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General Comment

March 4, 2016

To Those Concerned:

I am writing on behalf of the New York Affordable Reliable Energy Alliance (New York AREA) to express support for, and also to urge supplementation and further revision of, the Nuclear Regulatory Commission's (NRC) revisions to the Generic Environmental Impact Statement (GEIS) for Indian Point Energy Center's (IPEC) Units 2 and 3, as outlined in NUREG-1437, Supplement 38, Volume 4, draft supplement to final.

Regarding air quality impact (all plants), the revised supplement takes into consideration air quality impact from continued operation of IPEC, as opposed to the previous version of the GEIS, which only considered the air quality impact during refurbishment. In the revision, the adverse air quality impact from continued operation of IPEC is adjudged to be small.

6-L19-1

However, in addition to supporting this benign assessment of the potential harm to air quality posed by IPEC's continued operation, we urge that the revised language be supplemented with language that in fact describes

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the major benefits that accrue to our air from the continued operation of IP2 and IP3. The further revision we propose should reflect the fact that IPEC provides 25 percent of the electricity for New York City and Westchester County, more than 2000 megawatts, with virtually zero emissions of carbon dioxide, nitrogen oxides, sulfur dioxide, or particulates. IPEC reduces carbon dioxide emissions by 8.5 million metric tons annually, the equivalent of taking 1.6 million cars off the road.

6-L19-1
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These are substantive considerations, because by so significantly eliminating emissions that would otherwise be made by fossil fuel generation which is the only feasible current substitute for IPEC's baseload power in the event of its closure IPEC's continued operation prevents significant numbers of hospitalizations and deaths from asthma and other respiratory and pulmonary disorders. These benefits are of direct relevance and importance to the decision regarding renewal of IPEC's license, and the NRC should include consideration of these benefits in its EIS.

New York AREA urges, therefore, that NRC consider modifying the five impact conclusions presented in Table 9-1 (Summary of Environmental Significance of License Renewal and Alternatives) about IPEC's environmental impact to reflect these benefits (please see the list below). With regard to the first category, we agree that the term "small" is accurate in context regarding the magnitude of risk of detriment to air quality, but it would be even more accurate to describe IPEC as having large benefits and its loss to have large detrimental effects--due to its production of industrial-strength baseload power virtually emissions-free, unlike any feasible alternatives. For the same reasons, with regard to the second through fifth categories, we disagree with NRC's conclusions, as is detailed in the following list:

6-L19-2

- 1) "License Renewal": IPEC's potential negative impact is small, but its positive impact is large
- 2) "Plant Shutdown": the negative environmental impact of loss of IPEC would be not be small; it would be large
- 3) "New Closed Cycle Cooling": this is a plant shutdown scenario, which would cause a large loss of environmental benefits
- 4) "NGCC at the IP Site or a Repowered Site": this alternative would cause a large loss of environmental benefits and would increase emissions in a nonattainment area
- 5) "NGCC at a New Site": this alternative would cause a large loss of environmental benefits and would increase emissions in a nonattainment area

We appreciate that NRC must thoughtfully consider many factors in license renewal. For those of us who live in New York City and Westchester County, the prospect of losing IPEC is not a theoretical construct; it would mean breathing air that would contain millions of tons of pollutants that only IPEC's continued operation spares us. It would mean more illness and deaths from asthma and respiratory and pulmonary disorders. This kind of environmental impact is all too real.

6-L19-3

Indian Point's continued operation reduces New York's need for fossil fuels. In light of New York's often poor air quality and continuing non-compliance with the federal Clean Air Act, it is imperative that IPEC's license be renewed.

Thank you for giving these crucial issues your most thoughtful consideration.

Sincerely,

Arthur "Jerry" Kremer

Chairman, New York Affordable Reliable Electricity Alliance
Member of Assembly (Ret.), 1966-1988