

PUBLIC SUBMISSION

As of: 3/7/16 3:38 PM
Received: March 04, 2016
Status: Pending Post
Tracking No. 1k0-8ob9-fwk9
Comments Due: March 04, 2016
Submission Type: Web

Docket: NRC-2008-0672

Environmental Impact Statement; Availability, etc.: Indian Point Nuclear Generating Unit Nos. 2 and 3, Buchanan, NY; License Renewal and Public Meeting

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

Document: NRC-2008-0672-DRAFT-0036

Comment on FR Doc # 2015-32777

12/29/2015
80 FR 81377

18

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 2016 MAR -7 PM 3:30
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General Comment

COMMENTS OF THE INDIAN POINT SAFE ENEGY COALITION TO DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR LICENSE RENEWAL OF NUCLEAR PLANTS - SUPPLEMENT 38 REGARDING INDIAN POINT (March 4, 2016)

In Dec 2013, the Indian Point Safe Energy Coalition delineated the unsupported and invalid assumptions contained in the Draft GEIS and presented a lengthy annotated list of support References. We hereby reference and incorporate IPSEC's GEIS Comments herein, since every single flaw noted with respect to the GEIS remains or is amplified in the SEIS.

In the Coalition's GEIS Comments, we also made a genuine entreaty to your staff. We wrote as citizens in the hope that the NRC was not an entirely industry captured agency and our message would reach individuals who see themselves, not just as actors in a bureaucracy, but as true public servants.

We know those individuals work at the NRC. We have met them. But something is seriously amiss at the Commission when it issues a document as utterly empty of analytical substance as is this SEIS.

Frankly, to describe the shoddy and inert nature of the "analysis" presented in the SEIS would involve just cutting and pasting the entire document into these Comments.

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E-RIDS= ADM-03
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So we will simply list here - for the public record and consideration - risks the SEIS deems inconsequential:

1. The possibility of major catastrophic accident at Indian Point.
2. Indian Point's location: the most populated and most densely populated region of any nuclear plant in the nation, with 300,000 people living within 10 miles, 1 million within 20, and over 17 million within 50.
3. The likelihood a catastrophic radiation release could render large segments of the NY Metropolitan Region uninhabitable for decades, even centuries.
4. The fact an accident - even a mitigated one - could contaminate a reservoir source of NYC drinking water and severely contaminate the Hudson River for centuries.
5. The problem-plagued operational history of Indian Point during its first 40 years of operation.
6. The fact NRC oversight has failed to prevent the multiple fires, explosions, electrical problems, cooling system malfunctions, clogged water intakes, debris clogged switchgear room drains, boric acid corrosion, reactor control rod malfunctions, emergency backup generator failures, emergency communication system failures, alarm malfunctions, computer software problems, pipe breaks, and radiation leaks at Indian Point in the past. (Rest assured the NRC will catch every problem in time.)
7. All the natural and man-made disaster risks most specifically applicable to the site: earthquake; flooding (including from dam burst); extreme storms; fires; cyber-related dangers, and the hazard of the near proximity to high-pressure gas pipelines.
8. Terrorism. (The NY Metro area is a top terror target. The 9/11 Commission revealed Indian Point was actually considered by the attack team leader. But let's continue to remain oblivious to the homeland security peril.)
9. The high-level nuclear waste at the site - including the 2 times as hot and radioactive high burnup fuel - which will continue to mount every single year the plant continues operation.
10. The non-robust spent fuel pools, which have already experienced deterioration, are inaccessible to full inspection, and are now reconfigured to hold more than 5 times the amount of waste for which they were originally designed.
11. The full cumulative health and environmental impacts of additional decades of radioactivity emitted into the environment. (At this point representations of impact being "small" or "moderate" are prima facie unfounded, since monitoring data is minimal and population health data unassessed.)
12. The environmental and health toll exacted by the full nuclear fuel cycle; including BTU impact, surface and groundwater despoliation, the substantial contribution of greenhouse gases, and the disproportionate burden placed on Native American and other environmental justice communities - especially in connection with uranium mining, fuel processing and radioactive waste disposition.

An honorable and honest SEIS for Indian Point would have make these points clear. The Commission's failure to do so does not bury the untenable risk this plant presents to millions of Americans. All it does is expose the subservience of this agency to the industry it purports to regulate.

You have violated the public trust and you are putting our lives our communities and our children's futures at risk.