IPRenewalCEmails

From: Marion Walsh [marionwalsh@optonline.net]
Sent: Thursday, March 19, 2009 12:03 AM
To: IndianPointEIS Resource

To the Nuclear Regulatory Commission:

I offer the following comments to the draft plant-specific supplement to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS), NUREG-1437, regarding the renewal of operating licenses DPR-26 and DPR-64 for an additional 20 years of operation for the Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3), as a concerned citizen, a parent, and a resident of Cortlandt Manor since 1995. I presently serve on the Board of Education of the Hendrick Hudson School District but am commenting as a concerned individual.

I respectfully request that the Nuclear Regulatory Commission reject the conclusion that there are no environmental impacts that would preclude renewal of the operating license for the Indian Point nuclear power plant. Further, the NRC should reject the draft EIS as legally insufficient.

The supplement to the Generic Environmental Impact Statement (GEIS), which is being issued for public comment that purportedly addresses the potential environmental impacts specific to the Indian Point plant site (Supplement 38 to the GEIS) , quite frankly, shocks the conscience in its superficial analysis.

I. There is no Specific Analysis of the Environmental Impact of the Continued Operation of IP2 and IP3 on Children in the area

While I recognize that children are included in the analysis of the effects of radiation on the general population, radiation risks pose the greatest risk to children. The draft EIS only mentions the following about children:

"*IP2 and IP3 are located in the Hendrick Hudson Central School District, Westchester County, 10 which had an enrollment of approximately 2800 students in 2003. Including the Hendrick 11 Hudson Central School District, Westchester County has 40 school districts with a total 12 enrollment of approximately 147,000 students"*.

This is inadequate.

II. The Draft EIS Does not Adequately Consider the Growth in Population

The Draft EIS has acknowledge that approximately 16,791,654 people live 8 within 50 mi (80 km) of IP2 and IP3 (Entergy 2007a). This equates to a population density of 2138persons per sq mi (825 persons per sq km). The Draft EIS has acknowledged that IP2 and IP3 are located in a high-population area. Further, county populations are expected to continue to grow in all four counties in the next decades although Westchester County's population is expected to increase at a lower rate. However, the Draft EIS does not adequately consider this population growth, particularly in planning for a severe accident.

III. The NRC should Reconsider Severe Accident Mitigation Alternatives

In the relicensing of an aging nuclear facility, at the very least, the NRC should be more vigilant in assessing cost measures and not engage in a pro forma, deferential analysis of the costs of safety design measures provided by the plant owner. The environmental assessment should at least basis, besides costs, for not incorporating severe accident mitigation design alternatives.

Pursuant to 10 C.F. R. , § 51.30 an environmental assessment for a standard design certification must identify the proposed action, and will be limited to the consideration of the costs and benefits of severe accident mitigation design alternatives and the bases for not incorporating severe accident mitigation design alternatives in the design certification. An environmental assessment for an amendment to a design certification will be limited to the consideration of whether the design change which is the subject of the proposed amendment renders a severe accident mitigation design alternative previously rejected in the earlier environmental assessment to become cost beneficial, or results in the identification of new severe accident mitigation design alternatives, in which case the costs and benefits of new severe accident mitigation design alternatives and the bases for not incorporating new severe accident mitigation design alternatives in the design certification must be addressed.

Accordingly, I respectfully request that the NRC at the very least reconsider the benefits at least some of the following severe accident mitigation alternatives for IP2 and IP3 and not reject them only because the costs outweigh the associated benefits:

SAMA 9—Create a reactor cavity flooding system to reduce the impact of core-concrete interaction from molten core debris following core damage and vessel failure (cost beneficial in revised analysis, with uncertainties).

SAMA 28—Provide a portable diesel-driven battery charger to improve direct current (dc) power reliability. Safety-related disconnect would be used to change a selected battery. This modification would enhance the long-term operation of the turbine-driven auxiliary feed water (AFW) pump on battery depletion.

SAMA 44—Use fire water as backup for steam generator inventory to increase the availability of steam generator water supply to ensure adequate inventory for the operation of the turbine-driven AFW pump during SBO events (cost beneficial with uncertainties).

SAMA 53—Keep both pressurizer power-operated relief valve block valves open. This modification would reduce the CDF contribution from loss of secondary heat sink by improving the availability of feed and bleed (cost beneficial in revised analysis, with uncertainties).

SAMA 54—Install a flood alarm in the 480-volt (V) alternating current (ac) switchgear room to mitigate the occurrence of internal floods inside the 480-V ac switchgear room.

