

NEWS

FROM: **SENATOR BERNARD G. GORDON**

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TESTIMONY

by

SENATOR BERNARD G. GORDON

before the

**ATOMIC SAFETY and LICENSING BOARD of the
NUCLEAR REGULATORY COMMISSION**

April 1, 1975

I appreciate the opportunity to submit this statement to the Nuclear Regulatory Commission concerning the very real fears and concerns that the people of the Hudson River Valley have relating to the planned construction of hideous and offensive water cooling towers at the site of Con Edison's atomic plants at Indian Point.

I also emphasize that I am absolutely convinced that I am expressing the opinion and viewpoint of the large majority of people who will be grievously and adversely affected by a Washington directive that will have such a catastrophic impact upon them.

It is my hope that the Commission will be able - - even at their considerable and comfortable distance from the effect of their ruling - - to revise its ill-conceived viewpoint toward more humane considerations.

Since the final environmental statement prepared by the N.R.C. considers the environmental impact from operation of all three reactors, I would like to direct my remarks to the N.R.C.'s decision to order a cooling tower for Plant #2, as well as to the operation of Plant #3.

It is most disheartening to recognize that the Commission is prepared to mandate not only a tower at Plant #2, but also at Plant #3. Indian Point

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can very well become known as the world's largest towering inferno, -- a most dubious distinction.

Exactly seven years ago, I publicly warned that the continued proliferation of atomic plants at Indian Point "must be weighed against the common welfare.

That premise still holds true today. The Commission's license provisions requiring cooling towers are an outrage to the people of the Hudson Valley and poses a clear danger to the health, welfare and livelihood of a quarter million -- and more -- people of Westchester, Orange, Putnam and Rockland counties.

Construction of two natural draft wet cooling towers, as approved by the Commission,¹ would, unquestionably, ruin the natural beauty of the Hudson Valley. These concrete towers would be over 560 feet high, over 300 feet across the top, and emit a plume of saline mist that would rise thousands of feet into the air and cover an area miles wide. They would be the tallest structures between New York City and Albany. While every subtle attempt has been made to minimize the other horrible consequences to the Hudson Valley which would result from construction of these towers, the N.R.C. report concluded:

"The staff recognizes that there is one impact of cooling towers that is not negligible; this is the visual insult of the towers themselves and, under certain meteorological conditions, the plumes from² the towers."

"Insult" is certainly the proper word for the order requiring a tower for Plant #2. But it is an insult that too greatly threatens the very existence of the people affected to be allowed to go uncorrected.

Economically, the cost of these towers will be added to the tremendous burden already borne by the Con Ed consumer. 489 million dollars, almost one-half billion dollars, is the estimated total revenue requirement over the life of the Plant for just one of these towers.³ And this amount will be added to the rate structure of Con Ed, whose customers already pay the

highest electric rates in the country!

Apart from the obvious aesthetic and economic reasons, human health and environmental considerations alone fully demonstrate the iniquity of constructing such towers. Never before in the world, to my knowledge, have such towers been constructed on an inland salt-water estuary. The millions of gallons of salt water mist which will be spewed daily from the top of these towers will kill plant life, block sunlight, create dangerous ice and fog at certain times, rust our automobiles and erode the very structure of our homes!

And - - I emphasize - - these are not just idle fears. Your own report says that this smog plume will create an artificial cloud cover blanketing an area having a radius of more than four miles, a possible diameter of more than eight miles and a fall-out affecting an area more than twenty miles wide. ⁴ The Con Ed environmental study concluded this saline mist could increase corrosion activity, stating:

"Metal, concrete, wood, painted and asphalt surfaces in the vicinity of the cooling tower may all present a potential for saline damage."⁵

Your study has concluded that these towers would drop almost 20 pounds of salt per acre each year in some areas, and deposit over 8 pounds each year in an area ten miles from the towers!⁶ The impact of this salt drift on plant life alone will be devastating.

The N.R.C. environmental study also concluded that these towers will cause fog.⁷ And your report states that:

"When temperatures are sufficiently low, cooling tower plumes can cause icing."

To these horrors must be added the cumulative effect we can expect from construction of two similar towers across the river at the Orange and Rockland Bowline plant, as required by a Federal Environmental Protection Administration ruling just a month ago.

Visual insult, salt deposits, fog, corrosion, icing, blockage of sunlight - -

these environmental catastrophes are all conceded as inevitable in the N.R.C. report. And yet the report concludes:

"In the judgement of the staff, this impact is acceptable, whereas the likely damage to striped bass is not."

I won't accept - - nor will the people accept - - such a callous, indifferent and absurd conclusion!

The fact that such conclusion is not based on sound information regarding the impact of the products of the towers, namely, ice and plumes, rests uneasy upon us, particularly since your own study determines that:

"No quantitative method of predicting these situations are generally accepted."

