

**Docket, Hearing**

RAS E-1163

**From:** Cindy Cowden [ccowden2@hotmail.com]  
**Sent:** Saturday, September 15, 2012 1:40 PM  
**To:** Docket, Hearing  
**Subject:** Indian Point Nuclear Reactor--it is time to shut it down

September 15, 2012

Office of the Secretary, Rulemakings and Adjudications  
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Washington, DC 20555-0001  
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I am writing to urge the Nuclear Regulatory Commission to deny the application by Entergy for a 20-year license extension for the two operating nuclear reactors, IP-2 and IP-3, at Indian Point Energy Facility in Buchanan, NY. Located in the most densely populated region of the country, Indian Point is one of the most dangerous nuclear plants in the nation, according to the Nuclear Regulatory Commission (NRC) itself. These plants are at the end of their expected 40-year lifespan. During these years we have witnessed serious nuclear accidents at Chernobyl and Three Mile Island, and more recently at Fukushima. In August 2011, New York experienced the effects of an earthquake, Hurricane Irene, and a tornado all in one week. It is no longer prudent to believe that "It can't happen here."

**Severely Narrowed Relicensing Process:** Over the years the relicensing process for nuclear power plants has been severely narrowed to exclude critical information that common sense dictates – and the public would expect – would be addressed, such as increased population density, having a viable evacuation plan that is really able to be implemented and includes a full 50-mile radius as was recommended in the Fukushima disaster, or the health impacts of ongoing releases of radioactivity into the air and water. The Atomic Safety Licensing Board's decision to exclude from consideration the two earthquake faults documented in 2008 by Columbia University's Lamont-Doherty Earth Observatory seismic experts is baffling and contrary to the scientific evidence.

**A History of Serious Problems:** Relicensing depends solely on the physical condition of the reactor and supporting equipment, which is aging, deteriorating and leaking radioactive isotopes from the groundwater under the plant into the Hudson River. In the case of buried piping, corrosion is difficult to detect. In addition the plant has a history of multiple transformer explosions, a major steam pipe rupture, clogged cooling system intakes, repeated siren failures – and is a sitting target for terrorism.

**Dangerously Over-Crowded Fuel Pools:** The plant's spent, but still highly radioactive, fuel assemblies are densely-packed into severely over-crowded fuel pools, which are housed in totally unprotected metal storage buildings. Because of the dense packing and the layer of debris that covers the bottom of the fuel pools, Entergy is unable to visualize 60% of the fuel pool liners. The Boraflex panels, which are meant to absorb neutrons, are degrading over time. The possibility of a spontaneous fuel pool fire cannot be ruled out.

**On-Site Waste Storage:** When the plant was first licensed it was widely believed that the federal government would open a national waste depository at Yucca Mountain to which spent fuel from Indian Point would be sent, but that option is no longer under consideration and there is no other repository on the horizon. Indian Point is now storing 1,500 tons of highly-radioactive spent nuclear waste on site and would add an additional 1,000 tons if the plant is relicensed for another 20 years, posing an ongoing and unnecessary threat to the region.

**Health and Environmental Impacts:** Although health impacts are not being considered in the relicensing hearings, studies have shown increased rates of cancer and other illnesses related to exposure from planned and unplanned releases of radioactivity. Indian Point's once-through cooling system uses 2.5 billion gallons of water a day from the Hudson River, seriously impacting its still-declining fish population. The impact of climate change has not been considered.

Rising sea level, warmer water temperatures, and increasingly severe storms and flooding will further reduce the safety of Indian Point.

**Evacuation is Impossible:** Even if the possibility of an earthquake, a terrorist attack, or a fuel pool fire or other accident at Indian Point is remote, the consequences of a serious problem at Indian Point would be devastating. Approximately 20 million people live or work within 50 miles of Indian Point and there is no evacuation plan for New York City. Within minutes of an accident or incident at Indian Point, gridlock would occur, making evacuation impossible. People without personal transportation, the elderly and disabled would be disproportionately affected. This is a nightmare that can be prevented by closing and decommissioning the plant.

**Replacement Energy is Readily Available:** When Indian Point was first built, most of its electricity was used by local utilities; now less than 25 percent of Indian Point's 2,000 MW capacity is used in NY State. Nuclear power is rapidly being replaced by energy efficiency and renewables, repowering and improved storage and transmission capability. Governor Cuomo's Energy Highway is currently addressing ways of bringing excess power, including 4,000 megawatts of wind in the western part of the State, to the greater NY metropolitan area. In January 2012, the NYS Assembly Committee on Energy concluded that there is more than enough power to allow Indian Point to close without overburdening ratepayers or threatening reliability standards.

Indian Point could never be licensed in its present location or condition today, so it defies logic to extend its current licenses for another 20 years. To do so is playing a dangerous game of Russian roulette with our lives and future, when safer, cleaner alternatives are immediately available.

Thank you for considering these comments.

Sincerely,

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