SAMA 56—Keep residual heat removal (RHR) heat exchanger discharge valves, motor26 operated valves 746 and 747, normally open. This procedure change would reduce the CDF contribution from transients and LOCAs (cost beneficial with uncertainties). SAMA 60—Provide added protection against flood propagation from stairwell 4 into the 480-V ac switchgear room to reduce the CDF contribution from flood sources within stairwell 4 adjacent to the 480-V ac switchgear room.

SAMA 61—Provide added protection against flood propagation from the deluge room into the 480-V ac switchgear room to reduce the CDF contribution from flood sources 33 within the deluge room adjacent to the 480-V ac switchgear room.

SAMA 65—Upgrade the alternate safe shutdown system to allow timely restoration of reactor coolant pump seal injection and cooling from events that cause loss of power from the 480-V ac vital buses.

IP3:

SAMA 30—Provide a portable diesel-driven battery charger to improve dc power reliability. Safety-related disconnect would be used to change a selected battery. This modification would enhance the long-term operation of the turbine-driven AFW pump on battery depletion.

SAMA 52—Proceduralize opening the city water supply valve for alternative AFW system pump suction to enhance the availability of AFW system.

SAMA 53—Install an excess flow valve to reduce the risk associated with hydrogen explosions inside the turbine building or primary auxiliary building (cost beneficial in
revised analysis, with uncertainties).
SAMA 55—Provide the capability of powering one safety injection pump or RHR pump using the Appendix R diesel (MCC 312A) to enhance reactor cooling system injection
12 capability during events that cause loss of power from the 480-V ac vital buses.
SAMA 61—Upgrade the alternate safe-shutdown system to allow timely restoration of reactor coolant pump seal injection and cooling from events that cause loss of power
from the 480-V ac vital buses.
SAMA 62—Install a flood alarm in the 480-V ac switchgear room to mitigate the occurrence of internal floods inside the 480-V ac switchgear room.

IV. The Ground Water Issue Requires Further Research

One of the key points on the abnormal leak and ground water monitoring program: The draft EIS states that "[*t]he annual calculated exposure to the maximum exposed hypothetical individual, based on application of Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Release of Reactor Effluents for the Purpose of Evaluation Compliance with 10*
14 CFR Part 50, Appendix I," relative to the liquid effluent aquatic food exposure pathway is currently, and expected to remain, less than 0.1 % of the NRC's "As Low As is
Reasonably Achievable (ALARA)" guidelines of Appendix I of Part 50 (3 mrem/yr (0.03 mSv/yr) total body and 10 mrem/yr (0.1 mSv/yr) maximum organ), which is considered to
be negligible with respect to public health and safety, and the environment. This is by no means certain, and as noted by its own terms, is hypothetical. The NRC should require further research.

TThe National Research Council (2006) noted, for example, that ". . . the additional 2 GW required if IP2 and IP3 were to be closed could be met by some suitable combination of new generation in the New York City area, efficiency improvements and demand-side management, and new transmission capability from upstate." This is not a certain statement because the exact effects of the additional GW into the environment are unknown.

Conclusion

Essentially, the NRC staff has not identified any new and significant information during its independent review of the IP2 and IP3 ER, the site audit, the scoping process, or evaluation of other available information. Therefore, the NRC staff concludes that there are no offsite radiological impacts (individual effects) of the uranium fuel cycle during the renewal term beyond those discussed in the GEIS. Essentially, the NRC is concluding that because it has not identified impacts in the past, none exist for the future. This is unsound for several reasons:
The population in the area has incaof the last twenty years is new, and the NRC, should at the very least acknowledge that the plant does pose a risk to an increased number of people if a severe accident occurs. Moreover, the radiation released from the plant poses a risk to a greater number of people.

The NRC staff concludes that the socioeconomic impacts of plant shutdown would likely be small and have moderate effects for the Hendrick Hudson Central School District, Village of Buchanan, Town of Cortlandt, and the Verplanck Fire District. I agree with this assessment and believe that the increased safety and vitality to our area if Indian Point shuts down would more than compensate for the lost revenues. I respectfully

I oppose relicensing Indian Point because I believe that the continued operation of an aging nuclear power plant in such a heavily populated area creates an unreasonable risk of harm to citizens, most of all to the most vulnerable individuals, our children. At the very least, the NRC owes a duty to those living in the shadow of IP 2 and IP3 to conduct a more thorough, searching analysis, particularly of the impacts of a severe accident as

well as day-to-day low levels of radiation. I urge you to please recognize that the health and safety of, literally, millions of citizens rely on this statement to consider all environmental impacts, including those of a catastrophic accident. The meet the requirements of the law to serve public safety and is unduly deferential to the plant owners and operators. I respectfully request that the NRC reject the Draft EIS as deficient as a matter of law and conduct further research.

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