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OFFICE OF SECRETARY
RULEMAKINGS AND
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I strongly urge the Nuclear Regulatory Commission to deny Entergy's application for a 20-year license extension for the two operating nuclear reactors at Indian Point Energy Facility in Buchanan, NY.

Indian Point is located in a heavily populated region of the country and identified as one of the most dangerous nuclear plants in the nation, according to the Nuclear Regulatory Commission (NRC) itself. New York City is just 25 miles south of the plant. Over the years we have witnessed serious nuclear accidents at Chernobyl and Three Mile Island, and most recently at Fukushima. In August 2011, New York experienced the effects of an earthquake, Hurricane Irene, and a tornado all in one week. It is no longer prudent to believe that "It can't happen here."

The following issues, even when considered individually, merit the denial of any extension of Indian Point's operation.

A History of Serious Problems: The plant has a history of multiple transformer explosions, a major steam pipe rupture, clogged cooling system intakes, repeated siren failures - and is a sitting target for terrorism.

Dangerously Over-Crowded Fuel Pools: The plant's spent fuel is highly radioactive and contains about three times the radioactivity as Fukushima's spent fuel pools. Spent fuel assemblies are densely packed into severely over-crowded fuel pools that are housed in totally unprotected metal storage buildings and are leaking radioactivity into the Hudson River.

On-Site Waste Storage: When the plant was first licensed, it was widely believed that the federal government would open a national waste depository at Yucca Mountain. That option is no longer under consideration and there is no other repository on the horizon. Indian Point is now storing 1,500 tons of highly-radioactive spent nuclear waste on-site, and would add an additional 1,000 tons if the plant is relicensed for another 20 years.

Health and Environmental Impacts: Studies have shown increased rates of cancer and other illnesses related to exposure from planned and unplanned releases of radioactivity. Indian Point's once-through cooling system uses 2.5 billion gallons of water a day from the Hudson River, seriously impacting a still declining fish population.

Evacuation is Impossible: Even if the possibility of an earthquake, a terrorist attack, or a fuel pool fire or other accident at Indian Point is remote, the consequences of a serious problem at Indian Point would be devastating. Approximately 20 million people live or work within 50 miles of Indian Point and there is no evacuation plan for New York City. Within minutes of an accident or incident at Indian Point, gridlock would occur making evacuation impossible.

Nuclear power is being replaced by energy efficiency and renewables, re-powering and improved storage and transmission capability. Governor Cuomo's Energy Highway is currently addressing ways to bring excess power, including 4,000 megawatts of wind in the western part of the State, to the greater NY metropolitan area. In January 2012, the NYS Assembly Committee on Energy concluded that there is more than enough power to allow Indian Point to close without overburdening ratepayers or threatening reliability standards.

To re-license Indian Point in its present location and condition defies logic. To do so is playing a dangerous game of Russian roulette with our lives and future, when safer, cleaner alternative, including strong conservation measures, are immediately available.

I appreciate your consideration of these comments.

Sincerely,



Patricia Wood
Executive Director

cc: Administrative Judge Lawrence G. McDade
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