volume No. 1 contains the text of the permit application comprising the 11 sections and exhibits listed in the Table of Contents. Volume No. 2 consists of a completed 6 NYCRR Part 373 Technical Completeness Checklist for Hazardous Waste Tank/Container/Containment Building/Miscellaneous Unit Storage/Treatment Facilities. This checklist is provided to facilitate the review process of the Part 373 permit modification application by the NYSDEC.

**CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
INDIAN POINT NUCLEAR GENERATING STATION
NYSDEC PART 373 PERMIT MODIFICATION**

**SECTION 2.0
FACILITY DESCRIPTION**

2.0 FACILITY DESCRIPTION

This section of the permit modification application includes information on the location of the facility and presents pertinent information regarding the on-site management of mixed waste.

The Consolidated Edison Company of New York, Inc. (Con Edison) owns and operates a Part 373 permitted facility for the storage of mixed waste at the Indian Point Generating Station located in Buchanan, New York. Mixed waste is defined as waste classified as hazardous pursuant to United States Environmental Protection Agency (USEPA) and New York State Department of Environmental Conservation (NYSDEC) regulations as well as being classified as radioactive pursuant to Nuclear Regulatory Commission (NRC) regulations. At the current time there is not sufficient capacity to properly treat and dispose of mixed waste in the United States. As a result of the insufficient treatment and disposal capacity, certain mixed wastes generated at the Indian Point Generating Station are stored within the Mixed Waste Container Storage Facility (MWCSF). A site plan depicting the location of the MWCSF at the facility is provided as Exhibit 2A.

2.1 General Description

The Indian Point Generating Station is located in the Village of Buchanan, Westchester County, New York, on the east bank of the Hudson River (see Figure 2-1). The facility comprises 176 acres and consists of two nuclear reactors (only Unit 2 is functional) and a number of support buildings and facilities. The Entergy Nuclear Northeast, Indian Point Unit 3, LLC Facility (formerly owned and operated by the New York Power Authority) is located adjacent to the main portion of the facility along the south property line. The MWCSF is located within the nuclear power generating portion of the Indian Point Generating Station (referred to as the "Protected Area").

The primary purpose of the Indian Point Generating Station is the production and transmission of electricity. Electrical power is generated by Reactor Unit 2 (Unit 1 has been shut

down and decommissioned). Electricity is generated by means of a steam driven turbine generator with the steam being produced by a pressurized water nuclear reactor system. The Indian Point Generating Station currently stores mixed waste generated from facility maintenance operations, laboratory, analytical samples and remedial activities operations. The facility's current mixed waste inventory includes halogenated/nonhalogenated solvents (NYSDEC waste codes F001, F002, F003 and F005), ignitable waste (D001), corrosive waste (D002), toxic waste (D007-chromium, D008-lead, D009-mercury, and D010-selenium) and PCB waste (NYSDEC waste code B007).

In addition to the mixed waste currently being stored, the Indian Point Generating Station may generate additional mixed waste in the future from maintenance operations and other activities in the nuclear areas of the facility. However, in order to minimize the introduction and use of materials within the nuclear areas of the facility which could result in the generation of mixed waste, Con Edison has instituted a Chemical Material Control Plan (SAO 410) which requires that chemicals brought to the facility be evaluated for health and environmental hazards.

The MWCSF consists of six separate storage units including:

- a mixed waste storage room;
- two mixed waste cargo units;
- the Unit 1 Reactor Internals Storage Pit;
- the Unit 1 Vapor Containment 108-foot Elevation Floor Storage Area; and
- the Unit 1 Vapor Containment 70-foot Elevation Floor Storage Area.

Exhibit 2A at the end of this section presents a site plan showing the general location of each of these areas. A brief description of each is presented below.

Mixed Waste Storage Room

The mixed waste storage room is located in the Chemical Systems Building located adjacent to the south side of the Unit 1 Reactor Building and contains approximately 250 ft² of floor space. It is used for the storage of non-ignitable mixed waste. The permitted storage capacity of the room is thirty-five 55-gallon drums. The floor and walls of the room are constructed of reinforced concrete.

