

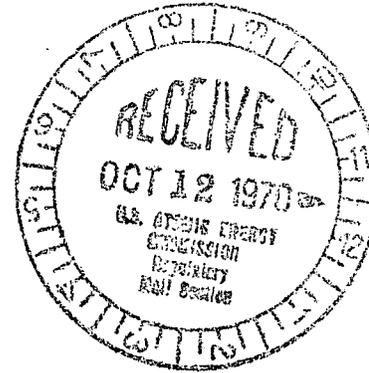


United States Department of the Interior

Regulatory File Cy. 50-247

OFFICE OF THE SECRETARY  
WASHINGTON, D.C. 20240

October 9, 1970



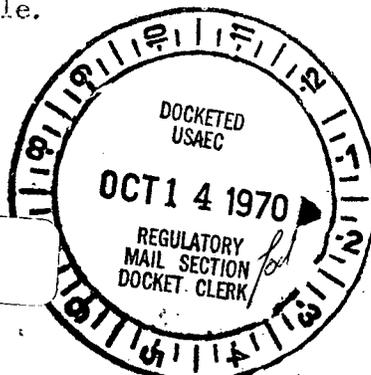
Dear Mr. Price:

This is in response to your letter of August 17, transmitting the draft environmental statement prepared by the Consolidated Edison Company of New York, Inc. for the Indian Point Nuclear Generating Station Unit 2, AEC Docket: 50-247. We have reviewed the statement and other material available on the project and offer the following comments for your consideration.

Consolidated Edison Indian Point Unit No. 2 was licensed for construction by the Atomic Energy Commission in 1966, three years before the National Environmental Policy Act of 1969 was enacted. The subject statement was prepared in response to the Company's request of AEC for an operating license. Construction of Unit 2 is almost complete and is scheduled to go into operation in June 1971. Consequently, most of the environmental effects of construction have occurred so our concern is mostly with plant operation. Indian Point Unit No. 1 is in operation and the construction license application for Unit No. 3 is pending.

We are pleased that the applicant has made a firm commitment in its environmental statement to incorporate tapered steel poles for transmitting power from Unit No. 2 to the Buchanan substation, increased development of the 80 acre forested area and small lake for public recreation, the 2,000 foot marked hiking trail, and an expanded visitor center. We recognize Consolidated Edison Company's effort at the Indian Point site to provide public recreation and hope that its public use plans will be finalized and fully implemented at the earliest possible time.

We are also aware of the cooperative effort the applicant is making to solve the fishery problems resulting from the operation of the present facility. Their support of studies to solve these problems is commendable.



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The draft environmental statement provides in detail information relative to most of the issues set forth in Section 102(2)(C) of the National Environmental Policy Act of 1969. We offer the following comments for use in completing this statement:

1. We believe it premature for the applicant to conclude (pages 33 and 34) that on the basis of investigations and studies conducted to date that Unit No. 2 will have no significant adverse impact on the ecology of the Hudson River.

Fish kills in the vicinity of Unit No. 1 were covered extensively in the Statement. Considerable difficulty has been experienced with fish being impinged on cooling water intake screens and the company acknowledges that fish protection at the cooling water intake facilities could be a continuing problem. A problem also exists when small organisms, plankton and fish eggs and larvae are carried through the system with cooling water heated significantly before being discharged. Studies to solve these problems are not completed. It would be better to wait until they are completed and new intake facilities built and tested before such a statement would have validity. Unit No. 2 operated independently may have no impact but there may be an accumulative effect from the three units.

2. Additional information should be included on cost and effects of possible alternative measures and supplementary facilities to alleviate the problems similar to those experienced in the operation of Unit No. 1. Information should also be included on the observational programs established to monitor the effectiveness of waste controls, thermal discharges, and chemical releases.

3. The environmental statement should describe the volumes of fresh water flowing past the plant and the interaction of fresh water flows with tidal flows. The statement that 80 million gallons of water per minute flow past the plant during peak tidal flow is misleading.

