

September 15, 2012

RAS E-1317

Office of the Secretary, Rulemakings and Adjudications
Staff, U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001
Fax: (301) 415-1101 Email: hearing.docket@nrc.gov

I am writing to urge the Nuclear Regulatory Commission to deny Entergy's application for a 20-year license extension for the two operating nuclear reactors, IP-2 and IP-3, at Indian Point Energy Facility in Buchanan, NY. Indian Point is located in the most densely 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. 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."

There are many factors that make Indian Point's relicensing flawed, and make denying it imperative, including:

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 leaking radioactivity into the Hudson.

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 its 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.

Replacement Energy is Readily Available: Nuclear power is being replaced by energy efficiency and renewables, repowering 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 relicense 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 alternatives are immediately available.

Thank you for considering these comments.

Sincerely, *Judith Mercer*

cc: Administrative Judge Lawrence G. McDade
c/o Anne Siarnacki, Law Clerk; Atomic Safety and Licensing Board Panel, Mail Stop T-3F23
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001
Fax: (301) 415-5599 Email: anne.siarnacki@nrc.gov

Template Aug-038

DS-03