

63 WALL STREET
NEW YORK

June 1, 1972

Atomic Energy Commission
1717 H Street, N.W.
Washington, D. C. 20545

Re: Petition of Consolidated Edison
Company of New York to allow
operation of its Indian Point
Number 2 facility.
Docket No. 50-247

Dear Sirs:

This letter of comment respecting the above facility is submitted in response to your request for comments and in my capacity as the Democratic nominee for Representative in Congress from the new 25th Congressional District of New York in which the above facility is situated.

The above application should be denied subject to the condition that it be reconsidered upon Consolidated Edison's undertaking to install and operate appropriate facilities to cool its cooling waters prior to returning them to the Hudson River and to minimize the quantity of these waters to be returned to the Hudson. This action should be taken because:

- (1) The immediate licensing of this facility will not solve any imperative power needs;
- (2) The proposed thermal discharges pose a serious threat to the quality of the Hudson and to its water life;
- (3) Inadequate consideration has been given to the impact upon the quality of the Hudson and upon its water life of the proposed discharge and other existing thermal discharges into the Hudson; and

(4) Appropriate cooling facilities can be installed without violating reasonable esthetic standards and without undue expense.

(1) The immediate licensing of this facility will not solve any imperative power needs. Consolidated Edison's proposed testing schedule indicates that it does not intend to use this facility to provide power during the summer of 1972. Since Consolidated Edison now has a 35% reserve capacity over anticipated winter peak load, there is no urgent need to operate this facility before adequate consideration has been given to the threats posed to the Hudson by its proposed operation.

(2) The proposed thermal discharges pose a serious threat to the quality of the Hudson and to its water life. The proposed facility will withdraw from the Hudson between one-half million and one million gallons of water per minute, heat it approximately 15°F, and discharge it into the Hudson.

The discharge of this heated water will remove substantial dissolved oxygen and may cause increased evaporation leading to sedimentation. This thermal discharge will diminish the capacity of the Hudson to assimilate other wastes presently discharged in undue quantities into the Hudson and increase the toxic effects of pollutants presently in these waters.

The thermal discharge will have the effect of altering diet, reproductive activities, disease resistance, migration patterns and other considerations affecting the life cycle of the various species of fish now found in abundance in the Hudson. The effect may be to wipe out entire species of fish.

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Even fish species which adjust to the new temperatures of the Hudson to be created by the intended thermal discharge can be destroyed in the event that a failure of operation of this facility results in a sudden decrease in water temperature.

Moreover, it is to be anticipated that substantial numbers of fish will be entrained and killed upon screening equipment during the intake of water from the Hudson by this facility. During one test day last February, approximately 150,000 fish were killed when just two of the six proposed pumps of this facility were put through a test run. Qualified scientists estimate that the operation of this facility may destroy 25% of the fish in the Hudson per year. If such destruction continues over a number of years at this annual rate, it is obvious that the number of fish in the Hudson would quickly approach zero.

(3) Inadequate consideration has been given to the impact upon the quality of the Hudson and upon its water life of the proposed discharge and other existing thermal discharges into the Hudson. The proposed facility and the nearby Indian Point Unit Number 1 will together withdraw 1,140,000 gallons of water per minute from the Hudson. Commencing in 1974, the proposed Bowline Point facilities will withdraw 768,000 gallons of water per minute from the Hudson, heat it to 13.5°F and discharge the heated water into the Hudson. These facilities are only 5 miles from the subject facility. Commencing in 1973, the proposed Roseton facilities will withdraw 650,000 gallons of water per minute from the Hudson, heat it to 15.4°F and discharge the heated water into the Hudson. These facilities are only 22 miles from the subject facility. There appears to have been no adequate investigation of the combined effect upon the Hudson of these numerous thermal discharges. Nor has there been any consideration of the numerous thermal discharges presently being made in this area of the Hudson.

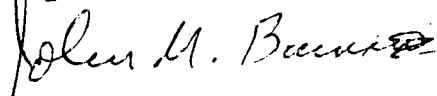
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(4) Appropriate cooling facilities can be installed without violating reasonable esthetic standards and without undue expense. I am advised that The Scenic Hudson Preservation Conference does not object on esthetic grounds to the installation of appropriate cooling towers. Compared to the costs of losing the present life in the Hudson, the cost of installing adequate cooling towers is minimal.

* * *

The obvious conclusion is that no permission should be granted to Consolidated Edison to operate the proposed facility until appropriate closed looped cooling towers have been installed and are in operation. Consolidated Edison should not be permitted to monitor the impact of its discharges upon the Hudson. The preservation of existing life in the Hudson and the future rehabilitation of the Hudson depend upon immediate steps to limit further intrusions into the Hudson of the type proposed in the present petition.

Very truly yours,


JOHN M. BURNS, III

Reg. Files

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)

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

Docket No. 50-247

6-1-72.

CERTIFICATE OF SERVICE

I hereby certify that copies of (1) letter of comment from Mr. John M. Burns, III to the Atomic Energy Commission dated June 1, 1972, and (2) letter from The Honorable William F. Ryan to Mr. McCool dated May 31, 1972, requesting reevaluation of the Draft Detailed Statement on the Environmental Considerations Related to the Proposed Issuance in the United States mail, first class or air mail, this 6th day of June 1972:

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