

ATTACHMENT 2



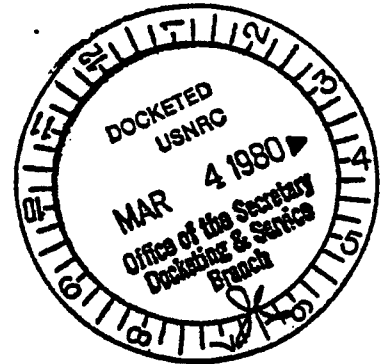
STANLEY FINK
SPEAKER

(1)

DOCKET NUMBER
PROD. & UTIL. FAC. ~~50-3-247-286~~ (S+D)

THE ASSEMBLY
STATE OF NEW YORK
ALBANY

February 27, 1980



Mr. John F. Ahearn, Chairman
Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Chairman Ahearn:

By notice dated February 13, 1980, the Commission solicited comment on the decision of the Director of Nuclear Reactor Regulation on the petition submitted by the Union of Concerned Scientists concerning Indian Point Units 1, 2, and 3. I offer the following comments with respect to the Director's decision.

The assured protection of public health and safety requires an expeditious determination of the questions raised by the UCS petition. Insofar as the Director's decision fails to address these serious questions, I find the denial of a request for a rule-making proceeding on Units 2 and 3 spurious and irresponsible.

I therefore strongly urge the Commission to convene a formal adjudicatory proceeding before a licensing board. Further, I concur with Commissioner Gilinsky that the import of this matter is so serious that the Commissioners themselves must serve as final arbiters in the decision.

The question of whether the plants may continue to operate during the resolution of this issue leaves me deeply distressed.

An elected official can have no greater concern than the health and safety of the citizenry. If there is reason to believe that Indian Point may pose an unacceptable risk, then prudence dictates that these plants be shut down pending a final determination.

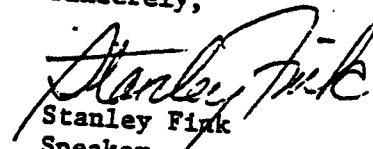
Yet the loss of electric power, should the plants be shut down, would cause economic hardship for the Metropolitan New York area, and exacerbate the region's dependency on imported oil for the generation of electricity.

It is apparent that the NRC, and its predecessor--AEC, may have gravely erred in the licensing of the Indian Point reactors and in concurring in the New York State Radiologic Emergency Plan. In the event that Indian Point Units 2 and 3 are shut down, either permanently or temporarily, I consider it the responsibility of the NRC to work with FERC and other relevant agencies to secure replacement non-oil fired power at comparable cost.

Chairman Ahearn
February 27, 1980
Page 2.

The public safety and economic well-being of the people of New York State rests to a large degree on your actions in regard to Indian Point. I urge the Commissioners to expeditiously resolve in a forthright manner this vitally important issue.

Sincerely,


Stanley Fink
Speaker,
New York State Assembly

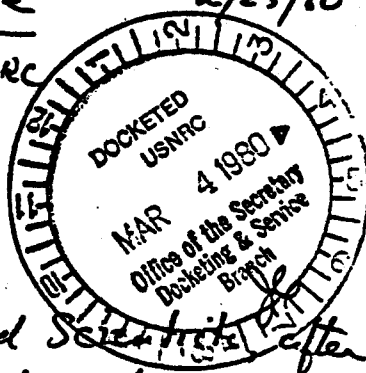
SF:mld

cc: Commissioner Peter Bradford
Commissioner Victor Galinsky
Commissioner Joseph Hendrie
Commissioner Richard Kennedy

Re: Federal Register - Call for
Public Response

2/23/80

Chairman John Ahearn, USNRC
1717 H. Street, N.W.
Washington DC 20555



Dear Mr. Ahearn:

The Union of Concerned Scientists, after careful examination, have found serious defects in the Indian Point Nuclear plants, only 30 miles or so from my home. I am worried, and angry over Harold Denton's high-handed decision not to close the plants now.

What should be done, as a minimum approach is 1. Set up an Atomic Safety and Licensing Board. 2. Compile a factual record of everything in the UCS petition. 3. This to be done through adjudicatory hearings which should be a means of setting up procedural safeguards.

