

African American Environmentalist Association

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Annette Vietti-Cook
Secretary of the Commission
Office of the Secretary
Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Indian Point Units 2 and 3 License Renewal Application
NRC Docket Nos. 50-247-LR and 50-286-LR
ASLBP No. 07-858-03-LR-BD01

Dear Secretary Vietti-Cook:

I am writing you on behalf of the African American Environmentalist Association (AAEA) and its members to express our support for Indian Point Energy Center in Buchanan, NY. AAEA is a national nonprofit environmental organization dedicated to protecting the environment, enhancing human, animal and plant ecologies, promoting the efficient use of natural resources and increasing African American participation in the environmental movement. It is my understanding that the NRC is considering numerous issues in connection with the application for license renewal of Indian Point Units 2 and 3, including environmental justice concerns.

Ozone is probably the most important pollutant in terms of health impacts as related to environmental justice. We strongly believe that Indian Point's continued operation is imperative to reducing reliance on fossil fuel generators, which emits volatile organic compounds, greenhouse gases and nitrogen oxides. These harmful pollutants are located in environmental justice areas. If Indian Point shuts down, there will be significant pressure to replace this carbon-free facility with power from fossil fuel plants, the majority of which are located in African American and other minority communities in the New York metropolitan area. In fact, a 2011 study commissioned by the New York City Mayor's office found that Indian Point's closure would cause carbon emissions to increase by up to 15 percent and nitrous oxide emissions to increase by 7-8 percent in both the City and State.

According to the Environmental Protection Agency (EPA), the metropolitan region of New York City has consistently failed to meet the clean air standards for

smog-causing ozone. The New York Department of Environmental Conservation (DEC) is required to create a plan for New York to meet the standards. Smog is a public health concern because it causes respiratory illness and aggravates asthma. Smog is formed on hot, sunny days, when sunlight causes nitrogen oxides (NOx) and volatile organic compounds (VOCs) to react and form ozone. These pollutants come from cars, trucks, diesel construction equipment, power plants, refineries, other large industrial facilities and from paints and some consumer products. When inhaled, ozone can make people more susceptible to respiratory infection, result in inflammation of lung tissue, aggravate existing respiratory diseases such as asthma, and lead to increased hospital admissions and emergency room visits. Ozone can cause significant decreases in lung function and increased respiratory symptoms.

The American Lung Association estimates that there are 2,290 deaths, 1,580 hospitalizations, 546 asthma-related emergency rooms visits, 1,490 cases of chronic bronchitis, and 46,200 asthma attacks yearly attributable to power plant pollution in the City alone. Any reduction in air quality would have a disproportionate effect on our most vulnerable communities. African Americans and other minorities are already disproportionately affected by air pollution in New York and childhood asthma rates in New York City are much higher than they should be.

Indian Point provides 2,000 megawatts of carbon-free power to power millions of homes throughout New York City and State. Its continued operation is essential to protecting the environment and the lives of individuals who live in designated environmental justice areas. For these reasons, we urge you to renew the operating licenses for Indian Point Units 2 and 3.

Thank you for your consideration of my comments.

Sincerely,


Norris McDonald
President

cc: Administrative Judge Lawrence G. McDade
c/o Anne Siarnacki, Law Clerk
Atomic Safety and Licensing Board Panel
Mail Stop T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Fax to: (301) 415-5599 (verification (301) 415-7550)
Email to: anne.siarnacki@nrc.gov