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Cornwall Project (Consolidated)

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September 9, 1966

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OFFICE OF
HEARING EXAMINERS

Atomic Energy Commission
Atomic Safety and Licensing Board
Washington, D. C. 20545

Attention: Mr. Samuel W. Jensch, Chairman

Re: Application of Consolidated
Edison Company, Indian Point
Nuclear Generating Unit No. 2,
Docket No. 50-247. *(Suppl)*

Gentlemen:

As counsel for National Parks Association, an intervenor in the matter of Consolidated Edison Company of New York, Inc., Project No. 2338, before the Federal Power Commission, relating to the proposed pumped storage hydroelectric project at Storm King Mountain in Cornwall, New York, which intervention is for the purpose of protecting the public interest with respect to the scenic beauty of the Hudson highlands and its historic sites, the recreational aspects of the area, the conservation aspects, the marine ecology in respect to both commercial and sport fishing, and for the protection of public parks, the following questions are submitted for consideration and resolution at the hearing now scheduled for September 14 at Buchanan, New York.

1. In a statement issued June 2, 1965, by William D. Manley, Chairman of the Advisory Committee on Reactor Safeguards, which appears as Appendix 4 of the hearings printed for the use of the Joint Committee on Atomic Energy, entitled, "Proposed Extension of AEC Indemnity Legislation", pages 248-257, it is stated in the section entitled "Engineered Safeguards", in pertinent part, on page 251:

"None of the large power reactor facilities now under construction or described in current license applications is considered suitable for location in metropolitan areas. To put the matter in a different way, the devices and safeguards that prevent all accidents, large or small, must be made

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even more reliable than they are now, and the consequences-limiting safeguards must be made even more foolproof. The questions to be settled are complex ones whose resolution would depend on the nature and details of each proposal. It also appears that novel reactor systems and reactors that have considerably higher power levels than previous ones should not be operated in population centers."

Since the proposed nuclear generating unit No. 2 will be the largest of its kind yet proposed, what are the safeguards that are being taken that will render it "even more foolproof", and how can the location of this large power reactor facility be justified, in view of its close proximity to the largest metropolitan area on the East Coast and in very close proximity to the principal water resources of such metropolitan area?

2. In the above-mentioned hearings printed for the use of the Joint Committee on Atomic Energy, in an article entitled "These Days---Woudl Atom Plant Creat Peril Here?", by John Chamberlain, beginning at pages 282-294, Appendix F in such article, captioned "How Safe Is A Reactor?", quotes from a book entitled "Safety Aspects of Nuclear Reactors", by Dr. C. Rogers McCullough, the former Chairman of the AEC Advisory Committee on Reactor Safeguards. Included in such reference is the statement, "It is also desirable to have the reactor site not be located on a main water shed. From the point of view of the hazard alone, it is of course desirable to have the reactor site far from populous or vital industrial areas."

a. What justification is there for deliberately locating this largest yet atomic electric generating facility on the main stream of the New York watershed and immediately above the most populous area?

b. To what extent will the granting of the petition be based upon the acceptance of an element of luck?

This question is based upon Dr. McCullough's observation that:

"Perhaps it is important again to emphasize the degree of public hazard that might follow a reactor accident. Assuming that good luck prevails and no one is killed, it may nevertheless be necessary to evacuate a large city, to abandon a major watershed,

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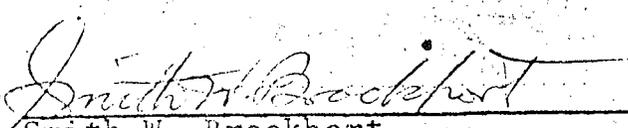
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and very probably it would be necessary to make the reactor site itself a forbidden area for some years to come."

It is respectfully requested that the above questions be taken up on the record in the course of the hearing.

Very truly yours,

BROOKHART, BECKER & DORSEY

By 
Smith W. Brookhart

Counsel for National Parks Association

cc: Randall J. LeBoeuf, Jr., Esq.