

FEDERATED CONSERVATIONISTS OF WESTCHESTER COUNTY, INC.

Dedicated to environmental planning and education for the preservation of our natural resources.

Box 1306, Marymount College, Tarrytown, New York 10591 (914) 631-2336

December 7, 1973

DIRECTORS

MRS. DAVID C. DONALDSON
President

GEORGE M. RAYMOND
1st Vice President

MRS. DIANA REISCHE
2nd Vice President

MRS. ALIX GRUNEBAUM
Secretary

JOHN LoWARE
Treasurer

R. Bradlee Boal
Mrs. Florence Cafarelli
Mrs. Jonathon Coggeshall
Paul C. Delaney
Alfred S. Forsyth
Mrs. Arthur H. Fredston
Mr. Steven Gelf
Miss Mary Ellen Harris
William Hoppen
George R. Lumb
Mrs. Jay Liasson
Mrs. Susan A. Morison
Drew Panko
Nicholas A. Robinson
Robert H. Schofield
Mrs. Laura Seitz
Mrs. G. A. Simpkins
Pieter H. Vree
Ralph R. White

ADVISORY BOARD

Dr. Edward H. Buckley
Dr. Sean Fanelli
Dr. Richard H. Pough
Mrs. Robert L. Reed
Dr. Stanley C. Wecker

EXECUTIVE DIRECTOR

Mrs. Betty Lee

U.S. Atomic Energy Commission

Attention: Deputy Director for Reactor Projects
Directorate of Licensing

Washington, D.C. 20545

This letter is to comment on the Draft Environmental Statement for Indian Point No. 3 (A.E.C. Docket No. 50-286).

Federated Conservationists of Westchester County, Inc. is a coordinating group of 59 organizations in Westchester County concerned with environmental problems in the county, including the nuclear generating facilities at Indian Point and the Hudson itself.

As indicative of the breadth of our interest in these problems, attached hereto and made a part of this comment is the Statement of Policy of the organization, dated March 10, 1971, with reference to the proposed licensing of Indian Point No. 2.

Leaving to experts more particular comment with regard to the Draft Environmental Statement, we commend the AEC for its recommended installation of cooling towers. We believe any delay in the erection of the cooling towers should be rejected as an impermissible relaxation of the utility's responsibility to the Hudson. In the meantime, until cooling towers are installed, the utility should be required to avoid maximum operational strain on the fish life in the river. Other aspects of study to minimize fish kills in the pre-cooling tower period, a clearer cost-benefit analysis, and a coordinated study of the Indian Point-Storm King impact is essential.

We renew our suggestion, both to the AEC and Consolidated Edison itself, that it get effective independent outside help to assist it in solving its environmental problems; those who are expert in producing power at the least cost are not necessarily the best people to determine questions of meeting necessary standards of air and water quality, of aggressively pressing for alternatives in terms of transmission, generation, and storage of electricity, or of relating the utility's responsibility to environmental goals. Just as a utility has accountants to go over its

8111190954 731214
PDR ADOCK 05000286
PDR

8858

books, and independent certification of its accounts, it would do well to have independent environmental experts undertake its compliance programs, and to subject its operations to a periodic environmental audit by outside and independent environmental experts.

This is particularly crucial now that we are, as predicted, moving into a period of energy shortages in all areas; the energy crisis must not be the occasion for public utilities to allow problems of management and planning to obscure the importance of environmental controls. Rather, it should be taken as a challenge to continue to produce energy at the most efficient and economical rate and, at the same time, to redouble and make more effective efforts to find environmental solutions in all phases of operation, from generation through storage and transmission to the consumer.

Mrs. David C. Donaldson, President
Rose J. Donaldson
Federated Conservationists
of Westchester County, Inc.

Enc.

FEDERATED CONSERVATIONISTS OF WESTCHESTER COUNTY, INC.

Dedicated to environmental planning and education for the preservation of our natural resources.

