

Scenic Hudson Preservation Conference

500 FIFTH AVENUE, SUITE 1625 • NEW YORK, N.Y. 10036 • 212 OXFORD 5-6204

Officers and Executive Board

- Carl Carmer, *Honorary Chairman*
- Alexander Saunders, *Chairman*
- Mrs. Willis Reese, *Co-Chairman*
- Robert H. Boyle, *Vice-Chairman*
- Mrs. Stephen P. Duggan, *Vice-Chairman*
- Benjamin W. Frazier, *Vice-Chairman*
- David Sive, *Vice-Chairman*
- Richard D. deRham, *Treasurer*
- Mrs. Carl S. Rowe, *Secretary*

June 12, 1972

Atomic Energy Commission
1717 H. Street, N.W.
Washington, D.C.

Mrs. Terry Rotola, *Executive Secretary*

- Stephen P. Duggan
- W. Barton Eddison
- James R. Hamilton
- Richard H. Pough
- Mrs. James J. Rorimer
- Miss Helen Lee Sherwood
- Chauncey Stillman
- Esty Stowell
- Mrs. Charles E. Tilton

Matter of Consolidated Edison
Company Indian Point Plant No. 2
Docket No. 50-247
Statement of Scenic Hudson Pre-
servation Conference

Rod Vandivert, *Environmental Consultant*

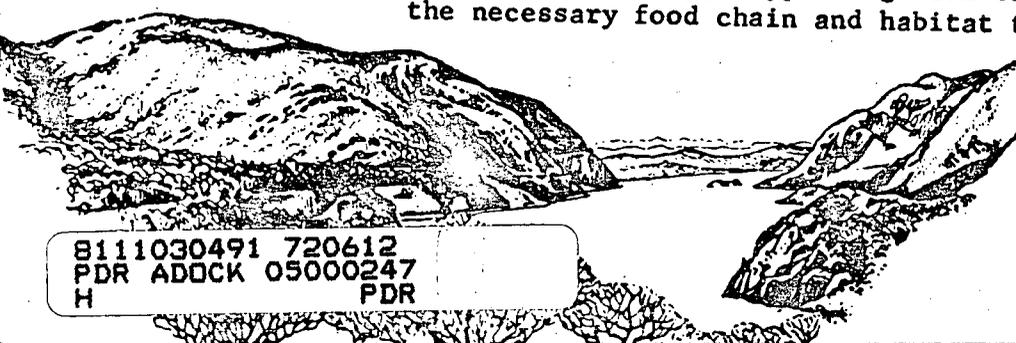
Advisory Committee

- Peter Blake
- Dr. Walter S. Boardman
- Jacques Ch. Boutinon
- Mrs. Marcella Brett
- Mrs. Jane Burdick
- James Cagney
- Charles H. Callison
- Mrs. Joan K. Davidson
- Mrs. J. Dennis Delafield
- Charles Eggert
- Robert A. Fox
- Mrs. Benjamin W. Frazier
- Mrs. R. Dana Gibson
- Mrs. Eliot D. Hawkins
- Dr. & Mrs. Albert R. Lamb, Jr.
- Irving Like
- Mrs. Cyrus McCormick
- Harry F. Nees
- Charles P. Noyes III
- Stewart M. Ogilvy
- Mrs. Antonio G. Olivieri
- Mrs. Stanley Plowden
- R. Watson Pomeroy
- Mrs. Robert L. Reed
- Mrs. John R. Reese
- Mrs. John Reurs
- Mrs. Nathaniel Roe
- Mrs. Raymond A. Ruge
- Mrs. Alexander Saunders
- Richard B. Sichel
- Cornelia Otis Skinner
- Mrs. Esty Stowell
- Lonsdale F. Stowell
- Miss Helen Thompson
- Maxwell C. Wheat, Jr.

This statement is submitted by Scenic Hudson Preservation Conference in connection with the current Atomic Safety and Licensing Board proceedings relating to Consolidated Edison Company's proposed Indian Point No. 2 nuclear power station. The statement is submitted because Scenic Hudson's name has apparently been interjected into the proceedings in a fashion which does not accurately reflect its views.

