



March 8, 2013

Dr. Keith McConnell  
Director, Waste Confidence Directorate  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Andy Imboden, Branch Chief  
Communications, Planning and Rulemaking Branch  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**Re: NRC Waste Confidence Update – Request for Public Meeting**

Dear Dr. McConnell and Mr. Imboden:

Riverkeeper is writing to request that the NRC convene a public meeting in the vicinity of the Indian Point nuclear power plant to discuss NRC's draft Waste Confidence Environmental Impact Statement and Rule.

NRC's notice of environmental scoping for the agency's Waste Confidence Update specifically requested "public input on potential locations for future public meetings on the draft EIS."<sup>1</sup> On January 2, 2013, Riverkeeper, along with a coalition of other concerned citizen groups, commented upon the need for adequate regional meetings concerning NRC's forthcoming draft EIS.<sup>2</sup> This request is eminently reasonable and must be heeded in order for affected and concerned communities to have a full and fair opportunity to inform NRC's environmental review process concerning "waste confidence." On February 11, 2013, Riverkeeper's president, Paul Gallay, had the occasion to meet with NRC Chairwoman Allison Macfarlane, during which

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<sup>1</sup> See Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation, RIN 3150-AJ20, 77 Fed. Reg. 65,137, 65,139 (Oct. 25, 2012).

<sup>2</sup> See Comments by Alliance for Nuclear Accountability, Beyond Nuclear, Blue Ridge Environmental Defense League, Center for a Sustainable Coast, Citizens Allied for Safe Energy, Citizens Environmental Alliance, Don't Waste Michigan, Ecology Party of Florida, Friends of the Earth, Georgia Women's Action for New Directions, Hudson River Sloop Clearwater, Missouri Coalition for the Environment, NC WARN, Nevada Nuclear Waste Task Force, New England Coalition, Nuclear Information and Resource Service, Nuclear Watch South, Physicians for Social Responsibility, Public Citizen, Riverkeeper, San Luis Obispo Mothers for Peace, SEED Coalition, Sierra Club Nuclear Free Campaign, and Southern Alliance for Clean Energy on Scope of Waste Confidence Environmental Impact Statement (Jan. 2, 2013), at 18-19, available at, <http://action.psr.org/documents/eis-comments.pdf>.

he further specifically requested a regional meeting near Indian Point to apprise the public about NRC's review of nuclear waste storage. Riverkeeper now writes to follow-up upon this request and recommend and stress the importance of holding a public meeting near the Indian Point plant.

The large quantity of high level radioactive waste that is currently stored, and which continues to be generated, at the Indian Point nuclear power plant is the source of much concern to the communities surrounding the facility. The spent nuclear fuel at the plant is stored in either overly dense pools that have had a documented history of leaking radioactive water to the environment and which are at risk for devastating fires, or in dry casks that, lined up along the shores of the Hudson River, are vulnerable to sabotage or earthquake damage. The prospect of decades of, or indefinite "temporary" storage of, thousands of tons of nuclear waste at Indian Point poses numerous significant environmental and safety risks to the surrounding public. This is due in large part to the unique location of Indian Point, that is, adjacent to critical ecological habitat in Haverstraw Bay, just 24 miles north of New York City, and infamously having one of, if not the single highest population densities surrounding a nuclear power plant in the U.S. The long-term integrity of aging onsite storage structures, the catastrophic health and environmental consequences of potential spent fuel pool fires and/or leaks, the ability of pools and dry casks to withstand seismic activities and other natural disasters, and other relevant issues, are of much concern to the citizens who reside or work near Indian Point in Westchester County, New York City, as well as Connecticut. Notably, approximately 6,100 Riverkeeper constituents alone, reside within 50 miles of the Indian Point plant.

Accordingly, it is critical that the public around Indian Point be given the opportunity to meet in-person with representatives of the NRC and voice questions and concerns relating to NRC's "waste confidence" rulemaking and draft EIS. Riverkeeper respectfully suggests that NRC schedule such a meeting in White Plains, NY, as it is in Westchester County where the Indian Point plant is located, and also easily accessible by train from New York City and northern Westchester.

Please do not hesitate to contact us with any questions concerning Riverkeeper's request. Riverkeeper is happy to discuss this matter further, and/or provide any additional information if necessary.

Respectfully,



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Phillip Musegaas, Esq.  
Hudson River Program Director

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