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NRCREP Resource

From: Arthur "Jerry" Kremer [info@area-alliance.org]
Sent: Friday, August 17, 2012 2:44 PM
To: NRCREP Resource
Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Arthur "Jerry" Kremer (info@area-alliance.org) on Friday, August 17, 2012 at 14:43:59

Document Title: Generic Environmental Impact Statement for License Renewal of Nuclear Plants: Supplement 38 Regarding Indian Point Nuclear Generating Unit Nos. 2 and 3 - Draft Report for Comment (NUREG-1437, Supplement 38, Volume 4)

Comments: August 17, 2012

Chief, Rules, Announcements, and Directives Branch Division of Administrative Services Office of Administration Mail Stop: TWB-05-B01M U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Dear Sir or Madam:

I am writing on behalf of the New York Affordable Reliable Electricity Alliance (New York AREA) to express support for your revisions to the Generic Environmental Impact Statement for Indian Point Energy Center's Units 2 and 3, as outlined in NUREG- 1437, Supplement 38, Volume 4, draft supplement to final.

The revised supplement to the EIS indicates that the initial assessment of the Indian Point's impact to the Hudson River was greatly over estimated. Specifically, NRC staff overestimated the entrainment losses for each of the representative important species studied in the analysis by a factor of 1000.

NRC also revised conclusions regarding the impact of thermal discharge from Indian Point Units 2 and 3, based on information provided by the New York State Department of Environmental Conservation. The New York State DEC's findings indicate that the discharge from Indian Point Units 2 and 3 is in compliance with its water quality standards and criteria for thermal discharges.

As stated on page 20, lines 25-28, "NYSDEC and NYSDEC's (2011) conclusions regarding studies provide reasonable assurance that the IP2 and IP3 discharge is in compliance with NYSDEC's water quality standards and criteria for thermal discharges."

The report's revisions show that the slightly heated water released from Indian Point has a "small" impact to the Hudson River and confirms our belief that there is no environmental reason precluding the plant from having its operating licenses renewed.

Of particular note, the National Marine Fisheries Service finds that the shortnose sturgeon is not threatened. As stated from page 23, line 42, to page 24, line 4, "In its biological opinion, NMFS concluded that shortnose sturgeon are likely to avoid the small area of water elevated above the species preferred temperature range and that — it is extremely unlikely that these minor changes in behavior will preclude shortnose sturgeon from completing any essential behaviors such as resting, foraging or migrating or that the fitness of any individuals will be affected."

The license renewal of Indian Point is important for New York's environment, in particular our air quality. Indian Point's continued operation reduces New York's need for fossil fuels, thereby mitigating carbon and other toxic

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emissions. In light of New York's often poor air quality and continuing non-compliance with the federal Clean Air Act, it is imperative that the plant obtain license renewal.

Thank you for your time.

Sincerely,

Arthur J. Kremer

Chairman
New York AREA

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