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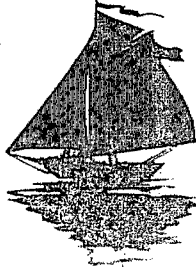
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HUDSON RIVER SLOOP
CLEARWATER, INC

September 25, 2009

VIA U.S. MAIL AND E-MAIL

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-001
Attn: Rulemakings and Adjudications Staff
Rulemaking.Comments@nrc.gov

Re: Revisions to Environmental Review of Nuclear Power Plant Operating Licenses
(10 C.F.R. Part 51, RIN 3150-142, NRC-2008-0608, 74 Reg. 38,117 (July 31,
2009)

Dear Rulemakings and Adjudications Staff:

Hudson River Sloop Clearwater, Inc. ("Clearwater") hereby respectfully requests that the Nuclear Regulatory Commission extend the comment period for the above-referenced rulemaking proceedings by 90 days. As an organization dedicated to addressing environmental issues related to the operation of Indian Point power plant and that is an Intervenor in the proceedings for the license renewal application for Indian Point, Clearwater has a vested interest in the subject rulemaking.

The proposed rule attempts to update findings made 13 years ago that relate to the environmental reviews for nuclear power plant license renewal. Since the time of the

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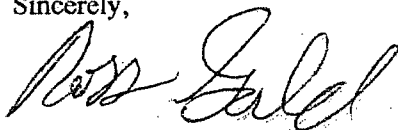
findings significant events and new knowledge have fundamentally changed the baseline environment. A significant amount of time is required to provide a thorough review of the NRC's update to determine whether the proposed modifications are appropriate in today's environmental landscape. Granting additional time for meaningful public input will be beneficial to the process and allow for a more comprehensive and transparent review by the NRC.

The need for ample time for the review and comment is evidenced by the fact that NRC itself required a substantial amount of time and effort to propose revisions. Indeed, the NRC spent three years since the first 10-year review cycle ended in 2006 devising the proposed changes. The resulting draft documents incorporating the NRC's changes (Generic Environmental Impact Statements (GEIS) for License Renewal of Nuclear (NUREG-1437, Revision 1), Regulatory Guide 4.2, Supplement 1, Revision 1, and Environmental Standard Review Plan, Supplement 1, Revision 1 (NUREG-1555)), are quite voluminous in nature and will take considerable amount of time to properly review and analyze.

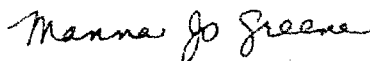
We believe that the current 75-day comment period, which expires on October 14, 2009, is not a sufficient amount of time to provide Clearwater and the public with a full and fair opportunity to provide meaningful comments. Therefore, Clearwater submits that the comment period should be extended for an additional 90 days.

Thank you very much for your consideration of this request. Should someone with to contact us to discuss any of the foregoing, please contact Ross Gould at (917) 658-7144, or via e-mail at rgouldesq@gmail.com.

Sincerely,



Ross Gould
Member



Manna Jo Greene
Environmental Director