As is well known, Scenic Hudson has long been concerned with the environment and ecology of the Hudson River. In this connection, it has been especially concerned with (1) the scenic values of the Hudson, particularly as it flows through the Highlands a few miles north of Indian Point, and (2) the impact of power plants and other industrial installations on the fisheries resources and general water quality of the River. These are the areas of Scenic Hudson's expertise, and they define the scope of this statement. As to matters of nuclear safety, radioactive releases and the handling of radioactive wastes, Scenic Hudson has no special knowledge; and it neither endorses nor opposes the Indian Point plant on the basis of such consideration.

Scenic Hudson is, however, deeply concerned by the potential impact of the plant on the River's fisheries. In this regard, we point out that the Hudson has been and remains a highly productive estuary, supporting from 35 to 50 species of fish and the necessary food chain and habitat to make these species viable.



8111030491 720612
PDR ADDCK 05000247
H PDR



- 2 -

Within the entire range of fisheries, each species has both commercial and recreational importance in that each is part of a complex and interrelated biological system which supports fish for Hudson River sportsmen and for sport and commercial fisheries in offshore waters for several surrounding states, each with an important marine economy. Any serious damage to the fishery can be the basis of permanent and irrevocable damage to the River and a broad segment of the population of the Middle Atlantic region, relying on the estuary or its productivity for recreation or for income.

Our concern over the Indian Point plants stems from the fact that the waters of the Hudson are or will be drawn upon for cooling purposes, and that the intake of water, combined with mechanical abrasion and thermal discharges, appears to threaten the River's fisheries with major damage. We understand, for example, that with the open cooling system that it utilizes, Indian Point No. 1 draws up to 300,000 gallons per minute of River water for cooling, and further, that approximately 840,000 gallons per minute would be drawn by Indian Point No. 2, utilizing a similar open cooling system. Recent history in the testing of Indian Point No. 2, and the continuing problem related to fish kills at Indian Point No. 1, indicate that these withdrawals alone can be regarded as a major threat to marine life in the Hudson -- and an unnecessary threat since closed-cycle cooling is possible in today's technology.

The problems of the past in the operation of the Indian Point No. 1 plant have at times been related to thermal effects, and the most recent fish kills at Indian Point No. 2 have been attributed to mechanical problems having to do with intake. The numbers of fish killed or subject to future kills have been thoroughly covered by the Hudson River Fishermen's Association and the Atomic Energy Commission staff report. The net effect forecast by both as a result of the operation of the Indian Point No. 2 represents a serious loss to the fisheries of the Hudson. Contrary to the statements issued by Con Edison regarding size, species and survival, the mortality is important in that each marine organism is either a predator or a food for a predator -- hence part of the cycle which cannot reasonably be sacrificed; nor can it be reasonably tolerated in the face of an alternative method of cooling that is clearly available.

This alternative method of cooling is, of course, closed cycle cooling. As applied to Indian Point, this would probably involve cooling towers; and it is in this connection that Scenic Hudson's name has apparently been interjected into the proceeding -- it being suggested that we would never stand for cooling towers on the grounds of esthetic objections. This misrepresents our position.

Scenic Hudson is deeply concerned with scenic values along the Hudson and, as such, it vigorously opposes the use of cooling towers (and, for that matter, the construction of power plants altogether), where special scenic qualities are involved. But Indian Point, as it presently stands is not such a case. The site has already been despoiled by Indian Point No. 1 unit and

- 3 -

its high stack; by the completed plant structures of Indian Point No. 2; by the hulk of Indian Point No. 3 as it nears completion; by the huge towers and supported wires which cross the Hudson at this point; and by the general maze of transmission towers and wires which serve as a back drop for the plants.

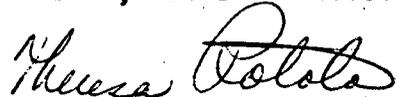
Under the foregoing circumstances, the addition of cooling towers at Indian Point, while no esthetic enhancement, will hardly result in irrevocable scenic damage since the damage has already been done by the vast industrial complex which already exists there. On the other hand, the addition of cooling towers and a closed cycle cooling system would provide at least some protection for the fisheries of the Hudson and, as a consequence, and under the circumstances described, is clearly to be preferred to the open cycle system currently proposed by Con Edison.

We do not mean to suggest, however, that cooling towers and closed cycle cooling are a complete answer to the dangers threatened to the fisheries. In this regard, it is our belief that any analysis of the damage to fisheries resources must be related in measurement to the operation of all plants now existing or under construction within the spawning and nursery areas of striped bass and other Hudson River fish.

