



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

OCT 16 1970

Dear Mr. Chairman:

Pursuant to Section 5 of Public Law 89-605 as amended and other authorizations, we are presenting the views of the Department of the Interior in the matter of the application by the Consolidated Edison Company for an operating license for Indian Point Nuclear Generating Unit No. 2, Buchanan, New York, AEC Docket No. 50-247 (Amendment No. 9). The following comments incorporate those submitted by the Federal Water Quality Administration, the Fish and Wildlife Service and the Bureau of Outdoor Recreation.

The unit under review is the second of three units completed or being constructed at the Indian Point site. We note that applications for construction permits for two more units to be located approximately one mile south of the Indian Point site were made in June 1969.

The Department of the Interior does not object to the issuance of the operating license to the Consolidated Edison Company for Unit No. 2 of the Indian Point Nuclear Power Plant. Our position is based upon the firm commitment by the Company as expressed in its responses to the Atomic Energy Commission that it will meet the water quality standards applicable to the receiving waters and that it will take whatever steps are necessary to mitigate any harmful effects that operation of the plant may have on the fishery resources of the Hudson River and tributary waters.

The Company should be commended for the cooperation it has extended to representatives of this Department during the course of our review. The studies which the Consolidated Edison Company is presently engaged in indicate the Company's concern for the potential damages to the environment that could result from operation of this unit and the others planned at and in the vicinity of Indian Point.

We are pleased to note that the Company has made provisions to open part of its land holdings for compatible public recreation use. We express the hope that the Company's public use plans will be finalized and fully implemented at the earliest possible time.

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Consolidated Edison has initiated or participated in a number of studies to determine the effects of both radiological and thermal discharges from the Indian Point reactors upon both the temperature distribution and the aquatic life of the Hudson River through its consultants, Quirk, Lawler and Matusky Engineers, and the Alden Research Laboratories of Worcester Polytechnic Institute. The Company has conducted mathematical studies of the probable temperature in the River and has checked these estimates with hydraulic model studies and actual field studies. In addition, Consolidated Edison has supported several independent but coordinated studies of the micro-organisms and aquatic life in the Hudson River and the probable effects of temperature and salinity changes upon them in the vicinity of the Indian Point Plant.

These studies are continuing and have been and will be helpful in assessing the effects of the Indian Point Unit No. 2 and of the other thermal plants which are proposed for construction on the shores of the Hudson River in the vicinity of Indian Point.

We have been provided information on plans for environmental monitoring of radiological and thermal releases proposed as a part of the operating license application. We understand that the plans for water quality monitoring, including radiological concentrations in the environment in microscopic and macroscopic aquatic life are acceptable to the State of New York. They appear reasonable and are considered generally acceptable to the Department of the Interior.

Through the monitoring programs the Company should have the necessary information to control its activities in a manner that will not violate applicable New York State as well as Federal water quality standards, recommendations of any enforcement conference or hearing board approved by the Secretary or order of any court under Section 10 of the Federal Water Pollution Control Act, and/or other State and Federal water pollution control regulations.

In view of the extensive and valuable fish and wildlife resources in the project area, it is imperative that every possible effort be made to safeguard these resources. Therefore, it is recommended that the Consolidated Edison Company be required to:

1. Continue to work closely with the Department of the Interior, New York State Department of Health, and other interested State and Federal agencies in developing plans for radiological surveys.

2. Conduct pre-operational radiological surveys as planned. These surveys should include but not be limited to the following:
  - a. Gamma radioactivity analysis of water and sediment samples collected within 500 feet of the reactor effluent outfall.
  - b. Beta and Gamma radioactivity analysis of selected plants and animals (including mollusks and crustaceans) collected as near the reactor effluent outfall as possible.
3. Prepare a report of the pre-operational radiological surveys and provide five copies to the Secretary of the Interior prior to project operation.
4. Conduct post-operational radiological surveys similar to that specified in recommendation (2) above, analyze the data, and prepare and submit reports every six months during reactor operation or until it has been conclusively demonstrated that no significant adverse conditions exist. Submit five copies of these reports to the Secretary of the Interior for distribution to appropriate State and Federal agencies for evaluation.

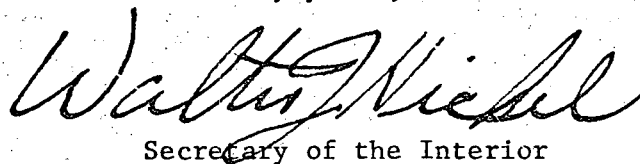
In addition to the above, the Atomic Energy Commission should urge the Consolidated Edison Company to:

1. Meet with the Department of the Interior, New York State Department of Environmental Conservation, New York State Department of Health, and other interested Federal and State agencies at frequent intervals to discuss new plans and evaluate results of the Company's ecological and engineering studies;
2. Conduct post-operational ecological surveys planned in cooperation with the above named agencies, analyze the data, prepare reports, and provide five copies of these reports to the Secretary of the Interior every six months or until the results indicate that no significant adverse conditions exist;

3. Construct, operate, and maintain fish protection facilities at the cooling water intake structure as needed to prevent significant losses of fish and other aquatic organisms; and
4. Modify project structures and operations including the addition of facilities for cooling discharge waters and reducing concentrations of harmful chemicals and other substances as may be determined necessary.

We appreciate the opportunity to provide these comments.

Sincerely yours,

A handwritten signature in cursive script, reading "Walter D. Hickel".

Secretary of the Interior

Honorable Glenn T. Seaborg  
Chairman, United States  
Atomic Energy Commission  
Washington, D. C. 20545