

# PUBLIC SUBMISSION

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**Comment On:** NRC-2008-0672-0029

Entergy Nuclear Operations, Inc.; Indian Point Nuclear Generating Unit Nos. 2 and 3; Draft Supplemental Environmental Impact Statement; Request for Comment

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RULES AND DIRECTIVES

## General Comment

As a resident of New York City, I am deeply concerned with the security and operations of this facility.

In the 12 years that I have lived here, tritium has been detected in wells on site. In this day and age, when the municipal water sources of so many cities are now being destroyed by illegal dumping of various substances, I am not confident that Entergy is going to do any better of a job protecting our waterways.

The security protocol for Indian Point assumes the possibility of only one strike team attempting to breach security. There were 19 people involved in the attacks on September 11th 2001. How does Entergy expect a team of five to protect this facility? This is unacceptable.

The following is a list of safety problems that Indian Point has had since the day it was built:

In 1973, five months after Indian Point 2 opened, the plant was shut down when engineers discovered buckling in the steel liner of the concrete dome in which the nuclear reactor is housed.[27]

On October 17, 1980,[28] 100,000 gallons of Hudson River water leaked into the Indian Point 2 containment

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building from the fan cooling unit, undetected by a safety device designed to detect hot water. The flooding, covering the first 9 feet of the reactor vessel, was discovered when technicians entered the building. Two pumps which should have removed the water were found to be inoperative. NRC proposed a \$2,100,000 fine for the incident.

In February 2000, Unit 2 experienced a Steam Generator Tube Rupture (SGTR), which allowed a small amount of primary water to leak into the secondary system through one of the steam generators.[29] All four steam generators were subsequently replaced.

In 2005, Entergy workers while digging discovered a small leak in a spent fuel pool. Water containing tritium and strontium-90 was leaking through a crack in the pool building and then finding its way into the nearby Hudson River. Workers were able to keep the spent fuel rods safely covered despite the leak.[30] On March 22, 2006 The New York Times also reported finding radioactive nickel-63 and strontium in groundwater on site.[31]

In 2007, a transformer at Unit 3 caught fire, and the Nuclear Regulatory Commission raised its level of inspections, because the plant had experienced many unplanned shutdowns. According to The New York Times, Indian Point "has a history of transformer problems".[5]

On April 23, 2007, the Nuclear Regulatory Commission fined the owner of the Indian Point nuclear plant \$130,000 for failing to meet a deadline for a new emergency siren plan. The 150 sirens at the plant are meant to alert residents within 10 miles to a plant emergency. Since 2008, a Rockland County-based private company has taken over responsibility for the infrastructure used to trigger and maintain the ATI siren system. The sirens, once plagued with failures, have functioned nearly flawlessly ever since.[32]

On January 7, 2010, NRC inspectors reported that an estimated 600,000 gallons of mildly radioactive steam was intentionally vented to the atmosphere after an automatic shutdown of Unit 2. After the vent, one of the vent valves unintentionally remained slightly open for two days. The levels of tritium in the steam were within the allowable safety limits defined in NRC standards.[33]

On November 7, 2010, an explosion occurred in a main transformer for Indian Point 2, spilling oil into the Hudson River.[34] Entergy later agreed to pay a \$1.2 million penalty for the transformer explosion.[5]

July 2013, a former supervisor, who worked at the Indian Point nuclear power plant for twenty-nine years, was arrested for falsifying critical safety records and lying to federal regulators.

On May 9, 2015, a transformer failed at Indian Point 3, causing the automated shutdown of reactor 3. A fire that resulted from the failure was extinguished, and the reactor was placed in a safe and stable condition.[35] The failed transformer contained about 24,000 gallons of dielectric fluid, which is used as an insulator and coolant when the transformer is energized. The U.S. Coast Guard estimates that about 3,000 gallons of dielectric fluid entered the river following the failure.[36]

In June, 2015, a mylar balloon floated into a switchyard, causing an electrical problem resulting in the shutdown of Reactor 3.

In July 2015, Reactor 3 was shut down after a water pump failure.

On December 5, 2015, Indian Point 2 was shutdown after several control rods lost power.

On 6 February 2016, Governor Andrew Cuomo informed the public that radioactive tritium-contaminated water leaked into the groundwater at the Indian Point Nuclear facility.[37] There are also environmental considerations beyond the radioactive leaks and oil spills. The cooling system kills over a billion fish eggs and larvae annually. Indian Point, however, claims their studies show that there is no problem. This leaves me even less confident in this company.