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DEPARTMENT OF PARES, RECREATION AND CONSERVATION

CITY OF YONKERS

285 Nepperhan Avenue, Yonkers, N. Y. 10701

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March 3rd, 1969

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Ex Officio MICHAEL J. MAFFEI Commission of Fullie Works PIULTE J. PISTONE Planning Director

Secretary United States Atomic Energt Commission Washington, D.C. 20545

Dear Sir:

والحراسة تعلو سلوبيت ليتاريك

IS J. LATCEAGLIONE

Actingscamissioner

Deputy Superintender:

ATRICE E. MOORA

Re: Consolidated Edison Company of New York, Inc. Indian Point Unit No. 3 Docket No. 50-286

In accordance with Section 2,715 of the Commission's Rules of Practice, I wish to make a limited appearance in support of the application at the hearing to be held in this proceeding on March 25, 1969.



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Sincerely yours,

l. rla. 6-Tartaglione Louis J. Acting Commissioner

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NATIONAL PARKS ASSOCIATION

Publishers of National Parks Magazine

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DEFICERS OF THE ASSOCIATION INTHONY WAYNE SMITH Perident and General Countel LARINCE COTTAM Commune, Board of Truttees and Exerciser, Board of Truttees and Executive Committee NERNER, C. MERRIAM, JR. Vice-Chairman, Board of Truttees and Executive Committee Committee Sontal D. A. MCCORMACK Treaturer, Member of Executive Committee Sontal D. A. MCCORMACK Treaturer, Member of Executive Committee Sontal D. A. MCCORMACK Treaturer, Member of Executive Committee Comm

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March 4, 1969

Mr. W. B. McCool Secretary U.S. Atomic Energy Commission Washington, D. C. 20545

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Office of the Secretary Public Proceedings Branch

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Dear Sir:

Re: Consolidated Edison of New York, Inc. Hearing on Application for Provisional Construction Permit - Docket No. 50-286

The National Parks Association desires to make a limited appearance in the above proceedings in accordance with the notice in the Federal Register for Wednesday, February 5, 1969.

Please confirm approval of this

request.

Cordially yours Anthony Wayne Smith

President and General Counsel

AWS:mn

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148 Seward St Buchanan, Ny march 4, 1 \$69 To Whom it may concerning as a resident of the above vellage where 6 atomic plante are to he built I am deeply concerned. regarding this concentration of Wenclear plante There is one more to be build in Story Pointhy, Which is almost directly opposite the above mentioned site. This feeling is shared by many, making residente in the surbinding thread I am Anclosing a small portion of information I have and wondered if you can't rebut any of this, for it is all most disturbing. I could clooute in all Achan reached a point mextreme Concerne and any and all information you may

en en en el anter el altre el have that might alleviate this concern on schalf of many people moved be gleatly appreciated. appricated. "Thanking your for your attention in this fortur I Im, Auch Belella (mrs Joseph Bilella) <u>.</u> . and the second

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"SIXTEEN REASONS WHY NUCLEAR POWER PLANTS, ENDANGERING MILLIONS, SHOULD BE STOPPED"

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. . . The Rapid Nuclear Reactor Expansion Into Populated Areas Is The Greatest Threat To The American Environment . . .

Facts Which Show-

Citizens Committee for the Protection of The Environment

11 Depot Plaza

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White Plains, New York 10606

Most Americans have heard that we are already enjoying the blessings of nuclear power. It comes as a shock to find scientist after scientist reporting that the operation of nuclear plants poses very real hazards to biological systems, including man. Yet the United States is embarked on programs which would increase nuclear power 30-fold in the next decade.

Threatened on every hand with rising levels of pollution, we must make every effort to prevent the release of radioactive wastes of a dozen different isotopes into the American environment.

Full documentation and references to support the following sixteen points are available without charge from the Anti-Pollution League, Allendale, N. J. 07401:

I. Nuclear Energy: The Big Question Mark

Obtaining electrical energy from nuclear reactors is a new technology and as such not far advanced. It was only in 1957 that the first nuclear power was produced in this country. In the meantime, formidable obstacles have been encountered which raise the question whether nuclear power could efficiently supply more than a very small fraction of our total energy needs—although it may be valuable and useful in special applications where conventional fuels or hydro-power are unavailable or scarce.

