

Paul M. Blanch PE
Energy Consultant

6 May 2020

Congresswoman Nita Lowey
Assemblywoman Sandy Galef
Senator Peter Harckham
Assemblyman David Buchwald

SUBJECT: Ensure the NRC publicly releases Entergy's revised Algonquin gas pipelines analysis on June 30th

Dear Congresswoman Lowey, Assemblywoman Galef, Senator Harckham and Assemblyman Buchwald,

I am writing to you to implore you to write to NRC Commissioner Svinicki requesting a copy of Entergy's revised 50.59 risk analysis for the Algonquin gas pipelines at Indian Point on the date that they produce it, June 30th, 2020. It is critical that you, the NYS PSC, the public and the Indian Point Decommissioning Task Force review it without delay.

The NRC's Office of the Inspector General event report (OIG 16-024) on February 13, 2020 stated: "it may be prudent to redo the analysis¹."

Sandia Natural Laboratories, a contractor to the NRC's Expert Evaluation Team stated in its evaluation: "At approximately 6 to 7 minutes after release the flammability region of the vapor cloud will be either near or begin to engulf the SOCA and can result in an explosion with a high likelihood of exceeding an overpressure of 1 psi at the SOCA if ignited within the flammability region. The furthest point downwind distance within the flammability region is about 950 m (3,100 ft) at 8 minutes which is greater than any distance from the pipeline route to the SOCA (Security Owner Control Area) which varies from about 1580 ft to 2363 ft."

¹ It is not the responsibility of the OIG to direct the NRC Staff on how or to redo the analysis however logic would dictate a reasonable professional engineer would conduct the analysis in accordance with federal regulations rather than another analysis with no guidance and only seeking a desired outcome.

Ignoring the Sandia analysis, the conclusion by the NRC, on the other hand, stated there would be no damage to safety related structures at Indian Point.

The State of New York has conducted a similar analysis with unidentified results.

In total, there have been at least nine analyses conducted of the gas line event with results ranging from no damage to Indian Point to complete engulfment of the site resulting in uncalculatable radioactive releases.

During my meeting with the NRC's Expert Evaluation Team I stated, (transcript available) that the gas line risk be evaluated complying with the federal regulations specified by 49 CFR 192.197 and 934, the Natural Gas Act of 2016 and include the existing 30" and 26" gas lines that are in the close proximity to Unit #3. This comment was ignored by the team.

The NRC's Expert Evaluation Team stated the team recommends, "that the NRC request that Entergy evaluate the impact of Enbridge's updated information."

In public communication between Entergy and the NRC on April 23, 2020 the NRC stated to Entergy, "NRC requests that you update your evaluation and supporting analyses as necessary and assess the validity and materiality of the assumptions made in support of your conclusions regarding the consequences of a postulated rupture of the 42-inch gas pipeline."²

Entergy responded on the same date, "Entergy is currently reviewing the validity and materiality of the assumptions made in previous analyses and will update or clarify the hazards analysis as appropriate. These reviews and associated updates or clarifications, if needed, are expected to be complete by June 30, 2020, and **will be available for NRC inspection at that time.**"

Given the NRC's history of accepting inaccurate information and incorrect analyses and its disregard for expert analyses that are counter to the NRC's preferred answer, (as evidenced by its disregard for the Sandia report) it is of great concern that the NRC will attempt to withhold or modify the Entergy 10 CFR 50.59 review. This is why it is necessary that you request the public release of the Entergy document prior to it being buried. This analysis should not contain and

² I assume this to mean a new analysis reviewed under the provisions of 10 CFR 50.59, consistent with the NRCs and Entergy's past practices.

security, proprietary or CEII information subject to withholding under 10 CFR 2.390.

Typically, it is understood within the NRC that, “**will be available for NRC inspection at that time**” means it will not be available to the public or to a FOIA request. NRC normal practice is to withhold documents from the public as confirmed by OIG-07-A-15 report September 6, 2007.³ In a general sense, I don’t disagree with this practice as it would not be practical for the NRC to retain all licensee documents. A vital document impacting the public, however, cannot be withheld. This analysis is vital to the safety of millions of residents.

I reiterate my request that you to write to the NRC Chairman Svinicki and demand the new analysis directed by the NRC Staff is made public and that any risk analysis of the Algonquin pipelines at Indian Point be conducted in accordance with PHMSA regulations and properly considers the Sandia analysis. The Entergy analysis, which is the first step “are expected” by June 30, 2020 as requested by the NRC Staff.

Thanking you in advance,



Paul M. Blanch
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West Hartford, CT 06117
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860-922-3119

Cc: NRC Chairman Svinicki
EDO Margaret Doane
Mr. David Skeen
Mr. Brian Haagensen

³ OIG found inconsistencies in the guidance provided to license renewal auditors with regard to removing copies of licensee- provided documents from audit sites. DLR management provides the audit teams with verbal guidance to never remove licensee documents obtained from the audit site. However, DLR's *Project Team Guidance* appears to permit some removal of licensee documents from an audit site, as indicated on page 26:

“The project team shall not take documents from an applicant’s site for in-office review, unless the documents are either already in ADAMS or the applicant agrees that the NRC can put the document in ADAMS.”

CHAIRMAN Resource

From: Paul <pdblanch@comcast.net>
Sent: Wednesday, May 06, 2020 12:29 PM
To: Sandra Galef; Keegan, Pat; David Buchwald; Peter Harckham
Cc: Paul M. Blanch; CHAIRMAN Resource; Doane, Margaret; Skeen, David; Haagensen, Brian; Raspa, Rossana
Subject: [External_Sender] Request you write a letter to NRC Chair
Attachments: Letter to electeds for risk assessment - AR edits.pdf

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