The Commissioners, not the fact-gathering SLB, should decide - make the decision on the UCS petition. 4. Suspend operation of plants now until the Commissioners have made their final decision. 5. Hold hearings here I can attend - in the affected radius of the plants, which I consider to be between or up to 50 miles, probably 50, certainly 35 where (over)

balloons, released at the plants have landed -
in my area!

This should be done now. My family's health and perhaps our lives are at stake. Delay may mean increased numbers of cases of leukemia - which are already on the rise in my town - and an irreversible catastrophe if the NRC is even partly correct.

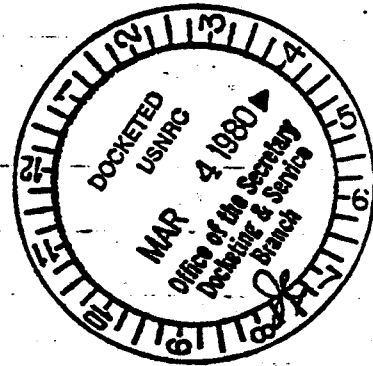
Urgently,

Mitzi S. Bowman
Checkerberry Lane
Sandy Hook, Ct. 06482

's. Although the governor of my state and the NRC appear to regard the Connecticut barrier as a lead impregnated barrier to radiation from Indian Point, I do not regard it!

February 10, 1980

Commissioner Ahearn
NRC
1717 "H" Street, N.W.
Washington, D.C. 20555



Sir:

(3)

I am appalled that Harold Denton has been allowed to recommend decisions against petition presented by the Union of Concerned Scientists regarding the continued operation of Indian Point plants #2 & #3.

It is only fair to the interests of the citizenry - not to mention safety issues - to hold adjudicatory hearings very soon within 50 miles of Indian Point - not in Maryland. We must deal with the issues raised by the Union of Concerned Scientists publicly. We must not allow the companies that operate the plants to decide on their safety. We need an objective licensing

board. I want to see an
atomic safety and licensing
Board grab out of formal
open hearings in order to
assess health, safety features,
evacuation planning, etc., etc.

At this point, the public
has no representation. We
cannot expect Con Edison to
protect us - it is interested in
profit & often chooses to
do what's best for business!

I sincerely hope to
hear of public meetings in
the Indian Point area very
soon. The Union of Concerned
Scientists must not be
brushed off!!

Phyllis Rodriguez
64 Elmwood
Croton Ny 10520

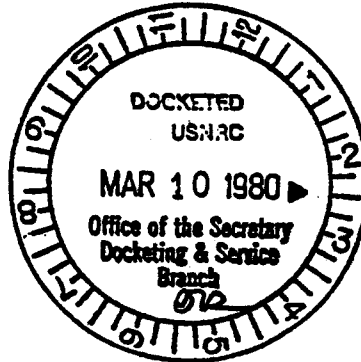
DOCKET NO. ER
PROD. & UTIL. FAC. 50-3, 247, 286 (52D)



FRIENDS OF THE EARTH 72 JANE STREET • NEW YORK, NEW YORK 10014 • (212) 675-5911

4

Mr. John Ahearne
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555



February 25, 1980

re: Federal Register docket numbers 50-3, 50-247, 50-286
Friends of the Earth -- Comments on petition by Union of Concerned Scientists and decision issued by Harold Denton re Indian Point

Despite the urgent petition submitted to the NRC by the Union of Concerned Scientists, Mr. Denton, the Office of Nuclear Reactor Regulation and the commission staff continue to ignore the substantive contents of the petition, the ongoing safety hazards at Indian Point plants 2 and 3, and the omnipresent threat presented by continued operation of these plants to over 20 million people in the metropolitan New York area.

By opting to permit continued operation of these plants pending safety reviews and retrofitting, Mr. Denton is taking a calculated risk on behalf of area residents, despite his public admission that the risk of these plants, due to their unsafe siting and population density, is not sustainable on a long-term basis.

There is no technical basis whatsoever for assuming that a catastrophic accident (class 9) of unpredictable nature and cause cannot or will not occur at Indian Point in the future, or during the period when the prescribed safety improvements will be carried out (nor is there any technical basis for assuming that such improvements will prevent such an accident or mitigate its consequences). This point should be stressed since the required upgrading is being done as a result of admitted technical and engineering inadequacies at both plants.