2. Whatever Happened to the Peaceful Atom?

By decision of Congress, the promotion of nuclear power was entrusted to the Atomic Energy Commission under the AEC Act of 1954. Although billions of dollars have been spent to induce utilities to go nuclear and to advance reactor development and safety programs, David E. Lilienthal, First Chairman of the Atomic Energy Commission, concluded five years ago that the earlier promise of nuclear energy was unrealizeable.

3. Fission vs. Fusion

Dr. James Bryant Conant and other scientists have long urged research in-

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to other forms of energy generation which do not entail the creation of deadly by-products and wastes. Dr. Conant warned "in practice, nuclear energy (fission) will be found too dangerous and too expensive." Nuclear fusion, if the thermo-nuclear process can be harnessed, would provide energy most economically, using abundant materials without creating a host of dangerous radio-active isotope by-products. Solar energy may be the eventual answer.

4. So-Called "Clean" Energy

The type of reactor now being built in large numbers is already obsolete, in the opinion of many experts. These primitive light-water reactors of both the boiling-water and pressurized-water design contribute to massive environmental pollution by enormous quantities of excess heat they generate and low-level radioactive wastes which are routinely discharged into the air and water in the normal operation of these plants. Therefore, "clean" energy is as misleading a term as "clean" bombs.

5. Plutonium As A By-Product

All nuclear plants of present design manufacture plutonium, the material required for nuclear weapons. Therefore, in a very real sense every nuclear power plant is a weapons plant. Already some of this dangerous available by-product plutonium is disappearing or has been stolen. In exporting reactors, we are providing many nations with the basic material to make nuclear weapons, almost thereby thwarting the expressed goals of the Nuclear Non-Proliferation Treaty. It is difficult to guard against the diversion of plutonium to military ends. How peaceful is the atom? Not very!

6. Using Up Uranium. Can We Afford It? The stepped-up and telescoped development of nuclear power brought about by the subsidized AEC program is using scarce fissile uranium-235 at a prodigous rate. All available uranium at the present price level is already largely committed to fuel the reactors now in prospect for the next decade. Yet these reactors utilize only about 1% of the potential energy in this scarce uranium. There are more efficient types of reactors in prospect but the so-called "fast-breeder," which could supply fantastically economical energy but must be started up with the uranium we now so prodigally waste.

7. Fast Breeder—A New Danger

To divert attention from the failure of light-water reactors to attain the promised economical operation, the "fastbreeder" is being pushed, even before there has been a sensible decision on whether or not certain controlling fundamental obstacles can be overcome. Chief among these is the safety factor. Dr. Edward H. Teller, the noted physicist, said, that these devices may be so dangerous that they should not be built at all. Light-water reactors, although they may be subject to accidents which could release large amounts of deadly fission product inventories into the environment with catastrophic results, can not blow up like an atomic bomb. "Fast-breeders," however, will contain vast amounts of plutonium and conceivably could blow up with all the violence of an H-bomb.

8. Atomic Accidents—Deadly Effects

Although ingenuous measures have been devised to shut down reactors in the event of trouble and to limit the consequences of an accident by containing deadly high-level wastes within the reactor structure, it is impossible to rule out accidents altogether. Human error and sabotage are ever-present possibilities.

9. Atomic Energy vs. The Bomb?

Should a major accident occur, the AEC has warned that death in the thousands, injuries in the tens of thousands and billions of dollars of property damage might result. Dr. Teller has warned that reactors do not belong on the "face of the earth," but deep underground where a system of interlocks

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could prevent radiation seeping over an area of several hundreds of square miles like a deadly blanket. Dr. Teller has said that radiation from a nuclear reactor is more to be feared than that from even the largest bombs, which vent much of their radiation high in the atmosphere. This fact supports the case for locating reactors only in isolated areas with low-level density populations.

