

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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IN REPLY REFER TO:

TORY ROSET FILE COPY

George W. Knighton, Chief Environmental Projects Branch No. 1 Division of Site Safety and Environmental Analysis U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Knighton:

Subject: Draft EIS

Proposed Action: US NRC Closed Cycle Cooling System Indian Point Nuclear Generating Unit No. 3, Village of Buchanan, Westchester Co., N. Y.

We have reviewed subject statement and we have the following comments on the environmental aspects of the proposed action. These comments are essentially the same as those we made on reviewing the DEIS of the Closed Cycle Cooling System for Unit No. 2 of the Indian Point nuclear generating installation.

A critical issue is the massiveness of the power complex at Indian Point. The number of reactors has increased over the years to three and their waste heat will now be disposed of almost entirely on the land and atmosphere. The impacts of Indian Point on its surrounding communities will therefore be felt directly as a daily experience and will cut across the major constituents and qualities of this part of the Hudson River valley.

For example, the City of Peekskill, which has spent much time, money and effort on its planning and development, must now contend with unexpected and adverse influences, many of which the City has detailed in its response to the DEIS for the closed cycle cooling system planned for Indian Point Unit No. 2. In addition, the classical river community of Verplanck is in the path of much of the worst air-borne effects of the proposed towers, and the cooling towers almost reach the height of Dunderberg Mountain across the river, overwhelming all other man-made features in the area.

The final statement should, therefore, address the following issues:

Since at least two on-site cooling systems and possibly three will be required, the cumulative impact of the systems should be assessed.

Any particular requirements critical to the siting of three cooling systems should be identified and considered.

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The shadow effect cast by the sun, particularly the cumulative impact of a possible set of three towers including their plumes, should be determined and assessed.

Reclamation of waste heat for some useful local purpose should be considered as a possible feature, now or in the future, of a CCC system.

A cooling system that more equitably shares the impact of disposing of waste heat on both the river and the land-atmosphere might be considered.

Thank you for the opportunity to review the statement.

Sincerely,

acting Mirector

New York Area Office

cc: Council on Environmental
Quality (5)

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