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ALBANY

SANDRA R. GALEF  
Assemblywoman 95<sup>th</sup> District

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January 15, 2015

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

✓ Honorable Allison M. Macfarlane  
Chairman  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16G4  
Washington, DC 20555-0001

Re: Project Docket Number **CP14-96-000**

Dear Secretary Bose & Chairman Macfarlane,

I am writing to let you know of my serious concerns about the safety of siting the AIM pipeline in close proximity to the Indian Point Energy Center. I have conferred with gas pipeline and nuclear experts, as well as the NRC about their risk analysis and conclusion regarding the proximity of this very large high pressure pipeline to a nuclear power plant.

While the NRC analysis has concluded that Indian Point would not be threatened in the event of a complete pipeline rupture, based on the experts I have conferred with, I believe this may be based on unrealistic assumptions and severely underestimating the ability of the gas to stop flowing to the site in very short order.

As such, I believe it is prudent and in the best interests of the public's health and safety to require an independent risk analysis of the ramifications of a 42" gas pipeline rupture at the proposed AIM site.

Richard Kuprewicz, President of Accufacts Inc., has submitted to the FERC docket twice now his concerns regarding the Safety Evaluation and Analysis of the Indian Point Nuclear Power Plant submitted by Entergy as NRC's follow-on analysis, finding it seriously deficient and inadequate. Based on his assessment of the information NRC provided to elected officials regarding the NRC's own analysis, I am calling for an independent risk analysis to be performed by those with both gas pipeline as well as nuclear power plant expertise.

Given the seriousness of the issues that have been raised, I urge you to require this independent risk assessment and request that you delay any potential approval of the pipeline until that is complete. Please see the attached letter from Accufacts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sandra R. Galef', written in a cursive style.

Sandra R. Galef  
NYS Assemblywoman, 95<sup>th</sup> District

Att.

Cc: Joseph Martens, Commissioner, NYS Department of Environmental Conservation, 625  
Broadway  
Albany, NY 12233-1011

## **Accufacts Inc.**

“Clear Knowledge in the Over Information Age”

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**December 30, 2014**

**To: Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426**

**Re: *Algonquin Gas Transmission, LLC*, Docket No. CP14-96-000  
Concerns Related to Incomplete Risk Assessment Associated with the Proposed New  
AIM Project 42-inch Gas Transmission Pipeline in Proximity to the Indian Point  
Nuclear Plant Facilities**

In an earlier submission to FERC on the above AIM Project Docket, Accufacts Inc. raised the concern related to the possible location of the new 42-inch gas transmission pipeline in proximity to the Indian Point Nuclear Power facilities (“IP”).<sup>1</sup> Accufacts’ findings, based on information disclosed by the risk assessment performed for IP included certain statements and assumptions that raised serious concerns to Accufacts, should the 42-inch gas pipeline rupture in proximity to IP. The risk assessment appears to not capture the true transient dynamics associated with a gas transmission pipeline rupture, especially as they apply to the Algonquin system post AIM at this location. Quite frankly, the risk assessment appears seriously incomplete, even dismissive, and provides little confidence as to its adequacy in this highly specialized area of expertise. Accufacts stated in its previous Report to FERC:

**“The Entergy-submitted Safety Evaluation and Analysis for the Indian Point Nuclear Plant (“IPEC”) concerning the risk associated with the 42-inch AIM pipeline is seriously deficient and inadequate.”<sup>2</sup>**

Since issuance of the Accufacts Report, additional information was provided to Accufacts by local officials who were told the information could be shared. This additional information was identified as a Resource Report 11, “Reliability and Safety,” filed with FERC by Algonquin in February 2014 concerning the AIM Project and was reviewed by Accufacts. This additional information only served to raise further concerns that an independent, thorough, and experienced rupture transient analysis has not been performed for the 42-inch proposed pipeline in the vicinity of IP. Accufacts would advise, for example, that minimum federal pipeline safety

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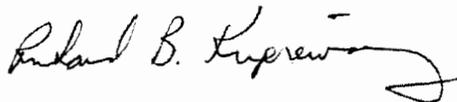
<sup>1</sup> FERC Docket CP14-96 Accession # 20141121-5078, filed by the Town of Cortlandt on 11/21/2014 containing a public redacted version and a full version (CEII protected) of the Accufacts Report (“Report”), dated 11/3/14, pp. 8-9.

<sup>2</sup> *Ibid.*, pp. 8 – 9

regulations do not adequately define the placement or operation of remote control shutoff valves in such a sensitive area. In addition, confusion related to the transient dynamics of gas pipeline rupture on this system can cause a response, even by well-meaning control center personnel, or the operation of even the best of intended remote control shutoff valves triggered by pressure loss, to be seriously delayed, considerably increasing the duration of very high heat flux energy releases associated with large diameter pipeline ruptures (such as the proposed 42-inch).

Accufacts has no idea at this time as to whether IP could safely endure a nearby 42-inch gas transmission pipeline rupture and failsafe shutdown, but based on very unclear information provided to date, a truly independent safety hazard analysis (such as a HAZOP) by those experienced in gas transmission pipeline rupture transients incorporating Algonquin system rupture dynamics in this pipeline segment, while evaluating critical IP failsafe infrastructure locations that might be affected is warranted.<sup>3</sup> Such an assessment needs to carefully consider the possibility of rupture failure linkage interactions with IP equipment that might drive IP to a catastrophic IP event.

Accufacts also appreciates the need for some sensitivity in restricting access to critical infrastructure information, some of extreme sensitivity that may be needed to perform such a thorough analysis. However, such secrecy should not be allowed to cloak inadequacies in risk assessments or assumptions. A mechanism similar to the CEII process should be able to be devised that would assure the public, especially concerned elected officials, that such risk assessments are truly representative of what could happen in a pipeline rupture at this highly sensitive location. A thorough and independent risk assessment that can be independently verified and communicated by local officials to the public is definitely needed and warranted in this matter.



Richard B. Kuprewicz  
President  
Accufacts Inc.

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<sup>3</sup> HAZOP stands for Hazard and Operability Study, a structured and systemic examination of processes to minimize possible catastrophic failures.

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