10. Nuclear Power Reliability

Along with cost, reliability of service is of paramount importance in selecting methods of generating electric power. The Joint Committee on Atomic Energy, which supervises the operation of the AEC, warned on April 2, 1968, against the utilities placing dependence for vitally needed power on the new technology of nuclear power reactors. If nuclear reactors are delayed in delivery and require prolonged shakedown periods and then operate erratically because the colossal number of safety devices which can shut them down, not only will power be highly expensive, but unreliable—if any utility has a sizeable fraction of its generating capacity in nuclear form.

11. Effects of Radiation and Radioactive Waste

Citizens who live within 50 miles of the location of a nuclear reactor, particularly those downwind, are deprived of constitutional rights to equal protection under the law. Scientists are firmly of the opinion that any radiation, however slight, above natural background levels, causes genetic mutations; nuclear reactors, particularly those of large size when clustered together, could raise levels so appreciably as to increase the incidence of leukemia, cancer of the thyroid and other effects of radiation. Why should citizens be exposed to such risk without their knowledge and consent? The AEC allowances for the release of lowlevel radioactive wastes pay little attention to the recently recognized high susceptibility of pregnant women and

children and the ability of many organisms to re-concentrate waste in its passage through the food chain to hazardous levels.

12. The Public Defrauded

Since original guidelines for siting reactors in remote areas have been violated, at least 25 million Americans stand in danger of substantial financial losses in the event of a major nuclear reactor "excursion." Only \$560 million is available in a combination of private and government indemnity insurance. Without the \$486 million provided by the government at a nominal fee, utilities said they would not build nuclear stations. But at this figure there is a cut-off. The "no-recourse" provision of the Price-Anderson Act Extension in effect says the public must bear the risk of any damage exceeding the \$560 million stated limit. Besides the loss of life and injuries, in 1957, the AEC estimated that among the possible consequences of a major accident could be property losses ranging up to \$7 billion. This was for small reactors with a shorter fuel cycle and smaller fission product inventory than today's-and in 1957 dollars. Wtih today's reactors the losses could be truly staggering, a national blow, wiping out thousands of businesses, contaminating lands so that they should not be used for agriculture and requiring long-term evacuation of areas as large as some states. The public has no redress. It is impossible for an individual to buy private insurance to protect his property against nuclear damage.

13. Thermal Pollution

To avoid the damage to aquatic life from the release of billions of gallons of water a day needed to cool the condensers, engineers have offered mechanical cooling towers at a number of proposed nuclear plant sites. There is evidence that discharging vast amounts of heat into lakes or small rivers would be particularly damaging to fish life. Even a few degrees rise in temperature in bodies of water like Long Island Sound, which is already highly polluted, would cause multiplication of noisome bacteria and threaten the health of millions in water-contact sports and recreation. But discharging heat into the air via cooling towers in many locations would change the weather-causing fog and icing and predisposing to many more cloudy days per year.

14. Fossil Fuels Must Be Mainstay

Even should the present nuclear expansion proceed as proponents assumed, the nation would still be dependent at the end of a decade on fossil fuels for about 70% of all its power generation. Until recently, combustion of coal, oil and natural gas has given rise to objectionable levels of air pollution, particularly from sulphur dioxide. Now by new devices almost all of the sulphur compounds can be removed and fly ash and particulate matter reduced almost to zero. These devices should be installed on all existing fossil-fuel equipment as soon as possible because the utility industry accounts for about half of all such air pollution on a national scale. There is enough coal available for centuries. Therefore, there is no excuse for the haste which has characterized the nuclear energy expansion, particularly the "bandwagon" psychology which has prevail**ed** since 1966.

15. Underground Transmission of Electricity—Pattern for the Future

Numerous bills have been introduced in Congress seeking to minimize the damage to the environment caused by the present random pattern of siting both nuclear and the fossil fuel plants. As long as utilities chose their own sites, they will favor locations within the territory where they are afforded a monopoly to sell power. With present and future concentrations of popution, we can no longer tolerate the philosophy which says private profit is the greatest good. Strides in technology have enabled us to transmit electricity over long distances at comparatively low

cost. Progress is being made in underground transmission so that it would be possible on a long-range basis to plan a system whereby the Atlantic Seaboard and the Middle West might be supplied from an "energy-spine" running down Appalachia. Here both mine-mouth plants and safely underground nuclear stations might operate in a corridor from which people and animals had been removed in order to minimize the effects of pollution locally. With savings of such a system we could afford to install every possible pollution abatement and waste utilization devices. Although the initial investment would be sizeable in such a system, it could remove the critical pollution that exists in our major population centers.

