

Regulatory Docket File

CITY OF PEEKSKILL CITY HALL

PEEKSKILL, N. Y. 10566

April 20, 1976



APR 23 1975 A

U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

Attention: Director, Division of Site Safety and Environmental

Re: Draft Environmental Statement for Selection of the Preferred Closed Cycle Cooling System at Indian Point Unit No. 2, Docket No. 50-247

Gentlemen:

As Mayor of the City of Peekskill, I am in strong disagreement with the recommendation of the Nuclear Regulatory Commission that natural draft cooling towers, as proposed by Con Edison, be constructed at Indian Point. I feel that insufficient consideration has been given to the quality of life of those people living in close proximity to the site as well as to the social and economic needs, both present and future, of the Peekskill community. I, therefore, oppose the construction of natural draft cooling towers and recommend that you reconsider your findings and dedicate time to searching for new and positive means of dealing with the problem of waste heat at Indian Point.

The City of Peekskill, located directly north of the Consolidated Edison Nuclear Power Plant at Indian Point, is a small urban center with a population of 20,000. In recent years the City has made a concerted effort to reverse a trend towards deterioration and blight common to many older cities, especially along the Hudson River Valley. We are very proud of the progress we have made in this direction. Today, with the assistance of 30 million dollars in Federal and State funding and the resulting private investments this public money has encouraged in our community, there are few, if any, lingering signs of blight in Peekskill and new development, showing confidence in the future, is evident throughout our 4½ square miles. This job is far from done however, and there remain many new developments which the City is attempting to attract to expand its economic base and housing inventory.

Of course, much of this progress is a result of the support given to Peekskill by the Federal and State governments as well as our own goals and efforts to rebuild our community. However, of equal importance has been the physical setting with which Peekskill is gifted. We are located approximately 45 miles north of New York Gity with excellent road and rail connections to Manhattan. We are also located on the eastern shore of the Hudson River with a picturesque panorama of the Palisades Interstate Park system located opposite the Peekskill Bay and with a varied topography offering many advantageous views. Many parcels for which development interest has been shown are strategically located in our upland and waterfront areas offering exciting views of the Hudson River Valley. We have found such locations have attracted many prime developers interested in constructing new residential and related development designed to take full advantage of the scenic setting possible from these sites.

Without these scenic attributes, Peekskill would probably be just another small urban center and in a much less competitive situation to attract developers. We, therefore, are in great fear of the construction of a closed-cycle cooling system using natural draft cooling towers for Indian Point Unit No. 2. The scale and drift of this proposed tower will have a disastrous impact upon the beauty of this valley, a quality which Peekskill has been able to and hopes to continue to be able to take full advantage of, to improve the quality of life for our community and to build a stronger economic base for the future. Many new developments have been constructed and, as stated before, many more are planned. This trend has been most exciting for Peekskill; however, if the attribute of our scenic location in the Hudson Valley is negated, we foresee that this positive growth will be reversed.

Of special import to the future of the City of Peekskill is its waterfront which is largely City-owned and for which we have planned ambitious and exciting projects. This development is mentioned briefly in the Draft Environmental Statement, Docket #50-247 (6-29, 32, 35, 36, 52). We are a landlocked community with no possible options for expansion and therefore must make full and complete use of our limited land area. The cooling tower being proposed for Indian Point Unit No. 2 would seriously detract from this area and therefore curtail our options for future growth.

Much of our interest in the waterfront area is directed to those parcels in private ownership which we anticipated would be upgraded as a result of public improvement in the Bay area. There is sufficient land in proximity to the waterfront to attract private dollars for new residential/commercial development. Of special note in this area has been the future of the land now owned and used by Standard Brands/Fleischmann Products, Inc. should, in the long term, their operation be reduced or removed from its present site (the Fleischmann Brewery has already moved its Peekskill facility to a New Jersey plant and many structures on the site have been demolished and cleared). Serious consideration is being given in our long range planning proposals for the waterfront area to the redevelopment of this land for luxury residential/marina development use due to its strategic location and setting. With the construction of the proposed cooling tower at Indian Point, directly adjacent to the Standard Brands property, this option for development would be seriously limited or even cancelled.

Therefore, as a result of the proposed construction of a cooling tower, we are being forced to redirect much of our upcoming planning efforts, funded with a Federal H.U.D. 701 Comprehensive Planning Assistance grant, to step backwards and reconsider alternate and less desirable uses for the Peekskill waterfront and upland areas, because of the anticipated impact of the scale and drift of these cooling towers.