20 Soundview Avenue, White Plains, New York 10606 (914) 761-3403

March 10, 1971

Statement of Policy by the Federated Conservationists of Westchester County, Inc.

With reference to the Proposed
Licensing of a Nuclear Generating
Station at Indian Point, New York
(Indian Point No. 2)

We are aware of the need for power in the New York metropolitan area, and of the technological incapacity of Consolidated Edison to meet these needs. And yet, the power emergency is as much an emergency in terms of corporate and political leadership as it is in terms of electrical power, a default in leadership that does not yet relate its responsibilities to the growing need for environmental conservation and protection.

It is against this background that we address ourselves to the burden of full environmental responsibility resting on those who would build nuclear plants.

To the extent that its rules accord with recognition of its full environmental responsibility, and its actions are consistent with this responsibility in these matters, the Atomic Energy Commission will properly acquit itself of its duty. To the extent that it does any less, it is subject to legitimate environmental criticism and subject to such changes in its organization, powers, and procedures as Congress may eventually determine to be necessary to bring the Commission's functions and operation into harmony with the environment.

This responsibility, in short, rests both upon Consolidated Edison Company and the Atomic Energy Commission, since they are so closely related in the planning and construction of the proposed facility, that they assume the full burden of proof that the proposed plant will not damage the environment or adversely affect the public health and safety. In the absence of having met such burden, the plant should not be licensed for operation until this burden is met. Indeed, until this burden is met, we are moved on a broader basis to urge that a moratorium be imposed on all new nuclear plants.

The particular areas of environmental impact with regard to which we would like to have more information to establish the proposed plant's compliance with environmental standards are:-

- 1- Taken in conjunction with existing and proposed utilities' construction in the area, to what extent will this proposed use of the waters of the Hudson add a thermal increment to those waters; and can the utility and the Atomic Energy Commission establish by a fair preponderance of the evidence that such thermal increment will have no adverse effect on the ecological balance of the River, or adversely affect its marine life?

Full Environmental Responsibility -2-

2- To what extent, taken together with existing and proposed construction, will the proposed installation add radioactive elements, in the low level range, to our air and water; and can the utility and the Atomic Energy Commission, in connection with their proposed plant, establish that the cumulative effect of such low level radioactive waste will have no adverse effect upon the chain of life, or upon the mutation rate, or in terms of cancer?

3- To what extent will the proposed installation, taken by itself, create a danger of nuclear excursion through malfunction of the unit, or through sabotage resulting from breach of security, or unfriendly act; and can the utility and the Atomic Energy Commission guarantee that the installation will cause no danger to life or property of those living in the New York metropolitan region?

Would the utility, in the absence of Government insurance against catastrophe, be prepared to construct and operate the proposed plant and to secure conventional insurance at rates to be set by underwriters on the basis of their independent evaluation of the risks involved?

4- To what extent will the proposed construction result in possible contamination of neighboring areas running into the next century through long-lived radioactive elements in the installation housing; and what provisions, after termination of the use of the plant, are there for removing the installation housing to prevent possible contamination of ground water levels?

5- To what extent is the utility prepared to adjust its plans to natural, scenic and esthetic considerations, and to protect the natural values and scenic beauty of the Hudson and of Westchester by screening or undergrounding its plants, and by undergrounding the overhead transmission lines that now disfigure the county, the Hudson Valley and the region?

6- To what extent is the utility and the Atomic Energy Commission prepared to guarantee that the transportation of radioactive elements from and to this and other installations existing and proposed for the Hudson and Long Island Sound regions will not adversely affect the health and safety of the people of Westchester and of the New York metropolitan region?

We ask the assistance of independent scientists, particularly those in the biological field, to review and advise us, the utility and the Atomic Energy Commission with regard to these problems, and to assist our planning officials to proceed wisely and carefully with the major problem of reconciling planning to meet our reasonable energy needs with the requirements of protecting the environment.

Marilyn C. Bowler
President

Federated Conservationists of Westchester County, Inc.