16. Nuclear Wastes — Hell On Earth Until the problem of satisfactory disposal of high-level wastes is solved, no further sizeable nuclear expansion should be permitted. Already we have about 90 million gallons of this waste in temporary storage. With the expansion in prospect, the treatment facilities and areas needed for storage would have to be increased greatly. This "hot" waste is so deadly that a single gallon loosed in the environment could kill 2-3 million people. No one knows how long it will have to be carefully guarded, certainly many hundreds of years. Operating the nuclear reprocessing plants to separate this broth of deadly products from the still valuable "unburned" uranium and by-product plutonium is the dirtiest phase of the nuclear industry. It may be years before improved technology, which could perform these operations without hazard to the environment, is an accomplished fact. Transportation of high-level wastes has already resulted in serious leakage through accident and much more of this must be expected.

The handwriting is on the wall. Dare we create more of these deadly wastes until we have learned to safely dispose of what we have?

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UNITED STATES OF AMERICA ATOMIC EMERGY COMMISSION

In the Matter of

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point Nuclear Concrating Unit 3)

Docket No. 59-235

H. Smill

CERTIFICATE OF GERVICE

I hereby certify that copies of (1) request to make limited appearance by Joseph E. Curtis, Commissioner, City of White Plains Department of Recreation & Parks dated March 3, 1969; (2) request to read statement by Warren Ahneman, President of Cortlandt Conservation Association, Inc., dated March 4, 1969; (3) request to make limited appearance from John R. Drance, Commissioner, City of Mount Vermon Department of Recreation, dated March 3, 1969; (4) request to make limited appearance from John R. Drance, Commissioner, City of Mount Vermon Department of Recreation, dated March 3, 1969; (4) request to make limited appearance from Louis J. Terteglione, Acting Commissioner, City of Yonkers Department of Parks, Recreation and Conservation, dated March 3, 1969; (5) request to make limited appearance from Anthony Wayne Smith, President and Ceneral Gounsel, Mational Parks Association, dated March 4, 1969, and (6) letter from Mrs. Buth Bilello, Bachamap, New York, dated March 5, 1969; in the coptioned matter have been served on the following by deposit in the United States mail, first class or air mail, this 6th day of March 1969;

Secuel W. Jensch, Esq., Chairman Atomic Safety and Licensing Board U. S. Atomic Energy Commission Washington, D. C. 20545

J. D. Bond, Esq., Alternate Chairman Atomic Safety and Licensing Board U. S. Atomic Energy Conmission Veshington, D. C. 20545

Dr. John C. Geyer, Chairman Department of Sanitary Engineering and Water Resources The Johns Hopkins University Baltimore, Maryland 21213

Dr. Thomas H. Pigford c/o Thermo Electron Corporation 85 First Avenue Waltham, Hassachusetts 02154 Dr. John Henry Deck 2180 Mandeville Road Los Angeles, Celifornia 90949

Troy E. Conner, Jr., Esq. Regulatory Staff U. J. Atomic Emergy Commission Washington, D. C. 20545

Leonard M. Trosten, Esq. LeBoeuf, Lamb, Leiby & MacRae 1821 Jefferson Place, N. W. Mashington, D. C. 20036

Nr. W. Donhan Crawford Administrative Vice President Consolidated Edison Company of New York, Inc. 4 Irving Place New York, New York 19903 50-286

Honorable William J. Burke Mayor, Village of Buchanan Buchanan, New York 20511

House of Representatives Washington, D. C. 20515

Joseph F. Scinto, Esq. Commissioner of Connerce New York State Department of Connerce 112 State Street Albany, New York 12207

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Page 2

Office of the Secretary

cc: Mr. Jensin Mr. Conner Mr. Yors H. Blunt H. Smith

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