

RAS E-1341



VILLAGE OF SUFFERN
OFFICE OF
THE MAYOR
DAGAN LaCORTE

DOCKETED
USNRC

January 10, 2013 (2:30 p.m.)
OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

61 Washington Avenue
Suffern, New York 10901

(845) 357-2600
FAX (845) 357-0649
mayor@suffernvillage.com

December 31, 2012

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

Re: Entergy Nuclear Operations, Inc. (Entergy) to renew its operating licenses for Indian Point Nuclear Generating Units 2 and 3 (Operating License Nos. DPR-26 and DPR-64) at its Indian Point Energy Center in Buchanan, New York

Dear Sir/Madam:

I write in opposition to the above-referenced renewal application of Entergy. The Village of Suffern is located approximately 12.7 miles from the site. I express my opposition to the renewal permit because of the apparently public safety issues related to the continued use of Indian Point to the residents of the Village of Suffern and, indeed, the entire County of Rockland. First and foremost, any contention that an adequate evacuation plan has been formulated is a fallacy. It was erroneous to locate a nuclear energy facility in such a heavy populated area in the first place. However, to contend that residents could safely and effectively be evacuated should it become necessary is to ignore the density of population in the area, the intensity of traffic congestion and common sense. This is particularly troubling because approximately 25 million people live within 50 miles of the facility. Because the residents unquestionably could not be safely and successfully evacuated, the renewal application is deficient and should be denied.

The regulations for reactors built after 1997 require that every site must have an exclusion area and a low population zone. 10 C.F.R. § 100.21(h). These regulations define low population zone as "the area immediately surrounding the exclusion area which contains residents, the total number and density of which are such that there is a reasonable probability that appropriate protective measures could be taken in their behalf in the event of a serious accident." 10 C.F.R. § 100.21(h). Approximately 300,000 people reside within ten miles of Indian Point and the sole means of evacuation are primarily one and two lane

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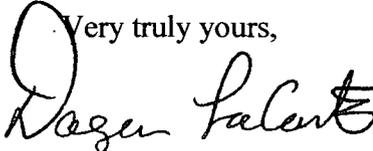
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roads. The regulations do not specify a permissible population density or total population within this zone because the situation may vary from case to case. The regulations further relate that whether a specific number of people can, for example, be evacuated from a specific area, or instructed to take shelter, on a timely basis will depend on many factors such as location, number and size of highways, scope and extent of advance planning, and actual distribution of residents within the area. *Id.* As far as Indian Point is concerned, there is no low population zone, therefore if Entergy were applying to build a new nuclear power plant as opposed to seeking relicensing, it is unlikely that the license would be approved.

Moreover, numerous additional issues exist that have not been adequately addressed, including the fact that the facility is located near two fault lines. To the best of my knowledge, the applicant has not demonstrated that the facility was adequately designed and constructed to withstand a serious earthquake. Further, the facility is nearly forty years old and much of the technology used in building it is now obsolete. The danger of radiation leaks is obvious and documented. Additionally, given its proximity to the population of New York City and the metropolitan area, the facility is a potential target for terrorists. Again, there has been no demonstration of sufficient security or of construction sufficient to withstand such a hypothetical attack.

Numerous other deficiencies have been identified in the comments on the DSEIS which further weigh against approval of the application.

Thank you for your consideration.

Very truly yours,


Dagan LaCorte
Mayor