

## IPRenewalCEmails

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**From:** jscarola@ramapo.edu  
**Sent:** Wednesday, March 11, 2009 7:37 PM  
**To:** IndianPointEIS Resource  
**Cc:** medelste@ramapo.edu  
**Subject:** DSEIS comments  
**Attachments:** Regarding Supplement 38.doc

Attached are my comments regarding the DSEIS.  
Thank you,  
Julianne Scarola

**Federal Register Notice:** 73FR80440  
**Comment Number:** 50

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**Subject:** DSEIS comments  
**Sent Date:** 3/11/2009 7:37:16 PM  
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**From:** jscarola@ramapo.edu

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**Recipients:**  
"medelste@ramapo.edu" <medelste@ramapo.edu>  
Tracking Status: None  
"IndianPointEIS Resource" <IndianPoint.EIS@nrc.gov>  
Tracking Status: None

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Drew Stuyvenberg  
Project Manager  
U.S. Nuclear Regulatory Commission

### Regarding Supplement 38

While attending Ramapo College of New Jersey I am currently enrolled in an Environmental Assessment class. Our class has had an opportunity to review Entergy's DSEIS Supplement 38 for the license renewal for Indian Point. This has been a worthwhile experience as I have learned a great deal about Indian Point power plant, and the extensive process that must take place for process renewal. Most importantly I have been educated in the area of understanding impact statements and what should be included.

Unfortunately I have discovered a number of pertinent issues that have not been addressed or discussed in full. In the GEIS under NUREG-1437 Supplement 38 2-50 it states, "The angled screen system did not significantly reduce impingement mortality" ... Con Edison and the New York Power authority elected to install Ristroph screen system. "No further studies were conducted after the installation of the modified Ristroph system at IP2 and IP3 to determine actual mortality of key species, and no additional impingement monitoring was conducted." So the screens were replaced to reduce impingement, but when they were replaced no study was conducted to see if it is a change for better or for worse. Impingement rates were obviously a large enough issue initially to change the screens so it is extremely important to follow up after replacing them. Thus, a study must be conducted to see the impacts of impingement on the Ristroph screens.

The second issue I feel needs to be addressed concerns the subsistence fishermen. This is an environmental justice issue that cannot be ignored. It was stated in the DEIS on page 2-109 that, "Contaminated ground water is moving into the Hudson River...Public exposure can occur from the ground water entering the Hudson River through consumption of fish". Continuing on page 2-108 the DEIS states, "The principal exposure pathway to humans is from the assumed consumption of aquatic foods taken from the Hudson River in the vicinity of Indian Point that has the potential to be affected by radiological effluent releases." Are there signs warning the public of where these releases are located, and which spots should not be fished? How might radioactivity released from Indian Point affect the fishery and the safety of fish consumption?

Also it is stated in the Draft NUREG-1437, Supplement 38 2-104 that Strontium-90 were potentially plant-related radionuclide detected in some environmental samples. Strontium-90 is being released, but the direct health effects of the releases are not specified. Since it is being released and a potential health hazard all the impacts should be stated. The EPA recognizes the source of Strontium-90 coming from a by-product of the fission of uranium and plutonium in nuclear reactors. Strontium 90 can be absorbed into the body through inhalation, and ingesting along with food and water. When it is ingested 70-80% passes through the body, the remaining 20-30% is deposited in the bones, and 1% is distributed among the blood. Strontium-90 is similar to calcium, which is why it is known as the 'bone seeker' and deposited in bone. Internal exposure is linked to bone cancer, cancer of the soft tissue near the bone, and leukemia. New information should be

taken into consideration and studied further, for example The Mothers Milk Project. Some members of the public have become concerned with the affects of Strontium-90 and the effect on lactating mothers of humans and animals. The DSEIS stated in Supplement 38 on page 2-106 from a report done by the New York State Department of Health Monitoring (NYSDOH) in 1993, "No milk sample was collected, as the remaining nearby dairy farm had closed." In 1994 the (NYSDOH) again reported, "No milk samples were collected in 1994, as the last dairy farm closed in 1992." Now it has come to the public's attention that human breast milk, along with other lactating animals may have been exposed to Strontium-90. Particularly given the Mothers Milk Study, it is clear that it is both possible to get milk samples for testing and that the results are such tests are required for the final SEIS. In the DSEIS on page 2-105 states that the low levels f Strontium-90 found are due to atmospheric testing. A study is required to confirm this assumption and to assure that biomagnification does not lead to unexpected concentrations. Such a study will serve as the basis for establishing public trust and peace of mind if done well and contamination is undetected.

The FGEIS should also attend to the issues of spent fuel rod storage and the viability of evacuation plans. Not having a concrete place to store spent fuel rods or having a viable evacuation plan is completely irresponsible. These are major issues that need an immense amount of attention that are receiving much too little.

Given the higher vulnerability of women and children, the DGEIS errors in using the 30-year-old white male as the basis of effects modeling. Risk analysis should be based upon impacts to those with greatest vulnerability not the least. This seems to be a way to hide the fact that women and children have a much higher risk to exposure, and gives people a false reassurance.

It is stated in 2-85 Supplement 38 three federally listed species, may or may not be on location. The potential presence of federally listed species must be studied and confirmed or disconfirmed in the FGEIS.

Thank you for your time,  
Julianne Scarola

#### References

EPA. <http://www.epa.gov/rpdweb00/radionuclides/strontium.html>. Date accessed 3-4-09

<http://www.mothersmilkproject.org/>