Mixed Waste Storage Cargo Units

The mixed waste cargo units are located adjacent to the north side of the Unit 1 Reactor Building. The units are modular pre-engineered hazardous material storage buildings manufactured by Safety Storage, Inc. and are constructed of steel coated with chemical-resistant surfaces and integral secondary containment systems. The physical dimensions of the units are 23 feet 6 1/2 inches long by 9 feet 3 inches wide by 8 feet 9 inches high. Each unit has a permitted maximum storage capacity of thirty 55-gallon drums. Currently, only one of the units is used for the storage of mixed waste. The second unit is used as a nonhazardous waste accumulation area, and for the storage of empty drums, hazardous materials and emergency equipment. The second cargo unit is planned to be used for storage of mixed waste in the unlikely event that additional storage capacity becomes necessary.

Reactor Internals Storage Pit

The Reactor Internals Storage Pit is located within the Unit 1 Reactor Building. Mixed waste was generated as a result of the removal and processing of PCB-containing sludge from the water storage pool located within the Unit 1 Reactor Building. Waste from the processing of this material was placed in three nuclear high-integrity containers (NUHIC) and seven Low Specific Activity (LSA) crates and stored within the Reactor Internals Storage Pit.

Unit 1 Vapor Containment 108-foot Elevation Floor Storage Area

PCB-containing mixed waste is stored in a segregated area of the Unit 1 Vapor Containment floor at the 108-foot elevation. The waste was also generated from the removal and processing of PCB waste from the Unit 1 Water Storage Pool. The waste was placed in one NUHIC and six overpacked 55-gallon drums.

Unit 1 Vapor Containment 70-foot Elevation Floor Storage Area

PCB-containing mixed waste is stored behind Nuclear Boiler No. 11 at the Unit 1 Vapor Containment Floor 70-foot elevation. The waste consists of PCB-containing mixed waste including sludge and contaminated materials such as PPE, hoses, trash, etc. The waste is stored in eight 55-gallon drums. Three of the drums are stored in overpacks and five are located on secondary containment pallets.

Miscellaneous Wastes

In addition to mixed waste, the facility generates nonradioactive hazardous waste and nonhazardous radioactive waste. All nonradioactive hazardous waste is managed pursuant to USEPA and NYSDEC hazardous waste requirements and is shipped off-site for treatment and disposal within 90 days of initially being placed in storage. All nonhazardous radioactive waste is managed pursuant to the requirements contained in the Indian Point Generating Station NRC operating license and NRC regulations. Exhibit 2A shows the location of the less than 90-day storage area.

2.2 Maps

2.2.1 Topographic Maps

Figure 2-1 provides a site location map indicating the boundary lines of the facility. The site location map is adapted from the USGS Peekskill, New York quadrangle and is at a scale

1 inch = 2,000 feet. It depicts the surrounding topography of the facility, which borders the Hudson River, the predominant environmental feature in the area. At this location it cuts through the Hudson Highlands, which is part of the New England Physiographic Province. The land adjacent to the Indian Point complex ranges in elevation from mean sea level (msl) to 145 feet above msl. The natural topography of the site ranges from approximately 10 feet to 145 feet above msl. A 1,000-foot radius from the MWCSF storage units is also provided on Figure 2-1.

Exhibit 2B provided at the end of this section presents detailed topographic maps of the facility. The drawings show the overall layout of the plant, its buildings and structures, boundaries, access and road system.

2.2.2 Land Use

Exhibit 2C shows the current land use of the area surrounding the Indian Point Generating Station. The MWCSF portion of the Indian Point Generating Station is located in Zone M-2, which is a planned industrial district. This area is surrounded by residential districts to the southeast and open lands to the northeast and southwest. The MWCSF units are located approximately in the middle of the M-2 zoning district near the eastern bank of the Hudson River.

2.2.3 Wind Rose

Exhibit 2D includes wind histograms for the site illustrating the prevailing wind direction and intensities. This information was compiled by Con Edison, using data from the meteorological tower located on the property.

2.2.4 Surface Water

The site location map (Figure 2-1) shows the major surface water bodies near the facility. Exhibit 2E presents the national and New York State wetland inventory maps, which demonstrate that wetlands do not exist within the facility boundaries.

2.2.5 Facility Boundaries

Figure 2-1 and Exhibit 2B indicate the property boundaries of the facility. The portion of the Indian Point property located west of Broadway is bounded by the Entergy Nuclear Northeast, Indian Point Unit 3, LLC Facility (formerly owned and operated by the New York Power Authority) to the south, Broadway to the east, open lands to the north, and the Hudson River to the west. The portion of the Indian Point property located east of Broadway is bounded by the Buchanan Station to the north and northeast (also owned by Con Edison), open lands to the east and south, and Broadway to the west.