4. The Company acknowledged the fact that fish protection at the cooling water intake facilities could be a continuing problem. The statement should note that other problems could arise in connection with the radioactive, thermal, and chemical waste control facilities of the units. With the establishment of more stringent water quality

standards or as a result of the environmental surveys and monitoring and sampling programs, it may be necessary to incorporate alternate or additional waste control measures. For these reasons, the processes must provide sufficient flexibility that additional controls can be added if later found to be needed.

5. The identified monitoring programs and studies were of the type that are necessary to adequately apprise the effect of the Plant's operation on the environment. The statement should include information on the locations of monitoring stations (identifying them on a sketch or map) and the frequency of sampling for the various parameters.
6. The Company has stated that water quality standards will be met, the environment in the vicinity of the Plant will be protected, and there will be continuing radiological, biological, thermal, and chemical studies and surveys to verify these commitments. To confirm this, other data such as the following will need to be presented: maximum temperatures and temperature rises in the receiving waters, mixing zone size, evaporative losses, and equilibrium temperatures. Critical years of extreme meteorological conditions and minimum river flows should be considered in determining the effects of the Plant's operation on water quality and the environment. Information (including procedures, environmental concentrations, and effects on biota) should be presented on condenser cleaning practices and other uses of chemicals in which the Company will be involved.
7. The draft statement does not discuss the hypothetical accidental escape of radionuclides from the reactor. Of particular significance at this site would be a catastrophic accident in which long-lived radionuclides from the core would vaporize and escape the containment structure to the atmosphere. The site location in the deeply incised Hudson River Valley north of the broad reach including Tappan Zee, would favor subsequent deposition or rainout of these radionuclides directly into the river. Unless the accidental escape of long-lived radionuclides from the reactor core can be ruled out as impossible, an analysis of the consequences of such a catastrophic accident should include consideration of its effects on the Hudson River estuary and the New York bight.

We appreciate the opportunity of commenting upon this statement.

Sincerely yours,



Assistant to the Secretary  
for Policy Planning and  
Research

Mr. Harold L. Price  
Director of Regulation  
Atomic Energy Commission  
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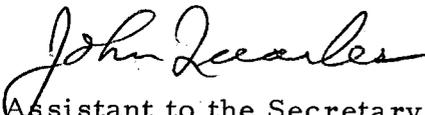
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U.S. ATOMIC ENERGY COMMISSION  
Regulatory Branch Section

10/12/70  
U.S. ATOMIC ENERGY COMMISSION  
Regulatory Branch Section

U.S. ATOMIC ENERGY COMMISSION  
Regulatory Branch Section

US Department of the Interior  
 Washington, D. C. 20240  
 John R. Quarles, Jr.

10-9-70	10-12-70	
LTR: <input checked="" type="checkbox"/>	MEMO:	PORT: OTHER:
ORIG.: 1	CC: 1	OTHER:
ACTION NECESSARY <input type="checkbox"/>	CONCURRENCE <input type="checkbox"/>	DATE ANSWERED:
NO ACTION NECESSARY <input type="checkbox"/>	COMMENT <input type="checkbox"/>	BY:
CLASSIF: U	POST OFFICE	REG. NO:
DESCRIPTION: (Must Be Unclassified)		
Ltr re our 8-17-70 ltr...submitting comments on Con Ed's Indian Point # 2 Enviro Statement.....		
ENCLOSURES:	FILE CODE: 50-247 (ENVIRO FILE)	
	REFERRED TO	DATE RECEIVED BY DATE
	Muller/Blunt W/4 cys for ACTION	10-12-70 (Orig for MATS)(Orig to be returned to 016)
	<b>DISTRIBUTION:</b>	
	Regulatory File AEC PDR	
	Compliance (2)(Low) Henderson	
	Felton Shapar(OGC, Rm P 506A)	
	DiNunno	
	Boyd	
	DeYoung	
	E. Price, SLR	
	N. Dube	
	P. Howe (2)	
	Morris/Schroeder	

TO: Harold L. Price

CLASSIF: U POST OFFICE REG. NO:

DESCRIPTION: (Must Be Unclassified)  
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ENCLOSURES:

REMARKS:

**DO NOT REMOVE  
 ACKNOWLEDGED**