These changes are being done, by Denton's and the staff's own admission, to "compensate for" (Denton's and the staff's term) admittedly poor siting. The emergency response planning requirements being imposed by the NRC are also supposed to be compensation, but here again they are meaningless inasmuch as they completely ignore the impossibility of shielding or evacuating 20 million people, and, more importantly, do not require consideration of the consequences of a class 9 accident.

In effect, the NRC staff and Mr. Denton are using less stringent criteria to judge the acceptability of Indian Point than are used for other plants. If the NRC admits Indian Point is badly sited and that it would not be licensed in that site today, then those siting criteria should be applied not only to future plants but to operating ones since, clearly, operating plants are a great-

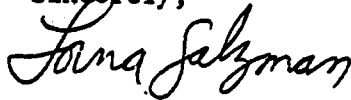
er risk than those not yet built. The NRC admits that future plants must meet stricter siting criteria; thus it is illogical and untenable to apply a double standard to operating plants since there is no technical basis to assume they cannot have catastrophic accidents.

The Indian Point plants present a unique threat to area residents and should not be permitted to operate until all safety problems have been eliminated, and until the question of siting criteria is settled in an equitable manner. Unfortunately, Mr. Denton's decision ignored these profound unresolved problems.

We believe that full public adjudicatory hearings are necessary in order to establish an accurate and full record regarding each item in the UCS position, preferably under a specially established Atomic Safety and Licensing Board, to be followed by full assumption of decision-making on the merits of the case by the commissioners themselves, not staff or the special board.

We believe Mr. Denton has done a disservice to the mandate of the NRC to assume full uncompromised protection of public health and safety by requesting cosmetic, superficial changes rather than substantive ones. We urge suspension of Indian Point I and II operation until our objectives have been met.

Sincerely,



Lorna Salzman
Mid-Atlantic Representative
Friends of the Earth

jc

(S+D)

ETHICAL CULTURE SOCIETY

2 West 64th Street

NYC NY 10023

E² Ethics and Energy

February 27, 1980

Mr. John Ahearne, Chairman
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Ahearne:

As members of a committee concerned with the ethical issues surrounding current and long-range energy policies, we strongly object to the manner in which the Union of Concerned Scientists' Petition on the Indian Point plants has been addressed by the Nuclear Regulatory Commission.

In particular, we take exception to the totally unresponsive actions taken by Harold Denton with regard to this Petition. Had the Commissioners themselves acted in response, clear accountability would have been established. We find it unethical in the light of events at Three Mile Island, and more recently at the Crystal River plant in Florida, that the commissioners should abdicate their responsibility for our public health and safety. The commissioners, not Mr. Denton, must finally be held accountable.

We urge that section 65 of the Petition, calling for the establishment of an Atomic Safety and Licensing Board, be effected immediately. This Board should conduct hearings and compile a factual record on Indian Point. Final decisions regarding recommendations should be made by the commissioners themselves, and while these decisions are being made, operation of the Indian Point plants should be suspended.

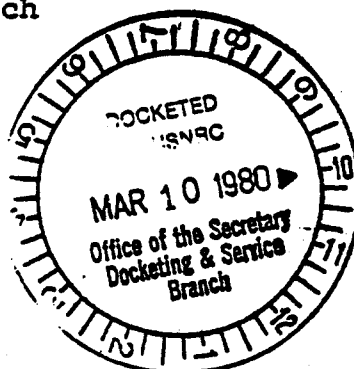
We look forward to hearing from you at your earliest convenience and that you will give full and immediate consideration to this matter of vital concern to the people of the greater metropolitan area.

CC: Senator Patrick Moynihan
Governor Hugh Carey
Congressman Theodore Weiss
Mayor Edward Koch

Yours truly,

Lawrence Plotkin

Lawrence Plotkin, Co-Chairman
E² Ethics and Energy Committee





CITY OF NEW YORK

COMMUNITY BOARD NO. 4

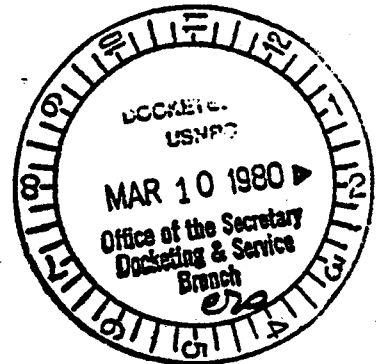
326 WEST 42ND STREET • NEW YORK, N.Y. 10036
TEL. 736-4536

