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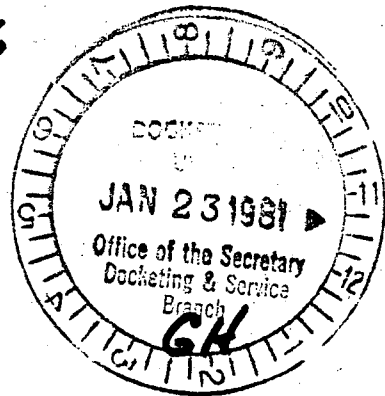
# NEW YORK PUBLIC INTEREST RESEARCH GROUP, INC.

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DOCKET NUMBER 50-247/286  
PROD. & UTIL. FAC.

Docketing and Service Branch  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



LATE FILING OF REQUEST FOR HEARING

Dear Sir/Madam:

The issue of compaction of the spent fuel pool at Indian Point #2 deserves further public attention than it has received since Consolidated Edison applied for it in January, 1980. Several factors support this view:

a) The potential for an accident more severe than a reactor meltdown should be examined due to the much shorter period needed for boil-off of sufficient cooling fluid when fuel is highly compacted. If the cooling systems serving the spent fuel pool should break down due to a loss of fuel to emergency generators, a possibility resulting from a meltdown, then the cooling water would boil off in a few days yielding uncovered rods, some of which could burst from internal heating and release particles and gases beyond the capacity of the pool's air handling filtration systems to contain. An extended power failure could remain undetected in the aftermath of an evacuation. The power failure at Three Mile Island and the later difficulty in securing entry have provided reason for concern that access and service during an accident could be sufficiently impaired to result in a significant complication at the spent fuel pool.

b) While a doubling of spent fuel density has been examined in NUREG-0575, a quadrupling of fuel density (relative to its design density) -- with its attendant reduction of cooling fluid volume, increase in cooling load, increase in radioactive gas concentration, and reduction in warning time before damage occurs to stored fuel -- has not been specifically examined in any report of which we are aware.

c) The Indian Point complex is near a major commercial fishing ground that could be severely impacted by a fluid leakage from a tightly compacted pool potentially having a higher concentration of fission products than usually exists at such a facility.

d) Other alternatives which might provide safer options, such as construction of new pools or dry storage of fuel, were not examined in Con Edison's application and should be addressed in a hearing.

e) When fully examined in other countries, compacted storage has been denied by at least one regulatory agency (the Federal Republic of Germany denied permission at the Gorleben facility in 1979) and there is a need to air such a discussion as it applies to Indian Point #2.

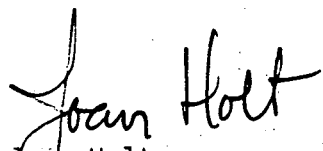
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Acknowledged by, dated 1/23/81

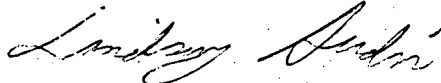
We understand that a solicitation of public comment on Con Edison's application for amendment to its operating license was published in the Federal Register last summer. Even though we monitor the operations at Indian Point as best we can, we failed to spot this Notice, and have since learned that there was no public response or any request for a hearing at that time. Considering the enormity of the consequences that could occur in connection with any serious accident at Indian Point, and the attention now being focused by the Commission on all matters relating to that site -- in particular, the recently ordered Licensing Board adjudicatory hearings -- it would be extremely ill-advised for the Commission to permit Con Edison further compaction without any public hearings on the matter. We believe that it is essential that hearings be conducted and urge you to institute them in the public interest. Expeditious hearings should not create any problems since it is our understanding that staff does not expect to rule on this matter for some time.

We ask you to waive the filing deadline in order to consider our request at this time.

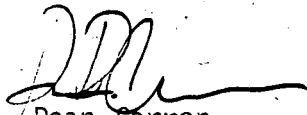
Respectfully submitted,



Joan Holt  
New York Public Interest  
Research Group, Inc.



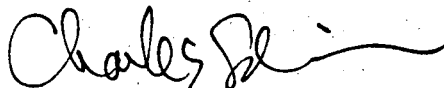
Lindsay Audin  
The Citizens' Institute for  
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January 19, 1981

\* Organization listed for identification only