Rulemaking1CEm Resource

From: RulemakingComments Resource
Sent: Monday, December 16, 2013 3:06 PM
To: Rulemaking1CEm Resource
Subject: FW: Docket ID NRC-2012-0246

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SECY DOCKET DATE: 11/6/13
TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel
COMMENT#: 00378

-----Original Message-----
From: Riverkeeper [mailto:info@Riverkeeper.org] On Behalf Of Jocelyn Decrecsenzo
Sent: Wednesday, November 06, 2013 10:27 PM
To: RulemakingComments Resource
Subject: Docket ID NRC-2012-0246

Nov 6, 2013

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

ATTN: Secretary Rulemakings and Adjudications Staff,

I am writing today to urge the New York State Department of State to object to Entergy's unfounded certification that a proposed 20 year license extension for its Indian Point nuclear power plant is consistent with NYS's Coastal Management Program and enforceable NYS coastal zone policies.

Indian Point is an outdated, unsafe, and environmentally destructive nuclear plant, which inflicts severe and unnecessary impacts to the ecologically significant coastal resources of NYS. If Indian Point operates for an additional 20 years, it will continue to devastate, as well as pose an incredible risk to, NYS coastal areas.

I encourage you to carefully consider the numerous ways in which the continued operation of Indian Point would be inconsistent with various of NYS's coastal policies, including, but not limited to, the following:

-- Policy 7: The protection, preservation, and restoration of significant coastal fish and wildlife habitats: Indian Point's antiquated cooling water intake structure, located in the vicinity of the designated significant fish and wildlife habitat of Haverstraw Bay, slaughters millions of aquatic organisms in Hudson River every year. Decades of such devastation has contributed to the decline of 10 out of 13 key species in the river. If Entergy were to continue running the plant the way they want to, it would result in ongoing impacts, and clearly not in the protection, preservation, and restoration of significant coastal fish and wildlife habitats.

-- Policy 8: The protection of fish and wildlife resources from hazardous wastes and pollution: 1,500+ tons of "spent"
nuclear waste from Indian Point currently sit on the banks of the Hudson River. Should Indian Point continue to operate, the plant will generate approximately 1,000 additional tons of waste to also be stored at the site. This waste, which is largely in tightly packed, degraded, leaking, and highly radioactive waste storage pools, poses an exceptional risk of accident and attendant large scale release of radiation to the surrounding coastal area, and demonstrably not in the protection of NYS coastal resources from hazardous pollutants.

-- Polices 9 & 19: Protection and expansion of recreational uses of and access to coastal resources: Historic and rampant radiological leaks from spent fuel pools, buried pipes, and other structures at Indian Point since the 1990s have resulted in extensive plumes of contamination underlying the site. These plumes include highly toxic radionuclides that are known to bioaccumulate in aquatic organisms and interfere with human health. Entergy's solution? Let the plumes leach into the Hudson River. This has been happening for years and will continue for decades, especially as the plant continues aging, breaking down, and leaking additional radioactivity to the environment.
Entergy's complacency completely fails to assure the protection of NYS coastal resources for recreational activities, such as fishing and swimming.

The proposed continued operation of Indian Point violates letter and intent of these, as well as other, NYS coastal policies. I, thus, urge you to ensure that Indian Point is disallowed to continue operating at the expense of NYS coastal resources by strongly objecting to Entergy's entirely unjustified coastal consistency certification.

Thank you for your consideration.

Respectfully,

Ms. Jocelyn Decrecsenzo
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