CKET NUMBER 50-3,247,280
PROP. & UTIL. FAC
34D

CAMILLE TRUCHEL
CHAIRPERSON

NORMAN M. DION
DISTRICT MANAGER

February 29, 1980



U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sirs:

At its meeting, held on February 6, 1980, Manhattan Community Board No. 4 approved the following resolution:

"WHEREAS, the accident at Three Mile Island has made New York citizens aware of the dangers of nuclear power to present and all future generations; and

WHEREAS, the nuclear power stations at Indian Point are in the midst of the largest concentration of population in the United States for which no acceptable plan of evacuation has been established, nor one possible; and

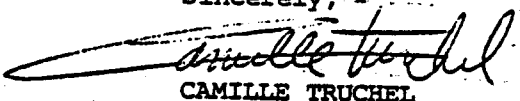
WHEREAS, these plants do not meet even the pre-Three Mile Island standards of the Nuclear Regulatory Commission, have been repeatedly cited for safety violations, and could not be licensed if they were applying today; and

WHEREAS, the Indian Point nuclear reactors are located near the Ramapo fault and cannot withstand an earthquake more severe than five on the Richter scale, and are also vulnerable to tornadoes and sabotage; and

WHEREAS, a primary concern of Community Board No. 4, Manhattan is the health, safety and well being of its district residents;

THEREFORE BE IT RESOLVED, that Manhattan Community Board No. 4 urges the Nuclear Regulatory Commission to act favorably, and with all due speed, upon the Union of Concerned Scientists' petition for decommissioning Indian Point Unit 1 and suspension of operation at Units 2 and 3 pending their being brought up to current safety standards and pending review of the suitability of their site for any nuclear power generators; which petition has been supported by the Attorney General of the State of New York, Robert Abrams, in a formal statement to the Nuclear Regulatory Commission."

Sincerely,


CAMILLE TRUCHEL
Chairperson

CT/md

Page 2

U.S. Nuclear Regulatory Commission

c.c.: John Ahearne, Chairman
Joseph M. Hendrie, Commissioner
Victor Gilinsky, Commissioner
Richard T. Kennedy, Commissioner
Peter A. Bradford, Commissioner
Antonio Olivieri, City Councilman
Henry J. Stern, City Councilman
Carol Greitzer, City Councilwoman
Ruth Messinger, City Councilwoman
Joan Holt, NYPIRG

NEW YORK STATE BUILDING AND CONSTRUCTION TRADES COUNCIL



AFFILIATED WITH BUILDING AND CONSTRUCTION TRADES DEPARTMENT AFL-CIO

211 East 43rd St., New York, N.Y. 10017 • Phone 212/682-7184

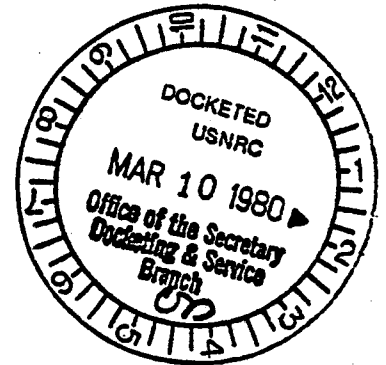
DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,247,286

(S+D)

7

March 7, 1980

Commissioner Richard Kennedy
Nuclear Regulatory Commission
1717 H. Street, N.W.
Washington, D.C. 20555



Dear Commissioner Kennedy:

The members of the Building and Construction Trades Council represent over 200,000 New York workers. With that clear responsibility in mind, it has supported the operation of the Indian Point nuclear power plant. Thus, Mr. Denton's decision to approve continuing operation was welcomed. It showed that the Nuclear Regulatory Commission had listened to the clear economic interests of New Yorkers and also judged the case on its merits.

That a group of unelected and unappointed out-of-state activists like the Union of Concerned Scientists were able to threaten our local economic livelihood really worried us here at the Council. That the NRC now is considering further review after Mr. Denton's decision and holding more hearings worries us even more.