I would also like to make note of the impact that such a tower would probably have upon the residents of my community. The scale proposed for the tower is unknown in northern Westchester County and being a part of a nuclear power generating plant, the safety of which has been seriously questioned as of late (geological as well as nuclear safety concerns), would stigmatize our community as being near a possible "doomsday machine" and thereby have serious psychological effect on our residents both present and future. This, of course, is in addition to the drift from this tower which would be a saline mist unlike that from other existing cooling towers. The drift, aside from having an effect on the physical environment and its biota as mentioned in your report, would, in addition, add to the humidity which is already intense during the summer months, perhaps endangering the health of those people with asthmatic or respiratory ailments. I would like to here add that Peekskill has just finished completion of approximately 300 housing units for Senior Citizens (funded by various New York State and Federal agencies) which have been designed to take advantage of the views of the River so that the effect on these people would be compounded.

I realize that the findings of this report state that the effect of the installation of gigantic cooling towers would be minimal or even negligible, however I also realize that your request for a monitoring program (p. iv) to determine the significance of drift and salt disposition, after construction of said tower, indicates that you question the possible validity of the findings of this report. Our concerns about the proposed cooling towers are both many and, in our estimation, quite serious, with imminent impact upon the City's future, and should not be subject to speculation. The needs of residents and the future of our community should also be evaluated with the same intensive scrutiny and sensitivity given to the natural environment. Our plight becomes even more serious if we project to the future and realize that, if the proposed cooling tower for Indian Point Unit No. 2 is constructed, a similar system will probably be installed for the other large reactors located at this site, therefore, further compounding its impact on our community.

With a national prohibition of open cooling systems by the Nuclear Regulatory Commission, what happens at Indian Point will also decide the future fate of many other nuclear power plants and their neighboring communities. I strongly feel that the serious questions being raised at Indian Point, as well as the importance of nuclear power to the future of our country, warrants considerable attention. We should move quickly and use our nation's sophisticated inventory of technological talent to explore "new" means of dealing with the problem of surplus waste heat from nuclear power production, rather than just itemizing the cost benefits of older and perhaps now outdated methods of treating this problem, as was done in the Draft Environmental Statement, Docket No. 50-247.

We, in the City of Peekskill, with a grant from the National Endowment for the Arts, have undertaken an exploratory study in this area and have found that many imaginative options are available and many more could be realized if a concerted effort were directed toward this topic. I therefore urge the Nuclear Regulatory Commission to support efforts toward the formulation of new and productive methods of dealing with the problem of waste heat.

In our energy conscious times this by-product of nuclear power production should not be interpreted as a problem or a waste production, but instead as a recyclable source of energy allowing us to make better and more efficient use of our natural resources.

Concerning the short term problem at hand, I question the cursory discussion given to spray ponds, especially powered spray modules, as a means of dissipating this waste heat in a closed system. The report states that there is not sufficient land area in proximity to Indian Point for this system to be implemented. My staff, in exploring this statement, has informed me that there exists a large tract of land (122 acres) to the south of the nuclear reactors to which Con Edison has access and which could accommodate spray ponds. In my layman opinion, spray ponds would more than fulfill the requirements for a closed cooling system yet would engender far fewer negative impacts upon the environment and our community.

I also question the dismissal of wet/dry mechanical draft towers or the circular mechanical draft towers as a possible solution. These, with the possible exception of noise, would impinge less upon our City than the recommended natural draft tower and we feel modifications could be made in the tower design to reduce this noise factor allowing for a system which might be able to stand as a possible secondary compromise solution to this serious problem. Of course, the expense involved in this particular solution would be perhaps higher than that of the draft cooling towers preferred by Con Edison, however, considering the negative external economy created by this tower and borne by our community, as well as the national interest in power production, this seems over the long run to be a justifiable investment as would the aforementioned research concerning alternate new means of dealing with this "waste heat".

I therefore strongly oppose the construction of natural draft cooling tower(s) and urge you to reconsider the findings of your report and your recommendation to support Con Edison's suggested solution. I feel proper consideration has not been given to the many people who live in adjacent communities and to the possible disastrous esthetic <u>and</u> economic effect on our City's present and future development.

I thank you for your attention in this matter and look forward to your response to the aforementioned points. I also invite you to visit us in Peekskill to discuss this problem in greater detail.

red / Biznco, Jr.

Mayor