2.2.6 Access Control

There are three designated security-controlled areas at the Indian Point Generating Station. They include the following:

- Owner-Controlled Area
- Protected Area
- Vital Areas

A description of each area and the access control measures employed is provided below.

Owner-Controlled Area

This area has the lowest level of security and includes areas outside the perimeter fence. All employees park personal vehicles in parking lots that are within the Owner-Controlled Area but outside the Protected Area.

Protected Area

A perimeter fence surrounds the entire Con Edison Protected Area and adjoining the Entergy Nuclear Northeast, Indian Point Unit 3, LLC Facility (formerly owned and operated by the

New York Power Authority) nuclear generating area. All entrances to the Protected Area are controlled by security checkpoints. Specifically, this requires additional clearance through a security building checkpoint (for personnel) or a security gate (for vehicles) that are each manned continuously. All vehicular traffic within the Protected Area is either company vehicles or contractors; thus, traffic is at a minimum. See Section 6.1 (Security) for a more detailed description of the security measures at the Indian Point Generating Station.

All of the MWCSF units are located within the Protected Area. The mixed waste storage room is located in the Chemical Systems Building. The room is locked at all times. The cargo units are located outside in an alleyway north of the former Unit 1 Reactor Building. The cargo units are locked and have warning signs. The PCB containing mixed waste storage areas are located in the Unit 1 Reactor Building. The Unit 1 Reactor Building is classified as a radiologically controlled area (RCA) and requires a Radiation Work Permit from Health Physics to obtain entry. Each of the MWCSF units has a warning sign which states: "Danger - Hazardous Materials - Authorized Personnel Only - Contact Radwaste Ext. 5585." In addition, the Reactor Internals Storage Pit consists of a vault sealed with a concrete plug, which prevents unauthorized entry.

Vital Areas

The Vital Areas of the facility include the Unit 2 Reactor Building, the Primary Auxiliary Building and other portions of the operational nuclear area of the facility. In addition to the access measures described above, access to a Vital Area requires entry via an electronic security door. None of the MWCSF units are located in a Vital Area.

2.2.7 Injection and Withdrawal Wells

There are no injection or withdrawal wells located on site. All process and cooling water for the plant is drawn from the Hudson River and the public water supply system which uses surface water as its source. Potable water is supplied via the public water supply. Sanitary wastewater is conveyed to the Buchanan publicly-owned treatment works (POTW), and process

wastewater is treated on-site and discharged to the Hudson River in accordance with the facility's State Pollutant Discharge Elimination System (SPDES) permit.

2.2.8 Runoff Control System

Storm water runoff is collected and conveyed in a storm water drainage system, which is permitted in accordance with a SPDES permit (Permit No. NY0004472). This permit is jointly issued to Con Edison and Entergy Nuclear Northeast. Exhibit 2F depicts the storm water discharge locations at the facility. As shown in Exhibit 2F, there are a total of nine direct storm water discharges to the Hudson River (DSN 001 to DSN 009). Three of these direct storm water discharges (DSN 002, DSN 003 and DSN 004) are associated with the Con Edison-owned portion of the Indian Point complex.

Storm water runoff from the oil tank farm, located within the Owner-Controlled Area of the facility, is conveyed to an oil/water separator for treatment prior to discharge to the ground surface pursuant to a separate SPDES permit (Permit No. NY0251135). Storm water runoff from the simulator building transformer vault (also located within the Owner-Controlled Area) is conveyed to an oil/water separator for treatment prior to discharge to the ground surface pursuant to SPDES Permit No. NY0250414.

Storm water runoff from an oil storage tank at the Con Edison Buchanan Gas Turbine Site, which is part of the Con Edison-owned Indian Point property, is conveyed to an oil/water separator for treatment prior to discharge to the ground surface pursuant to SPDES Permit No. NY0234826. This facility is located east of Broadway across from the Indian Point Generating Station.

2.2.9 Sanitary and Process Sewage

Sanitary wastewater generated at the Indian Point Generating Station is conveyed via a sanitary sewer system for treatment at the Village of Buchanan POTW. Process wastewater and cooling water are discharged to the Hudson River in accordance with SPDES Permit No. NY0004472.