We support the decision to approve the operation of the Indian Point generating plant. We hope you and your fellow commissioners will hear the concerned voice of New York workers, as well as the qualified scientific voices of groups like Scientists and Engineers for Secure Energy, SE₂, with its noble prize-studded membership and affirm Harold Denton's decision without more and more hearings. Even with Indian Point, New Yorkers will be severely hit by rising foreign oil prices affecting electric costs; but without it the cost will be much more. And its impact will be heaviest on the poor, elderly and working families of our area who are just now "squeezing by."

Sincerely,

Edward J. Cleary
Edward J. Cleary
Secretary-Treasurer

EJC:ce

COMMENT ON NRC STAFF DECISIONS RE THE UCS PETITION & INDIAN POINT

Mr. John Ahearne, Chairperson
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,247,286
54D

March 5, 1980

We are a group of citizens who have been meeting for the last year to discuss energy-related issues. We have studied the decision of Harold Denton regarding the UCS petition on Indian Point and we find it to be unsatisfactory. We are not qualified to challenge all the technical points under debate, but feel that his dismissal of the UCS contentions and his advocacy of certain short-term "improvements", leave us in as great a danger as before. We have no confidence that the Office of Nuclear Reactor Regulation under Dr. Denton has the interests of public health and safety foremost in its mind. We demand that you the commissioners order further public adjudicatory hearings and decide yourselves on the merits of each point in the UCS petition.

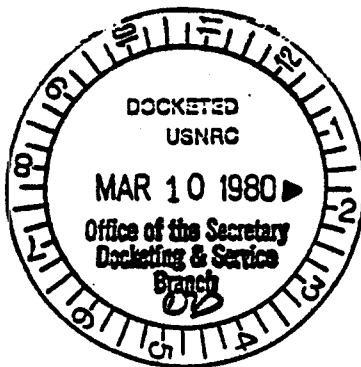
To this end, we strongly urge you to follow the recommendations of the UCS to establish immediately an Atomic Safety and Licensing Board to supervise this procedure, and that you take the responsibility for the final decision.

We also feel that if you are to fulfill your charter and properly protect the public's health and safety, you must shut down Indian Point plants #2 and #3 until all these issues are fully resolved.

(8)

Sincerely Yours,

THE NEW YORK STUDY GROUP ON ENERGY



Jeanne Hutchins
John Miphetta
Jim Lall
William P. Bernard
Ray Folski
Jim C. Sehn
Sharon Lanzon
George R. Blum
Gilberto Sitran

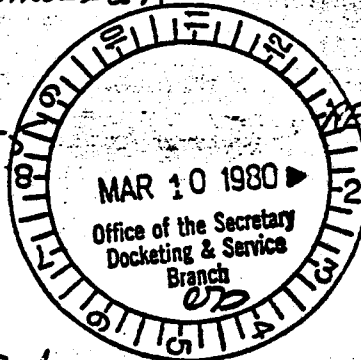
NYSGE/ c/o Miglietta/ 123 Fulton St.
New York City 10038

ZENITH DESIGN

New Preston, Connecticut 06777 (203) 868-2569

Feb 26, 1980

Chairman John Ahearn
Nuclear Regulatory Commission
1717 H Street NW
Washington, D.C. 20555



Federal Register
Request for Public
Response to Petition
by UCS to Shut Down
Indian Point.

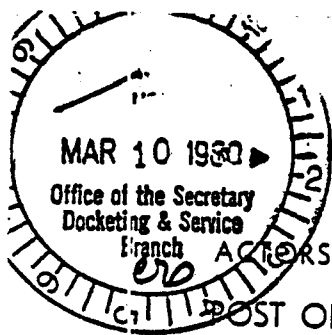
Dear Mr. Ahearn:

Please reject Harold Denton's
decision not to shut down Indian Point.
Ask that an Atomic Safety and Licensing Board
be set up, and that a factual record be
compiled by this Board on the items in
the Union of Concerned Scientists' (UCS)
petition. Do this through adjudicatory hearings
which can become the means of providing
procedural safeguards. Also ask that the
Commissioners make the decision on the UCS
petition, not the licensing board. The
Licensing Board should only be for fact
gathering. I support a suspension of plant

operations until the Commissioners have made their final decision. ~~the~~ I want hearings to be held in the affected radius of the Indian Point plant so that I can attend the hearings. This course must be taken with all speed. I live within 50 miles of Indian Point, as do my two children and my parents. Every day that Indian Point remain in operation I fear for their safety and health, and therefore am morally bound to seek a full, factual, public hearing.

