

Regulatory

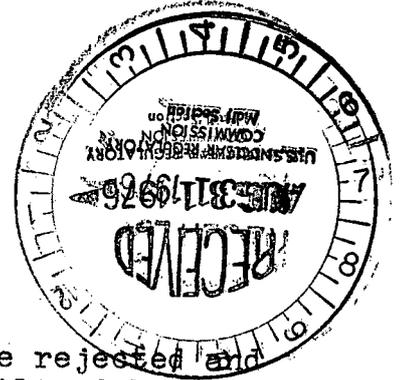
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Aug. 29, 1976

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attn: Director Division of Site Safety and Environmental Analysis

Re: Docket No. 50-247 (Indian Point)



Dear Sir:

We urge that the "Draft Environmental Statement" be rejected and no extension of time be granted for the reasons outlined below:

1. 1974 was the first year of full operation of Indian Point No. 2. Concomitant with this was the drastic reduction in the survival of striped bass at the juvenal stage. (Table B-1, 1973 and Table B-4, 1974, appendix B)

Year	Ichthyoplankton Gear	Beach Seine
1973	15,880,690	8,245,256
1974	4,053,956	2,415,500

This indicates approximately 75% reduction in survival of juvenals. There is no information given that would indicate any other environmental changes to account for the drop.

2. Staff's curve (Fig. 3-1) of "Relative Yield" confirms the drastic drop in survival. It further indicates that even after cessation of once through cooling the decline will continue. This indicates to us an irreversible process.

It appears that once through cooling should be stopped at the earliest possible time before the bass population is decimated.

3. On page 5-1 under "Alternatives", in the last paragraph, there are two questionable statements:

(a) "----the higher cost of power from oil fired plants as compared to nuclear plants." This certainly is not an established fact. The N. Y. State Public Service Commission is currently holding extended hearings on this very subject (Case 26974).

(b) "It would also be difficult to replace this power -----." This is nonsense. Con Ed in their present rate case is asking for a rate increase, in part, due to a drop in demand due to transfer of part of their load to the Power Authority of the State of New York and because of failure of load to grow as anticipated.

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Also Orange and Rockland Utilities, with whom Con Ed has a direct tie, has 250 MW of excess Capacity. Further, the N. Y. Power Pool has a gross Reserve Margin of 34.3% above anticipated peak demand.

Considering the above, we see little support for the Staff's "Evaluation". Particularly section 6.3. Despite their allegation to the contrary, there is no reasonable proof that the decline in the striped bass population will be reversible. Under Section 6.4, if as it is stated there is little likelihood that closed cycle cooling will not be required, then the benefits, if any, likewise must be very small.

Cooling tower technology is over 50 years old. Three years of study should be ample time to determine which type of cooling tower to use.

Very truly yours,

  
Walter L. Fleisher, Jr.  
Vice-president.