

From: "C.J. Miller" <MillerC@co.rockland.ny.us>
To: <IndianPointEIS@nrc.gov>
Date: Mon, Sep 24, 2007 5:04 PM
Subject: Statement from CE Vanderhoef of Rockland County

CJ Miller
Senior Advisor
Communications and Public Relations
Rockland County Executive C. Scott Vanderhoef
11 New Hempstead Road
New City, NY 10956
845-638-5645

8/10/07

72FR 45075

13

RECEIVED

2007 OCT - 1 PM 3:20

RULES AND DIRECTIVES
BRANCH
USNRC

This email, including attachments, may include confidential and/or proprietary information. If the reader of this email is not the intended recipient or his or her authorized agent, the reader is hereby notified that any dissemination, distribution, or copying of this email is prohibited. If you have received this email in error, please notify the sender by replying to this message and deleting this email immediately.

CC: "Vincent Altieri" <AltieriV@co.rockland.ny.us>, "Jeff Fortunato" <FortunaJ@co.rockland.ny.us>, "Sean Mathews" <MathewsS@co.rockland.ny.us>, "C. Scott Vanderhoef" <VanderhS@co.rockland.ny.us>, "John Weslowski" <WeslowsJ@co.rockland.ny.us>, "Patricia Zugibe" <ZugibeP@co.rockland.ny.us>

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-013
Gdd = PDD plan (bnp)
J.S. CAVERTY (ISCI)

Mail Envelope Properties (46F82633.7BD : 0 : 30653)

Subject: Statement from CE Vanderhoef of Rockland County
Creation Date Mon, Sep 24, 2007 5:02 PM
From: "C.J. Miller" <MillerC@co.rockland.ny.us>

Created By: MillerC@co.rockland.ny.us

Recipients

nrc.gov

TWGWPO03.HQGWDO01
IndianPointEIS

co.rockland.ny.us

ZugibeP CC (Patricia Zugibe)
WeslowsJ CC (John Weslowski)
VanderhS CC (C. Scott Vanderhoef)
MathewsS CC (Sean Mathews)
FortunaJ CC (Jeff Fortunato)
AltieriV CC (Vincent Altieri)

Post Office

TWGWPO03.HQGWDO01

Route

nrc.gov
co.rockland.ny.us

Files	Size	Date & Time
MESSAGE	663	Monday, September 24, 2007 5:02 PM
ipstatement07.pdf	102714	
Mime.822	142937	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled



COUNTY OF ROCKLAND
OFFICE OF THE COUNTY EXECUTIVE

Allison-Parris County Office Building
New City, New York 10956
Tel. (845) 638-5122
Fax. (845) 638-5426

C. SCOTT VANDERHOEF
County Executive

September 24, 2007

Chief Rules and Directives Branch
Division of Administrative Services
Office of Administration Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-001

To Whom It May Concern:

As Rockland County Executive, I represent a county of nearly 300,000 residents, approximately 120,000 of which live in a ten-square mile Emergency Planning Zone (EPZ) directly across the Hudson River from the Indian Point nuclear power plant in Buchanan, NY.

Along with my counterparts in Westchester, Putnam, and Orange Counties, I am responsible for the safety and security of the people I represent. Although Rockland enjoys an enviable record with respect to its ability to respond to emergency situations, this same level of response cannot be guaranteed, nor can the safety of Rockland residents, in the event of an emergency at Indian Point. It is for this reason, and for numerous others cited below, that I oppose the re-licensing of the facility.

The normal risks associated with operating a nuclear power plant increase proportionally when such a facility is located in a densely populated area like Rockland County, and indeed, the entire area in the four-county EPZ. The Witt Report, issued January 2003, determined that despite our County's satisfactory evaluation during drill exercises measuring response to an emergency at Indian Point, such preparedness would not be enough to protect residents who live within the EPZ. The report clearly states: "The current radiological response system and capabilities are not adequate to overcome their combined weight and protect the people from an unacceptable dose of radiation in the event of an uncontrolled release of radiation from Indian Point."

Rockland County is unique in the fact that it is home to many public parks and the Palisades Center mall, which could contribute to temporarily increasing the county's transient population by more than 100,000 people within the EPZ during certain times of the year. The imminent construction of a new Tappan Zee Bridge which will likely increase Rockland's permanent population has also not been taken into consideration when weighing criteria for re-licensing of the nuclear power plant in Westchester.

Our present road infrastructure, which includes major transportation corridors including the New York State Thruway, the Palisades Interstate Parkway, and many state highways, cannot adequately handle a mass evacuation in a short period of time – under three hours. I continue, with County Executive Spano in Westchester, to refuse to authorize evacuation plans sanctioned by the Federal Emergency Management Association (FEMA) that we feel would not guarantee the safety of the residents that live in this County in the event of a release of radiation from the nuclear reactors located in Buchanan, NY, owned and operated by Entergy Northeast.

Federal regulations adopted by the Nuclear Regulatory Commission nearly 30 years ago make no provision for the re-licensing of such a facility in a highly residential area. In my opinion, these regulations must be updated in order to take population figures and the safety of residents of such areas into account; not only for new nuclear power plants, but for existing plants as well.

Those factors, coupled with the stark reality that we still do not yet have an adequate emergency notification system, beg the obvious question: If a new plant would not meet the criteria for licensing under current federal regulation, how then can a license be renewed for an existing plant in an area where the population continues to grow and the transportation infrastructure would hamper a mass evacuation?

The demographics of Rockland County and the surrounding areas within the EPZ notwithstanding, there are numerous operational issues experienced by Entergy Northeast with regard to the day to day operation of the Indian Point nuclear power plant that cause grave concern about the safety of our residents. Each time an issue arises, Entergy and the NRC assure us that the numerous problems that have occurred at both plants are “under control” and pose no serious threat to the surrounding population. Such continuous problems, however, illustrate the deterioration of an aging and outdated facility that can no longer be called “safe and secure.”

These objections do not begin to address security concerns in a post 9-11 world, including the possible threat of a terrorist attack on the facility, the proximity of Stewart Airport and associated air traffic, and the potential increase in air traffic over Rockland and Westchester Counties associated with the New York/New Jersey/Philadelphia Airspace Redesign Project.

Taking all these factors into account, it is inconceivable that the Nuclear Regulatory Commission could consider the Indian Point Nuclear Power Plant for re-licensing. I strongly urge that the best and most effective way to protect the public in the event of an emergency at Indian Point is for the NRC to order the plant decommissioned immediately.

Sincerely,



C. Scott Vanderhoef
COUNTY EXECUTIVE