

RAS E-1227



DOCKETED
USNRC

September 17, 2012 (4:25 p.m.)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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C. SCOTT VANDERHOEF
County Executive

September 15, 2012

Office of the Secretary
Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

To Whom It May Concern:

As Rockland County Executive, I represent a county of more than 311,000 residents, including approximately 125,000 who live within the ten-mile Emergency Planning Zone (EPZ) directly across the Hudson River from the Indian Point nuclear power plants in Buchanan, NY.

Like my counterparts in Westchester, Putnam and Orange Counties, I am responsible for the safety and security of the people I represent. Although Rockland enjoys an enviable record with respect to its ability to respond to emergency situations, the safety of Rockland residents cannot be guaranteed in the event of a major emergency at Indian Point that would require our residents to take protective actions (i.e. evacuation). It is for this reason, and for others cited below, that I urge the Nuclear Regulatory Commission (NRC) to deny Entergy's application for a 20-year license extension for the two operating nuclear reactors, IP-2 and IP-3 at the Indian Point Energy Facility.

There have been numerous operational issues that cause grave concern about the safety of our residents. The Indian Point Energy Facility has a history of serious problems including two incidents that escalated to Alert status. Other incidents include a transformer fire, which resulted in a substantial oil spill into the Hudson River, a major steam pipe rupture, a clogged cooling system intake and a spent fuel rod pool that was found to be leaking tritium into the ground water. Such problems illustrate the deterioration of an aging and outdated facility that can no longer be called "safe and secure." In addition, the plant's spent fuel pools are dangerously overcrowded.

These objections do not begin to address security concerns in a post 9-11 world, including the possible threat of a terrorist attack on the facility, the proximity of Westchester Airport and associated air traffic, and the increase in air traffic over Rockland and Westchester Counties associated with the New York/New Jersey/Philadelphia Airspace Redesign Project. Furthermore, the nuclear emergency at Fukushima has raised concern about locating reactors in highly populated areas.

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The normal risks associated with operating a nuclear power plant increase proportionally when such a facility is located near a densely populated area like Rockland County, and indeed, the entire area in the four-county EPZ. Rockland County is unique in the fact that it is home to many public parks and the Palisades Center Mall, which could contribute to temporarily increasing the county's transient population by more than 100,000 people within the EPZ during certain times of the year.

Our present road infrastructure, which includes major transportation corridors including the New York State Thruway, the Palisades Interstate Parkway, and many state highways, cannot adequately handle a mass evacuation in a short period of time – under three hours. In the final analysis, I do not have enough confidence in our ability to ensure the safety our residents in the event of a major calamity at Indian Point.

I understand that the logistics of evacuations and the safety of surrounding communities is not normally taken into account by the NRC when reviewing for re-licensing. Nevertheless, taking the points made above into consideration, I strongly urge the Nuclear Regulatory Commission to deny Entergy's application for a license extension for its two nuclear reactors at the Indian Point Energy Facility.

Sincerely,



C. Scott Vanderhoef
COUNTY EXECUTIVE

Docket, Hearing

From: C. Scott Vanderhoef [VanderhS@co.rockland.ny.us]
Sent: Monday, September 17, 2012 4:25 PM
To: Siarnacki, Anne; Docket, Hearing
Cc: Sue Cerra; Daniel Greeley
Subject: NRC re-licensing
Attachments: nrcseptrelicensing.pdf

Please see the following attached statement on the re-licensing of Indian Point Facility.

Thank you

Scott Vanderhoef
ROCKLAND COUNTY EXECUTIVE

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