

**Docket, Hearing**

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**From:** Michel [ciecplee@verizon.net]  
**Sent:** Saturday, September 15, 2012 4:54 PM  
**To:** Docket, Hearing  
**Subject:** IPSEC STATEMENT URGING NRC DENIAL OF 20 YEAR INDIAN POINT LICENCE EXTENSION

**Indian Point Safe Energy Coalition  
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September 15, 2012

**IPSEC STATEMENT URGING NRC DENIAL OF 20 YEAR INDIAN POINT LICENCE EXTENSION**

September 14, 2012

Office of the Secretary, Rulemakings and Adjudications  
Staff, U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001  
Fax: (301) 415-1101  
Email: [hearing.docket@nrc.gov](mailto:hearing.docket@nrc.gov).

Please deem this communication a written appearance statement submitted on behalf of the Indian Point Safe Energy Coalition (IPSEC). IPSEC is a non-profit, non-partisan coalition of citizen, environmental, health, and public policy groups formed in 2001 in response to the flood of citizen concerns about the safety of the Indian Point nuclear power plant (thereafter renamed the "Indian Point Energy Facility") in Buchanan, New York.

**IPSEC strenuously urges the NRC to deny the request for relicensing of the Indian Point nuclear reactors in Buchanan, NY.**

Three core reasons make denial an imperative. Each stand on their own.

**ONE: Indian Point is an aging, degrading, problem plagued facility** that has already had a staggering number of operational and system integrity problems, including: fires; explosions; steam generator problems; cooling system malfunctions; clogged water intakes; safety injection system degradation; emergency sump pump defects; boric acid corrosion; nitrogen gas accumulation; hydrogen gas buildup; reactor control rod malfunctions; electrical failures; voltage control mechanism problems; emergency backup generator failures; fire barrier system defects; security system failures; external communication system (siren) failures; internal emergency communication system failures (during a major regional blackout, no less); computer software problems; pressurizer safety valve malfunctions; pipe breaks; and a series of radiation leaks. The list goes on and on.

Many of these problems patently relate to aging (i.e., corrosion, embrittlement and deterioration).

Heavy precipitation and wide temperature swings in the region will most certainly take a further toll on the plants, accelerating corrosion in buried pipes, cables and other structures.

To give a nuclear plant which has already demonstrated age-related safety problems in its first 40 years of operation a license to continue operation for 20 more years is irrational and dangerous.

**TWO: The security risk is untenable.** Indian Point is very arguably the prime target in the United State for a terrorist attack aiming to sow maximum terror and destruction.

New York City sits a mere 24 miles downwind of Indian Point. New York City has already been attacked twice. The 9/11 Commission revealed that the 9/11 terrorist pilots flew the low-altitude "hallway" along the Hudson River in preparation for the World Trade Center attack and reported led that that the plot tactical leader Mohamed Atta "mentioned that he had considered targeting a nuclear facility he had seen during familiarization flights near New York - a target they referred to as 'electrical engineering.'" (Kean, et al, "The 9/11 Commission Report: Final Report of the National Commission on Terrorist Attacks Upon the United States," at p. 245.)

It is difficult to imagine the dots here being any clearer to connect.

An alarming body of evidence has also exposed security vulnerabilities. These are well enumerated in published investigative reports. Yet, astonishingly, even now, a full decade after the largest terrorist attack on our nation, there exists no requirement that Indian Point be able to withstand a 9/11-type attack. Perhaps most disturbingly, many security flaws and failures have been revealed only because courageous workers at the plant have been willing to risk their jobs and become whistleblowers.

Further, even the most hardened and robust facility is vulnerable to cyberattack. The public record is quite clear that neither the government nor the private sector has current capability to protect either reactors or the grid upon which they depend against such an assault.

**THREE: Indian Point is located in the most densely populated region of any reactor in the nation (or in the world, for that matter).**

Some 20 million people - a considerable portion of the U.S. population – live within the 50 mile ingestion zone. Approximately a million live within 20 miles. Over 300,000 live within 10 miles.

The region is regularly subject to gridlock, even on a good day. The suggestion that any sizable number of people can be rapidly and effectively evacuated during a major emergency event defies rational belief.

The idea that even a small segment of the regional population could be evacuated or protected during a major storm or other natural disaster scenario - when road blockages, public transit inoperability, and electrical power outages are widespread, and communications and mobility are degraded - is also preposterous.

Even more absurd is the assertion that effective emergency response action under such conditions can be relied upon to mitigate an accident.

**Concluding Point: Fukushima, 9/11, Katrina, the BP disaster all attest to the fallibility of "failsafe" systems.**

These disasters also all attest to the fallibility of risk estimates.

Fukushima, of course, was relicensed just weeks before its nuclear disaster.

In recent testimony to the Japan parliament, former Japan prime minister Naoto Kan said that the accident had brought Japan to the brink of evacuating metropolitan Tokyo and its 30 million residents and that the loss of the city would have led to the collapse of the nation's ability to function." He acknowledged that Japan's nuclear plant safety was inadequate because policy had been hijacked by the "nuclear village," a reference to the cowing of regulators to the nuclear industry.

It is our earnest hope that the NRC will not be similarly cowed.

We end with the plea that the Commission uphold its primary mandate to protect the public. Please do not gamble with the health and lives of millions of Americans. Please do not risk the possibility of the New York Metropolitan region becoming uninhabitable for decades, or even centuries.

Please show us that there are some risks you are not willing to take.

Sincerely,

Michel Lee, Esq.  
Steering Committee  
Indian Point Safe Energy Coalition

cc:  
Administrative Judge Lawrence G. McDade  
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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF