From: gary shaw <crotonshaw@optonline.net>
To: <IndianPointEIS@nrc.gov>
Date: 10/12/2007 9:46:10 PM
Subject: Formal comment on EIS Scoping

Dear Mr. Pham and other NRC Staff:

As a designer of marketing research projects and a data analyst, I am very familiar with the use of benchmarks and action standards. I spend considerable energy to ensure that the metrics in my research are well defined and consistent with established protocols. That is one of the reasons that I am so concerned about the NRC's evaluations of Indian Point and the relicensing process overall.

One of the terms that the NRC uses repeatedly is "reasonable assurance," and this term is not at all clearly defined. Consequently, there can be neither validation nor refutation of any finding of "reasonable assurance" by the agency charged with protecting the public's health and safety from nuclear materials.

The NRC is considering extending the operating licenses of Indian Point units 2 and 3 for twenty more years beyond their expirations in 2013 and 2015 respectively, and will cite reasonable assurance that the plants will remain safe and environmentally benign for that twenty year extension.

I formally request that before proceeding with the relicensing process, the NRC define a set of standards and the specific measurements that will be used for the following issues:

a.. State how many linear feet of piping transport radioactive and non-radioactive water that is inaccessible to visual inspection
b.. State by what methods other than test wells will be used to evaluate the level of rust or corrosion of those pipes and what percentage of the pipes will be tested to validate the finding
c.. State the method by which pipe welds that are inaccessible to visual inspection will be evaluated for long term viability and what percentage of total welds will be tested to validate the finding
d.. State what calculations have been made as to the number of spent fuel

assemblies that will have to be stored in casks on the above ground concrete platform over the next 20 years of operation, how much space that will require

e.. State what calculations have been made to estimate the number of new leaks that will occur over the additional twenty years of operation, given that the agency can not determine how many leaks are currently releasing radioactive materials into the groundwater.

f.. State what computer modeling has been conducted to estimate the impact of global warming on Hudson River water temperature, given that heat waves across Europe have precluded the use of some river water for cooling and some plants had to be taken offline until temperatures returned to safe levels.

g.. State what measures or calculations have been made to say that the Emergency Evacuation Plan will be successful. State which of James Lee Witt's contentions of plan insufficiency are incorrect or have been remedied.

If the NRC cannot provide a well defined set of metrics, how can they establish standards that must be met to warrant twenty additional years of operations for this aging and leaking facility. We have already seen absurd examples of the NRC's idea of reasonable assurance. With the potential danger of radiological contamination, how can we accept this agency's judgments if they cannot define their standards and prove the validity of their metrics?

Thank you for your consideration.

Gary Shaw

9 Van Cortlandt Place

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