OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: Aug 03, 2004 17:39

PAPER NUMBER:	LTR-04-0494
LOGGING DATE:	08/03/2004
ACTION OFFICE:	EDO

To: Dyer, NRR

cys: EDO
DEDMRS
DEDH
DEDM
AO
DEDR
Q1

AUTHOR:	Jame Gennaro
AFFILIATION:	NM
ADDRESSEE:	Michael Kansler
SUBJECT:	Request information regarding Entergy's proposal for an independent spenft storage installation at the Indian Point nuclear power plant
ACTION:	Appropriate
DISTRIBUTION:	RF
LETTER DATE:	07/15/2004
ACKNOWLEDGED	No
SPECIAL HANDLING:	
NOTES:	
FILE LOCATION:	ADAMS
DATE DUE:	**DATE SIGNED:**

JAMES F. GENNARO
COUNCIL MEMBER
24TH DISTRICT, QUEENS

□ DISTRICT OFFICE
185-10 UNION TURNPIKE
FRESH MEADOWS, NY 11366
(718) 217-4969
FAX (718) 217-4968

□ CITY HALL OFFICE
250 BROADWAY, ROOM 1773
NEW YORK, NY 10007
(212) 788-6956

gennaro@council.nyc.ny.us

THE COUNCIL
OF
THE CITY OF NEW YORK

CHAIR
ENVIRONMENTAL PROTECTION

COMMITTEES
FINANCE
PUBLIC SAFTEY
SANITATION & SOLID WASTE MANAGEMENT
MENTAL HEALTH, MENTAL RETARDATION, ALCOHOLISM, DRUG ABUSE & DISABILITY SERVICES

July 15, 2004

Michael R. Kansler
President - Entergy Nuclear Northeast
440 Hamilton Avenue
White Plains, NY 10601

Geoffrey Schwartz
Indian Point Energy Center Dry Cask Storage Project Manager
Entergy Nuclear Northeast
440 Hamilton Avenue
White Plains, NY 10601

Dear Mr. Kansler and Mr. Schwartz:

I am writing to request additional information regarding Entergy's proposal for an independent spent fuel storage installation at the Indian Point nuclear power plant. Entergy's dry cask storage proposal has raised a range of safety and security concerns, and my office is interested in your response to several related questions and additional information requests. These questions and information requests are attached.

If you have any questions, please feel free to contact me or my Chief of Staff, Peter Washburn, at my District Office (718-217-4969). I thank you for your time and consideration.

Sincerely,

James F. Gennaro
Council Member

Attachment

Questions and Additional Information Requests Related to Independent Spent Fuel Storage Installation at the Indian Point Nuclear Power Plant

1. To what extent will Entergy's dry cask storage proposal alleviate the high density configuration of the irradiated ("spent") fuel pools which have been re-racked several times over the years in order to accommodate additional spent fuel? It has been related to me that Entergy agreed last year to requests from elected officials asking the company to move all the spent fuel older than 5 years (time required for adequate cooling) into dry cask storage, thereby freeing up space in the pools which would allow for the reconfiguration of the pools to a low-density arrangement. Could you comment on this?

2. Would reducing the density of the spent fuel pools lessen the risk of and potential hazard associated with a spent fuel fire? It has been related to me that if all the spent fuel older than 5 years is not removed from the pools and placed into dry storage and the high-density pools are not re-racked to a lower density, then the overall risk would be increased with the addition of the dry cask storage system (along side the high-density pools). Could you comment on this?

3. With the future of the proposed central high-level radioactive waste dump at the Yucca Mountain facility in question, please opine on the best way to address the dilemma posed by the possible lack of a long-term waste storage solution. In your response, please indicate what can be done at the Indian Point plant to address this dilemma?

4. Assuming that the Yucca Mountain facility opens in 2015, the waste shipments from Indian Point to this facility would take place over the course of three decades. This means that spent fuel would remain onsite at Indian Point until the late 2030s or early 2040s. In the interim, would it be appropriate to emphasize the fortification of both the wet (i.e. pools) and dry (i.e. casks) spent fuel storage systems? If so, how could this best be accomplished? Would it be appropriate to construct a containment structure over the storage pools? Would it be appropriate to conceal the dry casks, which are proposed to be stored on an open concrete pad, from line-of-sight and an attack from the air? Are soil berms, an above-ground bunker system, a beamhenge appropriate for consideration? If not, please explain.

5. How much additional spent fuel waste would be generated if Indian Point were re-licensed for an additional 20 years of operation and where would such waste be stored? Would the Yucca Mountain facility, if it were to open, have sufficient capacity to accept the spent fuel waste from Indian Point produced during its initial 40-year licensing period as well as the spent waste produced during a 20-year period after re-licensing?

6. Please explain why Entergy selected the Holtec cask over other models. Also, please compare the cost of the "HI-STORM 100"cask with other models currently available. Finally, please discuss why the Holtec cask is a good "fit" for Indian Point and whether Entergy will

have to make modifications to the spent fuel pool building in order for these casks, when in the vertical position, to be moved back out.

