

Docket, Hearing

From: Berl Brechner [bbrech@bestweb.net]
Sent: Tuesday, September 11, 2012 1:59 AM
To: Docket, Hearing; Siarnacki, Anne
Cc: bbrech@bestweb.net
Subject: Statement re: Indian Point

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Limited Appearance Statement

To: NUCLEAR REGULATORY COMMISSION
Re: [Docket Nos. 50-247-LR and 50-286-LR; ASLBP No. 07-858-03-LR-BD01]

Atomic Safety and Licensing Board; Entergy Nuclear Operations,
Inc. (Indian Point Nuclear Generating Units 2 and 3); Notice of Hearing
(Application for License Renewal)

From:
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Introduction:

For several reasons outlined below, I believe that the operating licenses of the nuclear plants at Indian Point, NY, should NOT be extended beyond their scheduled expirations. For your information, I and my family live in the southwest portion of the Town of Yorktown, within the Croton-Harmon School District, roughly seven miles from the Plants' location, and within the emergency evacuation zone of the Indian Point Plants.

Discussion:

Fundamentally, given that these plants, with population growth in the region over the decades, have likely the largest density of population of any plant in the U.S. within a possible emergency zone, and given that even with reasonable and prudent maintenance aging equipment is more prone to failure than new equipment, these facts alone should cause the Commission to conclude that these facilities have lived their predicted and licensed life, have provided their operators the service for which they invested, and that it is only logical now allow them to be decommissioned. Additionally:

1. The Evacuation Plan will not assuredly work. Evacuations are messy things as we have learned from other emergency events. The 21-page planning book for an Indian Point emergency, the 2010-11 version of which is entitled "Are You Ready?" (which, I have learned has not been updated at this time) is based on certain assumptions: elderly and disabled have registered their "special needs", as instructed, and can be transported quickly; people have made other pre-planned arrangements for their pets, as instructed, and will indeed be able to drive them somewhere outside the evacuation area; drivers of evacuation buses will show up for duty; medical issues of evacuees and at facilities such as nursing homes won't be an issue; the evacuation won't be hampered by snow storms, flooding, or power failures or other infrastructure damage or repair; and that

parents won't rush to schools to try to get their children. (One infrastructure issue, for example, is that since last Spring and continuing to this Winter the Taconic Parkway, a major route in the evacuation plan, has been shut down in one direction for bridge repairs, and is daily, with routine traffic, a major choke point in the evacuation area.) And there is a more fundamental question: Do most household members even look at, or save, the "Are You Ready?" book and its centerfold map of routes and locations of reception stations, and do all the pre-planning, pet care arranging, and registering of special needs, etc. as instructed? The nuclear crisis in Japan must make us re-think the practicality of effective evacuation and displacement of hundreds of thousands of people. Has the practicality and feasibility of this plan actually be studied in light of such events?

2. An evacuation may not be a temporary measure. As we have seen from the Japan event, evacuated residents may not be returning to their homes or businesses for months. Or worse yet, maybe never. We must learn that a nuclear evacuation is not like an evacuation for a fire or flood. Those have definitive endings. A nuclear evacuation may continue indefinitely. How has that been prepared for, and has the public been presented with that possibility?

3. If there's a mishap, and an evacuation is called for, the impact will be devastating, even if there isn't serious damage or injury. Such an evacuation would take an indelible toll, forever, on the lives and fortunes of those in the evacuation zone. For those of us in Westchester County, it's likely that should any incident at Indian Point occur requiring evacuation, just the fact that it did occur, would be a life-changing disruption and economic and property-value calamity to thousands or hundreds of thousands of families, and a death-blow to the economy of the region. Has that factor been explored? What would be the economic consequences to the region?

4. As much as we may try, all possible failure scenarios cannot be predicted. The Fukushima situation seems to have shown that. Would Indian Point's plants suffer multiple failures that were unanticipated? Is extension of aging plants' operating time in this populated area, given all the possible failures that are predictable, and those that aren't, worth the risk in this area?

5. It is time to relieve those of us living in the shadow of this plant from the concern about our and our childrens' safety, risk to our property, livelihoods and economic stability, and potential for short-term or permanent dislocation. The plants had a "term limit". We recognized that and have lived with it. But we have also seen consequences at nuclear facilities that were unknown and unimaginable decades ago. It has lead to warning sirens, testing of them, road signs with instructions for evacuation, stockpiling of potassium iodide in schools, etc. In other words, the concern over a nuclear plant failure, and resulting potential for evacuation and injury has become ever-present in the psyche for hundreds of thousands of people who, decades ago, did not face these kinds of concerns. It is time to end this for local residents, rather than extend this fear and uncertainty for decades into the future.

Summary:

If the original planning and the technology of Westchester's nuclear plants is now more than a half-century old, and that original planning was for a the present plants to live and serve a life to years 2013 and 2015, and we now see greater risks, aging structure, and much expanded population in the region, and an outdated evacuation plan that flies in the face of human behavior, does it make sense to even consider re-certification and an extended life for these plants?

The need for energy must be taken seriously. Shortage of electrical power would have severe economic impacts. But we still have several years for serious planning for life after Indian Point.

It is time to accept a planned but prompt decommissioning of nuclear power at Indian Point, rather than encouraging the "whistling past the graveyard" mentality that may have been going on as we ponder these old-technology nuclear plants now located in one of the densest population areas in the world.

Thank you.

Berl Brechner