Furthermore, there are many other users of Hudson River water within immediate and nearby areas. No meaningful evaluation can be drawn without a consideration of the impact on the entire Hudson River fishery of the total of its water users. Single project or plant projections tend to be totally self-serving for the applicant or for the licensing agency and can in no way indicate the point at which the River will be unable to support a continuing and surviving production.

Equally unsatisfactory is any offer to produce a hatchery to replace mortalities since many of the species subject to impingement or thermal effect have never been successfully produced under controlled conditions; and certainly there is no history of success in the replacement of these species in an estuarine environment. Therefore, any such offer, no matter how sincerely made, must be considered simply good public relations.

Respectfully submitted
SCENIC HUDSON PRESERVATION
CONFERENCE
500 Fifth Avenue, Suite 1625
New York, New York 10036



By: Mrs. Theresa Rotola
Executive Secretary

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

Reg. Files

In the Matter of)
)

CONSOLIDATED EDISON COMPANY)
OF NEW YORK, INC.)
(Indian Point Nuclear)
Generating Unit No. 2))
)

Docket No. 50-247

CERTIFICATE OF SERVICE

I hereby certify that copies of letter from Mrs. Theresa Rotola, Executive Secretary of the Scenic Hudson Preservation Conference, dated June 12, 1972, to the Atomic Energy Commission re Hudson fisheries, in the captioned matter have been served on the following by deposit in the United States mail, first class or air mail, this 16th day of June 1972:

Samuel W. Jensch, Esq., Chairman
Atomic Safety and Licensing Board
U. S. Atomic Energy Commission
Washington, D. C. 20545

Gerard A. Maher, Esq.
LeBoeuf, Lamb, Leiby and MacRae
One Chase Manhattan Plaza
New York, New York 10005

Mr. R. B. Briggs, Associate
Director
Molten-Salt Reactor Program
Oak Ridge National Laboratory
P. O. Box Y
Oak Ridge, Tennessee 37830

Edward J. Sack, Esq.
4 Irving Place
New York, New York 10003

Dr. John C. Geyer, Chairman
Department of Geography and
Environmental Engineering
The Johns Hopkins University
Baltimore, Maryland 21218

Honorable William J. Burke
Mayor, Village of Buchanan
188 Westchester Avenue
Buchanan, New York 10511

Dr. Walter H. Jordan
Senior Research Adviser
Oak Ridge National Laboratory
P. O. Box X
Oak Ridge, Tennessee 37830

Commissioner of Commerce
State Department of Commerce
112 State Street
Albany, New York 12207

Myron Karman, Esq.
Mary Thorkelson, Esq.
Regulatory Staff Counsel
U. S. Atomic Energy Commission
Washington, D. C. 20545

Honorable Louis J. Lefkowitz
Attorney General, State of
New York
80 Centre Street
New York, New York 10013

Arvin E. Upton, Esq.
Leonard M. Trosten, Esq.
Lex K. Larson, Esq.
LeBoeuf, Lam, Leiby and MacRae
1821 Jefferson Place, N. W.
Washington, D. C. 20036

Honorable Paul S. Shemin
Assistant Attorney General
State of New York
80 Centre Street
New York, New York 10013

Bruce L. Martin, Esq.
New York State Atomic Energy
Council
State Department of Commerce
112 State Street
Albany, New York 12207

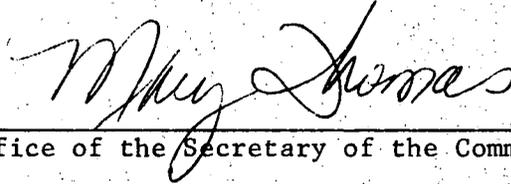
J. Bruce MacDonald, Esq.
New York State Atomic Energy
Council
State Department of Commerce
112 State Street
Albany, New York 12207

Mr. Robert H. Boyle, Director
Hudson River Fishermen's
Association
P. O. Box 725
Ossining, New York 10562

Dominick J. Pirone, Consulting
Biologist
480 Tuckahoe Road
Yonkers, New York 10710

Angus Macbeth, Esq.
Richard M. Hall, Esq.
36 West 44th Street
New York, New York 10036

Anthony Z. Roisman, Esq.
Berlin, Roisman and Kessler
1712 N Street, N. W., 4th Floor
Washington, D. C. 20036



Mary Thomas

Office of the Secretary of the Commission

cc: Mr. Jensch
Mr. Karman
AS&LBP
Ms. Brown
Reg. Files