Relative to the killing of plant life, the report points out that:

"Unfortunately, the effects of aerial salt impaction upon plant species in areas removed from the influence of coastal salt spray have received little study."

Unfortunate indeed! Not for the Commission members, but for those of us who live here and who will be so gravely affected. And, incidentally, no consideration at all was given in your report of the effect of additional salt, mist, ice, fog and corrosion from the towers now mandated for across the river.

In the name of environmental conservation this Commission, after inadequate study and with limited foresight, seeks to condemn the people of this area to live in a smog-shrouded wasteland. I intend to do everything in my power to prevent this from happening.

If the total isolation of this Commission from the concerns of the people who live and work in this area is not yet clear, one final quote from your staff report ends all doubt:

"From the analysis of alternative cooling systems, the staff believes that additional information of

impacts of such systems should be obtained. As predictions of minimal vegetation damage were based upon calculated drift deposition rates, which have not been verified, the staff requires that upon completion of the construction of the cooling towers the applicant should establish a series of permanent plots at strategic locations..... In the event that major vegetation damage is observed (e.g., extensive defoliation, dieback of trees and ornamentals on adjacent properties, decline of screening vegetation, etc.), it is recommended that appropriate steps be taken....."¹²

The Commission has the temerity to order the building and operation of these monstrous towers - - and they tell us that if the countryside rots in the process, we'll worry about it then! They're putting the cart before the horse - - and they are also placing the value of aquatic life before that of human life. I urge you to rescind your order requiring cooling towers for Plant #2 and I urge you to not require a tower for Plant #3.

I intend to vigorously pursue passage of legislation that I have already introduced in Albany to require our State agencies - the Public Service Commission, Environmental Conservation Department and others to study and mandate approval of all plans for these towers before construction can be started.

I emphasize, too, that I appreciate and understand the problems relating to the environment of the Hudson River and the desire to properly regulate such factors. I have addressed myself only to some objections. It is certainly proper to consider alternatives. I have not been able to conclude as to the best methods of approach although I believe that several addressing you today will be offering solutions. I am aware, too, that the Commission has considered other approaches and they should be fully explored.

However, frightening towers and their calamitous impact are not the answer.

There must be a better way - - and it must be found.

Footnotes

1. Final Environmental Statement, February, 1975, United States Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Summary and Conclusions, p. xii.
2. Ibid, Ch. XII - 90.
3. Ibid, Appendix G-23.
4. Ibid, Appendix G-6.
5. Economic and Environmental Impacts of Alternate Closed-Cycle Cooling Systems, December 1, 1974, Consolidated Edison Company, p. 6-34.
6. N.R.C. Report, supra, Appendix G-3.
7. Ibid, Appendix G-7.
8. Same as 7.
9. Ibid, Ch. XII - 90.
10. Ibid, Appendix G-7.
11. Ibid, Ch. XI - 22.
12. Ibid, Ch. XI - 52.

FROM: Mr. Emilson Fish		ACTION CONTROL DATES		CONTROL NO. 265	
		COMPL DEADLINE 5/4/76		DATE OF DOCUMENT 5/12/76	
		ACKNOWLEDGMENT			
		INTERIM REPLY			
TO: Chairman Anders		FINAL REPLY		PREPARE FOR SIGNATURE OF: <input type="checkbox"/> CHAIRMAN <input type="checkbox"/> EXECUTIVE DIRECTOR OTHER: Unkred	
		FILE LOCATION			
DESCRIPTION <input checked="" type="checkbox"/> LETTER <input type="checkbox"/> MEMO <input type="checkbox"/> REPORT <input type="checkbox"/> OTHER		SPECIAL INSTRUCTIONS OR REMARKS			
Draft Environmental Statement on Closed Cycle Cooling System for Indian Point No. 2 and completion of study of fish in the Hudson River		Send copy of response to BSS			
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DOCUMENT/COPY NO.		CLASSIFICATION			
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No. 76- 1607

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NRC SECRETARIAT

- TO: Commissioner _____ Date _____
- Exec. Dir./Oper. _____ Gen. Counsel _____
- Cong. Liaison _____ Solicitor _____
- Public Affairs _____ Secretary _____
- _____

Incoming: Hamilton Fish, Jr., H.R.

From: _____

To: Chairman Anders Date 4/12/76

Subject: Recommending delay of environmental statement at Indian Pt. No.2 until study of fish in Hudson River is complete.

- Prepare reply for signature of:
- Chairman _____
- Commissioner _____
- EDO, GC, CL, SOL, PA, SECY SUSPENSE: May 4
- Signature block omitted
- _____
- Return original of incoming with response

- For direct reply*
- For appropriate action
- For information
- For recommendation

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 Time 9:12

Remarks: Cy of incoming to OGC, ~~SECRETARY~~, PE, PA, OCA. OCA to acknowledge. LOGGED EX! PART

Original to Pocket-File. Send cy of response to MSS.

For the Commission: White

*Send three (3) copies of reply to Secy Mail Facility

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