

BEFORE THE  
UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

In the Matter of )  
 )  
CONSOLIDATED EDISON COMPANY ) Docket No. 50-247  
OF NEW YORK (Indian Point, )  
Unit No. 2) )  
 )

SUMMARY OF POSITION OF THE  
CITIZENS COMMITTEE FOR THE PROTECTION  
OF THE ENVIRONMENT WITH RESPECT TO THE APPLICATION  
FOR AN OPERATING LICENSE FOR INDIAN POINT, UNIT No. 2

There is a fundamental inconsistency in the present level of development of nuclear power. While power generating companies, such as Consolidated Edison, claim to have placed major reliance upon the use of nuclear power sources to supply base load requirement for anticipated power needs, the Atomic Energy Commission is feverishly pursuing a program of research and development to attempt to determine whether assumptions which have been made about the safety of nuclear power plants are valid. Thus in WASH 1146 (Water Reactor Safety Program Plan) the AEC describes numerous experimental programs which are needed to answer some of the most fundamental questions about nuclear safety. Included are tests to determine if the emergency core cooling system will actually operate, to determine what are the effects of radiation on the strength of the reactor vessel, to determine the effectiveness of the containment spray system, to devise methods to control releases of noble gas fission products so that siting of plants in urban areas will be permissible, and the like.

Obviously this continued research and development is encouraging and reflects a deep concern by the AEC with the safety of nuclear reactors. Unfortunately this concern has not resulted in any attempt by the AEC to prevent location of nuclear reactors in areas where, in the event of a possible catastrophic accident, essentially unreliable and unproven engineered safety features are the sole method for protection of the public from exposure to radioactivity in excess of permissible levels. Indian Point, Unit No. 2 is an example of such a plant. It is located in an area of population considerably more dense than that postulated by the AEC when it analyzed the possible consequences of a severe nuclear accident in which 3,400 people would die, 43,000 would be injured and property damage would be \$5 billion. The Indian Point reactor is 60% larger than the reactor assumed in that accident analysis. While the probability of such an accident may be, in the opinion of some, quite low, the fact is that such an accident is not impossible and that the consequences of such an accident would be disastrous - so disastrous that it is unacceptable to subject the public to such a risk.

However, even if the projected low probabilities of risk were acceptable, the fact is that data upon which those low probabilities are based is inherently unreliable. Even the AEC recognizes this unreliability and seeks millions of dollars

of appropriations each year to continue research on plants such as Indian Point. Because of technical problems, substantial costs and inherent delays associated with actual experiments to test nuclear safety systems, much of the safety performance data is based upon mathematical approximations of physical events - events which are not fully understood by those preparing the mathematical studies. The admitted uncertainties in these mathematical simulations have prompted the use of so-called "design margins" and "conservative" assumptions. These phrases merely mean that where mathematical approximation is not reliable the power company will be required to design systems with projected levels of operation higher than those required by the mathematical models. The difficulty with this procedure is that frequently no one really knows the level of inaccuracy of the test and therefore no one knows how much of a safety margin is required.

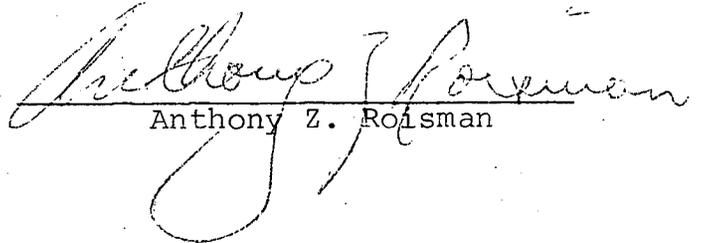
It is the position of the Citizens Committee on the Protection of the Environment that the Atomic Safety & Licensing Board should refuse to issue a license to operate Indian Point, Unit No. 2, 1) because the data presently available indicates that the consequence of a possible, albeit improbable accident, are too severe to permit public exposure to such a risk or

alternatively 2) because the data presently available is not sufficiently reliable to warrant a conclusion that the probability of such a catastrophic accident is at an acceptably low level. \*

Respectfully submitted,

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By

  
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\* Attached herewith is a statement of proposed factual findings with references to the data supporting these proposed findings.

June 3, 1971