Thank you for your attention to this matter. With all hope we can together stop this catastrophe waiting to happen, I remain

Yours-Truly.
Nora James Percival
NORA JAMES PERCIVAL



TICKET NUMBER
JO & UTIL. FAC 50-3.247.286
S+D

ACTSANE

ACTORS' COALITION TOWARD SAFE ALTERNATIVES TO NUCLEAR ENERGY
POST OFFICE BOX 404 PLANETARIUM STATION NEW YORK, N. Y. 10024

United States Nuclear Regulatory Commission
Washington, D.C. 20555
John Ahearne, Acting Chairman
Peter Bradford, Commissioner
Victor Gilinsky, Commissioner
Joseph Hendrie, Commissioner
Richard Kennedy, Commissioner

Feb. 25, 1980.

(10)

Dear Commissioners,

I understand that you are soliciting comments on Harold Denton's recommendations on short term actions as regard Indian Point. Once again I must protest your obviously insincere efforts to solicit public response through the use of something as realistically inaccessible to the Public as the Federal Register. However, this is the least of the things that I wish to protest in this particular letter.

The Union of Concerned Scientists is a highly qualified and dedicated group of experts in their varying fields. I have followed their activities, and yours, in regard to the Indian Point nuclear reactor very closely. I am shocked and appalled that you have demonstrated such little respect for their findings and their efforts to bring about a thorough review of the safety (and terrifying LACK of safety) of a plant situated so dangerously close to such a vast number of people. The actual content of the petition was virtually ignored by you. You will not be acting responsibly unless you review each and every point in the petition yourselves, and not simply by reviewing the findings of your staff members in regard to such an important issue.

The UCS requests the immediate establishment of an Atomic Safety and Licensing Board to conduct (true) Public hearings and compile factual records on all items requested in the petition. This would be a very healthy step that might help to restore some of the total lack of confidence that many of us in the American Public feel towards the Nuclear Regulatory Commission, based on your lack of respect for the American Public and our opinions.

I have already written to my Congressmen and suggested that the NRC be abolished altogether. And I will continue to exert this pressure on my elected officials, and work towards convincing more and more people to do the same through my own work in communications through the Arts, until you can convince me, through your actions, that you really have the best interests of the American Public, not American Big Business interests, in mind.

Indian Point should by NO MEANS be allowed to remain open until ALL questions of safety are COMPLETELY resolved. I am speaking for myself and all the members of ACTSANE.

Sincerely,

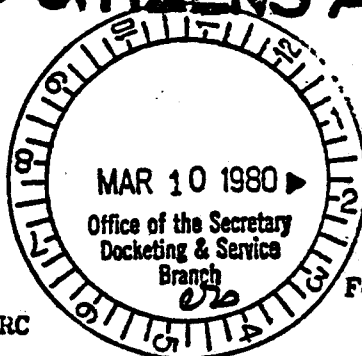
Eva Marmorstein
—Eva Marmorstein
—Founding Member
—ACTSANE

DUPLICATE NUMBER
FRO UTIL FAC 50-3,247,286
54D



50 St. John Place
New Canaan, Conn. 06840

UNITED CITIZENS AGAINST NUKES



February 25, 1980

Chairman John Ahearn, USNRC
1717 H Street
Washington, D.C. 20555

In response to the Federal Register's request for public response to the petition of the Union of Concerned Scientists (UCS) which asks for a shutdown of the Indian Point Nuclear Reactors;

1. Please reject Harold Denton's decision not to shut down.
2. We are asking that an Atomic Safety and Licensing Board be set up to compile a factual record based on the items in the UCS petition.
3. We would like this done through adjudicatory hearings, these hearings to become the basis for providing procedural safeguards.
4. But we ask that the NRC commissioners make the final decision on the UCS petition points, not the licensing board, which should only be for fact gathering.
5. We want a suspension of operation of the Indian Point facility until the commissioners have made their final decision.
6. Please hold hearings in the affected radius of the plant so we can be there!
7. We beg you to get to this with all speed. In the light of what Dr. Sternglass has observed from the Three Mile Island accident we are edgy about the consequences of even the operation of the Indian Point facility. It is an old and "rickety" nuke!