2.2.10 Loading and Unloading Areas

In order to provide an efficient, safe and environmentally sound method of transferring containers of waste into appropriate storage units, Con Edison employs the following general procedures to load, unload and transfer containers into the MWCSF for storage:

- Containers are inspected for damage or leaks.
- If any containers are noticed to be leaking or damaged before transport, they are overpacked and relabeled.
- Appropriate labels are affixed to the containers before transport. They are then transported by truck or other mechanical means (e.g., drum cart, forklift) from the point of generation to the appropriate mixed waste storage unit.
- Drums are then removed from the transport vehicle by mechanical drum handlers or manually using drum carts and are placed within the mixed waste storage room or placed within the mixed waste cargo unit.

2.2.11 Fire Control Systems

Section 7.0 of this permit modification application contains a description of fire control systems associated with the Indian Point MWCSF.

2.2.12 Flood Control/Drainage Barriers

Based upon a Flood Insurance Rate map dated July 27, 1979 (Village of Buchanan, NY Flood Insurance Rate Map I-01), obtained from the Federal Emergency Management Agency, the Indian Point site is located above the 100-year floodplain. Thus, there are no flood control devices required and a Floodplain Management Plan is not required. A copy of the Flood Insurance Rate map is provided as Exhibit 2G at the end of this section.

2.3 Location Information - Floodplain Standard

Exhibit 2G shows areas located within the 100-year floodplain, which has an elevation of 8 feet above msl. The location of the mixed waste storage room is 53 feet above msl, the cargo units are approximately 70 feet above msl, the floor of the Reactor Internals Storage Pit is approximately 35 feet above msl, and the other PCB-mixed waste storage areas are at an elevation of 70 feet and 108 feet above msl. Thus, the MWCSF units are above the 100-year floodplain.

2.3.1 Demonstration of Compliance: Flood Proofing Flood Protection; and Flood Plan

Since the MWCSF units are located above the 100-year floodplain, this section is not applicable.

2.3.2 Plan for Compliance with Floodplain Standard

A plan for compliance is not required since the MWCSF units are located above the 100-year floodplain.

2.4 Traffic Information

The main access to the facility is located at the intersection of Bleakley Avenue and Broadway. Traffic within the Protected Area is restricted to company and contractor vehicles. No personal vehicles are allowed within this area. All roadways within this area are paved and have designed load bearing capabilities to handle truck traffic. A typical Indian Point Generating Station roadway consists of a 6-inch to 9-inch granular subbase of coarse sand, or sand and rock. On top of this subbase is a 6-inch granular stone base course followed by a 3-inch penetration macadam base course. The wearing surface consists of 2-inch bituminous concrete. All roadways are sloped to provide adequate drainage. Mixed waste is transferred from the point of generation to the MWCSF units via the facility's paved roadways as discussed in Section 2.2.10.

EXHIBIT 2A

SITE PLAN

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DOCUMENT/REPORT
EXHIBIT 2A**

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D-1

EXHIBIT 2B

TOPOGRAPHIC MAPS

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"INDIAN POINT GEN STATION
SITE DEVELOPMENT PLAN",
SHEET 4 OF 5
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SHEET 3 OF 5
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A253874-01**