7. It has been related to me that several industry and government officials have publicly discussed manufacturing and design flaws associated with Holtec's "HI-STORM 100" casks. It is also my understanding that, due to concerns about the Holtec cask, the Nuclear Management Company selected a different cask manufacturer for the plants it manages. Please describe any actions being taken or contemplated to address the concerns that have been raised about the quality assurance of Holtec's dry casks?

8. Please describe the extent to which Entergy's dry cask storage proposal takes into consideration the latest research conducted by the Lamont-Doherty Earth Observatory on recent seismic activity along the Ramapo fault? In your description, please specifically address: a) how recent is the seismic hazard data in Entergy's possession; b) the seismic qualifications of the Holtec "HI-STORM 100" casks proposed for use at Indian Point; c) precautions Entergy is contemplating or planning to avoid the consequences of seismic activity on the cask pad; and d) the extent to which plans address the potential for seismically triggered (or other type of triggered) rock slides to cause damage to the casks on the pad, including knocking over casks and/or pushing casks off the pad and entering into the river. Also, please comment on the pad's design relative to dynamic loads.

9. Please describe the site-specific characteristics has Entergy taken into consideration in assessing the presumptive impact that the construction of the dry cask storage system will have on the environment.

10. Through what means does Entergy propose to move the dry casks offsite if and when a long-term repository becomes available (e.g., truck, barge, rail)? It is my understanding that the Department of Energy (DOE) recently released its Record of Decision on the Yucca Mountain-transport decisions, which indicated a preference for rail shipments but also included the possibility of barge usage. In the event that long-distance transport would be through rail, would Entergy still need to use barges and heavy haul trucks to transport containers to the nearest railhead?

11. Through what local route or routes would spent fuel be transported from the Indian Point plant to a long-term repository? In responding to this question, please specifically address proposed highway routes and bridges, including both the Bear Mountain Bridge and Tappan Zee Bridge.

12. It is my understanding that DOE has proposed the use of both legal-weight trucks and rail casks moved by heavy haul truck or barge from Indian Point. Please describe the risks associated with trucking the casks to the Bear Mountain Bridge and barging the casks down the Hudson River past Manhattan to a port in New Jersey.

13. In light of the transport modes and routes that might be used, please describe Entergy strategy to developing a coordinated plan for preventing and responding to a severe transportation accident or terrorist attack on a shipment.

have to make modifications to the spent fuel pool building in order for these casks, when in the vertical position, to be moved back out.

7. It has been related to me that several industry and government officials have publicly discussed manufacturing and design flaws associated with Holtec's "HI-STORM 100" casks. It is also my understanding that, due to concerns about the Holtec cask, the Nuclear Management Company selected a different cask manufacturer for the plants it manages. Please describe any actions being taken or contemplated to address the concerns that have been raised about the quality assurance of Holtec's dry casks?

8. Please describe the extent to which Entergy's dry cask storage proposal takes into consideration the latest research conducted by the Lamont-Doherty Earth Observatory on recent seismic activity along the Ramapo fault? In your description, please specifically address: a) how recent is the seismic hazard data in Entergy's possession; b) the seismic qualifications of the Holtec "HI-STORM 100" casks proposed for use at Indian Point; c) precautions Entergy is contemplating or planning to avoid the consequences of seismic activity on the cask pad; and d) the extent to which plans address the potential for seismically triggered (or other type of triggered) rock slides to cause damage to the casks on the pad, including knocking over casks and/or pushing casks off the pad and entering into the river. Also, please comment on the pad's design relative to dynamic loads.

9. Please describe the site-specific characteristics has Entergy taken into consideration in assessing the presumptive impact that the construction of the dry cask storage system will have on the environment.

10. Through what means does Entergy propose to move the dry casks offsite if and when a long-term repository becomes available (e.g., truck, barge, rail)? It is my understanding that the Department of Energy (DOE) recently released its Record of Decision on the Yucca Mountain-transport decisions, which indicated a preference for rail shipments but also included the possibility of barge usage. In the event that long-distance transport would be through rail, would Entergy still need to use barges and heavy haul trucks to transport containers to the nearest railhead?

11. Through what local route or routes would spent fuel be transported from the Indian Point plant to a long-term repository? In responding to this question, please specifically address proposed highway routes and bridges, including both the Bear Mountain Bridge and Tappan Zee Bridge.

12. It is my understanding that DOE has proposed the use of both legal-weight trucks and rail casks moved by heavy haul truck or barge from Indian Point. Please describe the risks associated with trucking the casks to the Bear Mountain Bridge and barging the casks down the Hudson River past Manhattan to a port in New Jersey.

13. In light of the transport modes and routes that might be used, please describe Entergy strategy to developing a coordinated plan for preventing and responding to a severe transportation accident or terrorist attack on a shipment.