

RAS E-1320

September 10, 2012

DOCKETED
USNRC

September 28, 2012 (3:00 p.m.)

Advisory Board

Arthur J. ("Jerry")
Kremer
Advisory Board Chairman

Richard T. Anderson
New York Building
Congress

Heather Briccetti
The Business Council of
New York State

Matthew Cordaro
Formerly with the
Midwest ISO

Gavin J. Donohue
Independent Power
Producers of New York,
Inc.

Dr. Marsha Gordon
The Business Council of
Westchester

Denis Hughes
New York State AFL-CIO

Tom Klein
Boilermakers Local No.5

Norris McDonald
African American
Environmental
Association

Al Samuels
Rockland Business
Association

Bob Seeger
Millwrights Local 740

Kathryn Wylde
Partnership for
New York City

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**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 a decades-long environmental advocate, a co-founder and former leader of Greenpeace, and an advisor to the New York Affordable Reliable Electricity Alliance (New York AREA). I write to express my support for Indian Point Energy Center in Buchanan, New York. 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 and the potential for alternative energy sources.

Indian Point safely and reliably provides 25 percent of downstate New York's power, with virtually no greenhouse gas emissions, at competitive prices. In fact, nuclear power is one of the cleanest sources of energy and in many countries concerned about pollution and cost this energy resource holds strong appeal. The negative environmental effects of shutting down Indian Point are well-documented in multiple independent studies and reports. All conclude that replacing the 2,000 megawatts of energy that Indian Point provides with fossil-fueled plants, such as natural gas or coal, would dramatically increase emissions into the atmosphere and the surrounding environment.

A recent report by the energy and environmental consulting firm Charles River Associates determined that replacing Indian Point would result in approximately a 15% increase in carbon emissions and roughly a 7-8% increase in nitrous oxide (NOx) emissions throughout both New York City and State. In order to make up for both the 2069 megawatts of power and the grid support provided by Indian Point, several new natural gas plants would need to be built in and around Westchester County.

The emissions from these plants would further degrade Westchester County's air quality, which consistently has been found in violation of federal standards. While natural gas is cleaner than coal, it still emits large amounts of carbon and nitrous oxides. Carbon dioxide (CO2) has been linked to global warming and climate change, while nitrous oxide (NOx) is a key precursor of both ground-level ozone and smog.

Template Revy-038

DS-03

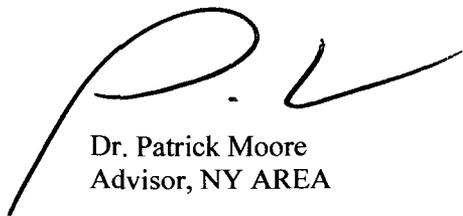
The Hudson Valley's three existing fossil fuel power plants are among the largest contributors to air pollution in the region. These plants, many of which are located in environmental justice areas, emit soot and other particulate pollution into the air. Exposure to smog is a leading cause of aggravated respiratory illnesses such as asthma, decreased lung function and bronchitis. 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 region. Any reduction in air quality would worsen what is already a serious public health problem.

New York already has a very attractive electricity portfolio, and we should build upon that foundation. Nuclear generators provide 30 percent of the state's electricity, while another 20 percent comes from hydro. Given this, and the widespread use of mass transit in the state, New York has one of the lowest CO2 per capita ratios in the country. New York's six nuclear power plants provide 30 percent of the state's electricity. As these are base load facilities which operate 24/7, renewable power from intermittent sources like wind can supplement this generation, however Indian Point is a crucial base load power provider, supports the electric grid, and ensures reliability throughout the region.

Indian Point is essential to protecting air quality, the environment, and the lives of individuals who live in designated environmental justice areas. Its continued operation ensures that we continue to have enough power to support our growing demand for electricity in New York while also keeping our air clean. For these reasons, I urge you to renew the operating licenses for Indian Point Units 2 and 3.

Thank you for your consideration of my comments.

Sincerely,



Dr. Patrick Moore
 Advisor, NY AREA

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