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EXHIBIT 2C

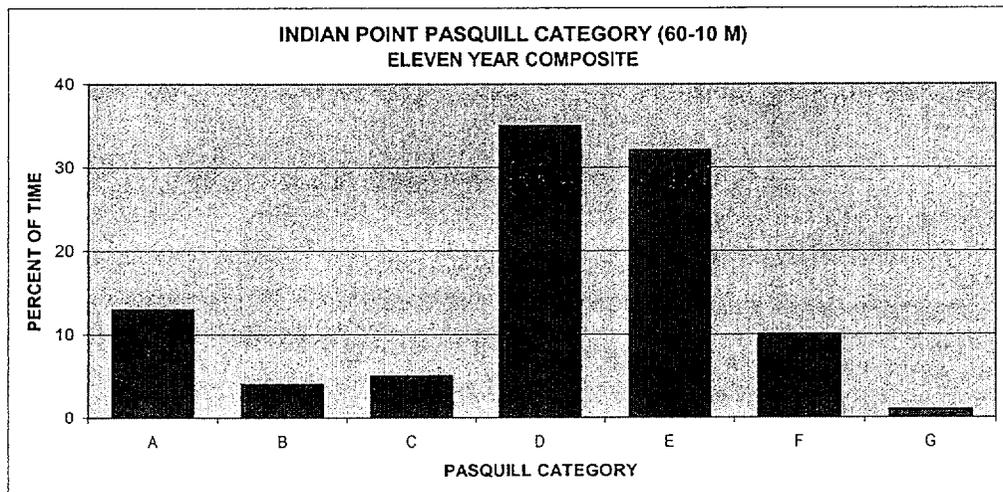
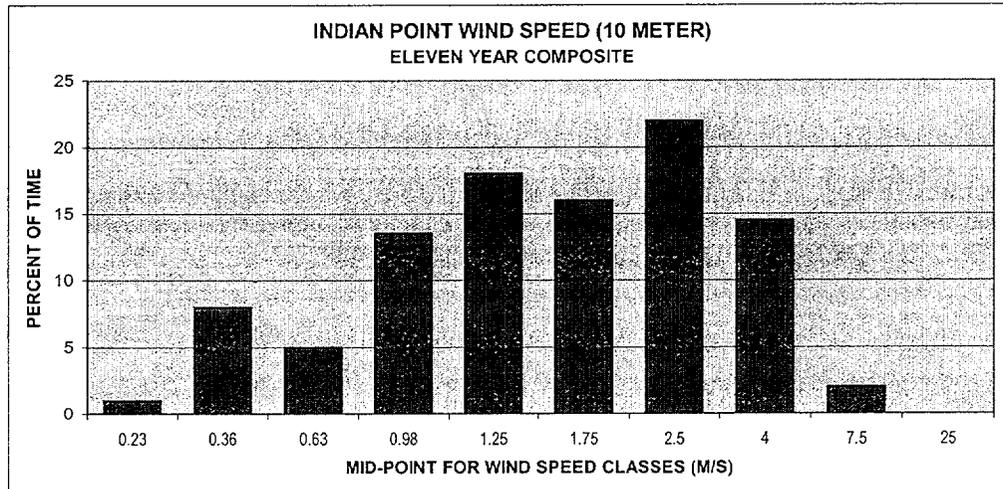
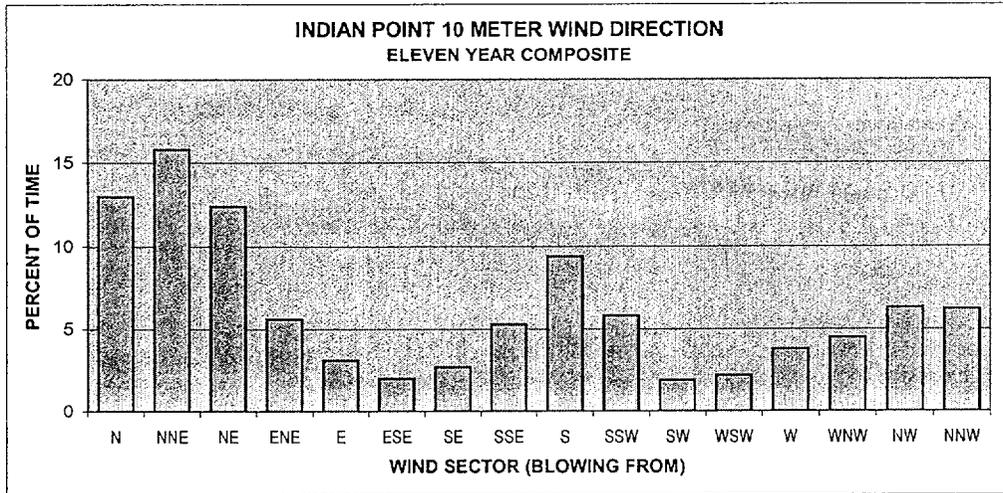
LAND USE MAP

EXHIBIT 2D

WIND HISTOGRAMS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
 INDIAN POINT NUCLEAR GENERATING STATION

Wind Histograms



Source: September 1993 Part 373 Permit Application

EXHIBIT 2E

FEDERAL AND NEW YORK STATE FRESHWATER WETLANDS MAPS

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MAP
"VILLAGE OF BUCHANAN,
WESTCHER COUNTY,
NEW YORK,
ZONING MAP"
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"NATIONAL WETLANDS
INVENTORY,
UNITED STATES DEPARTMENT
OF INTERIOR"**

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MAP
"PEEKSKILL QUADRANGLE,
NEW YORK,
7.5 MINUTE SERIES
PLANIMETRIC,"
SECOND EDITION 1973
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