

Union of  
**CONCERNED  
SCIENTISTS**

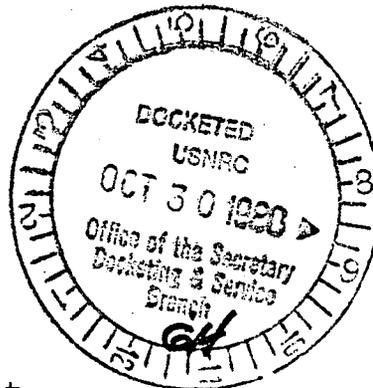
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HAND DELIVERY

October 29, 1980

Mr. John Ahearne, Chairman  
Mr. Peter Bradford, Commissioner  
Mr. Victor Gilinsky, Commissioner  
Mr. Joseph Hendrie, Commissioner  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555



Re: Indian Point

Gentlemen:

The accident at Indian Point Unit 2 on Friday, October 17, raises serious questions about both the competence of the Consolidated Edison Company and the condition of the plant. You presently have under consideration the Union of Concerned Scientists' request for full hearings to reassess the safety of Indian Point. Your preliminary rulings indicate that you will order these hearings, but a definitive decision has been inexplicably delayed for months. This incident reinforces our belief that you should act immediately to set the hearing process in motion and that you should make no decision to allow interim operation of the plants until there has been a full public investigation of the causes and effect of this latest accident.

This investigation should, at a minimum, address the following questions:

1. What were the causes of the leak?
2. What has been done to prevent future leaks?
3. Is it appropriate to use Hudson River water to directly cool potentially radioactively contaminated components?
4. What are the means available to detect leaks and to remove water? Why and how did they fail?

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5. Does the failure of both the leak detection and water removal systems indicate further deficiencies in the quality of equipment needed to protect the public?
6. Why did ConEd eventually enter the containment at the time it did? Had ConEd not then entered the containment, how much higher could the water level have risen before being detected? How much additional equipment would this have damaged? What risk to safety would have been presented?
7. Do ConEd's repeated attempts to restart the plant after automatic trip indicate insensitivity to safety and/or an overriding concern to keep the plant running?
8. What equipment was actually damaged? What equipment was potentially subject to damage?
9. What tests can be done on such equipment -- including the pressure vessel -- to assess the extent of damage? Are such tests reliable?
10. Can the chlorides in the water be effecticely removed to assure that corrosion will not continue if the plant is restarted?
11. During the construction of Unit 3, the steam generators were contaminated with salt water and cleaning was not effective to stop corrosion. What is the reason to believe that cleaning will be effective in this case?
12. What was the justification for the delay in ConEd's reporting this accident to the NRC?
13. Should the NRC ensure the presence of a resident inspector on a 24-hour basis?
14. What was the reason for the delay in the resident inspector reporting to his supervisors?
15. Should these questions be addressed in an adjudicatory hearing, particularly considering that such vital issues as the integrity of the reactor pressure vessel involve subjective judgments?

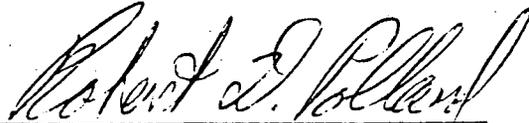
Before the Commission decides that the Indian Point plants are safe enough to operate, these questions must be answered. The

answers are likely to shed much more light on the safety of Indian Point than the theoretical and highly questionable probabilistic analyses that the NRC staff and the licensees have underway.

Very truly yours,



Ellyn R. Weiss  
General Counsel



Robert D. Pollard  
Nuclear Safety Engineer

ERW/RDP:jhs