I am writing this for our anti-nuke group of lower Fairfield County who have empowered me to speak for them.

Sincerely,

Louie F. Besson
Mrs. John C. Besson

FIGHT BACK

TICKET NUMBER
DO & UTIL. FAC. 50-3, 247, 286
3+D

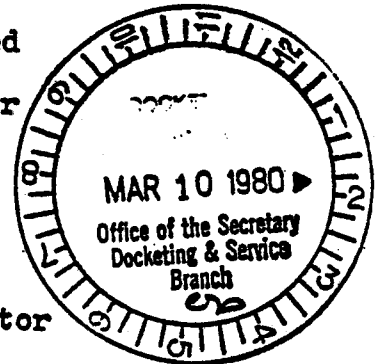
1 East 125 St. / New York, N.Y. 10035 / 831-6561

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JAMES HAUGHTON
Director
JOSEPH CARNEGIE
Asst. Director

Statement On Harold Denton's Indian Point
Decisions and the Union of Concerned
Scientist Petition (Federal Register
Docket Nos. 50-3, 50-247, 50-286)



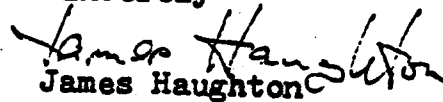
Harold Denton, Director of Nuclear Reactor Regulation, in early February, rendered decisions dealing with Indian Point. His decisions failed to deal with the most important risks raised by the petition of the Union of Concerned Scientists. The decision to permit on going operation of Indian Point plants gives no protection to the people in the area should there be a major accident. All safety deficiencies must be corrected and a thorough site - suitability review should be made.

The UCS petition was obviously ignored by the Director and it is clearly the responsibility of the Commissioners to decide on each point in the petition. The procedures requested by UCS in section 65 of the petition should be accepted by the Commissioners. It is absolutely necessary that there be an Atomic Safety and Licensing Board to carry out public hearings and put together a factual record on all matters requested

by UCS. When this has been done, the Commissioners must take on all decision - making responsibility, and not leave the UCS petition to be decided by staff or the ASLB.

On behalf of my organization, I strongly urge the immediate suspension of operations at the Indian Point plants until such time that all the issues advanced by UCS have been properly adjudicated and decided.

Sincerely


James Haughton

DOCKET NUMBER 50-3, 17,286
PROC. & UTIL. FAC. 34D

Friends of The Hudson

CHAIRMAN
Larry Bogart

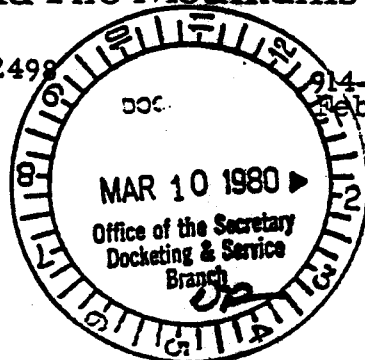
SECRETARY
Joy MacNulty



Protect The River and The Mountains

P.O. Box 619 WOODSTOCK, N. Y. 12498

Chairman Ahearne
US NRC
1717 "H" St. NW
Washington, DC 200__



914-679-7746
Feb. 25

Dear Commissioner:

We urge you in the strongest possible terms to investigate in depth the claims of the Union of Concerned Scientists that the operation of Indian Point #2 and #3 reactors is highly dangerous and constitutes a threat to the 30,000,000 people in the planning area.

It is apparent to us that even a moderate accident would overwhelm our communities in Ulster and Greene counties, which are designated evacuation centers in the event of a federal disaster, and in any case are favored places of refuge for harried metropolitans. All of our supply systems are dependent upon the city. No funds are available for sheltering large populations here, just outside of the 50-mile Emergency Planning Zone. Rather than think of us here as having "no standing", please realize that we are also vulnerable.

We further urge that the hearing be held in the area, and that all Commissioners be present. Until the safety of these reactors has been demonstrated, we ask that you follow the suggestions of the Kemeny and Rogovin groups of inquiry and close the reactors. Otherwise, we respectfully ask that you resign and give the authority to those who have the will to exercise it.

Yours sincerely,
J.J. MacNulty, Secy.
The Rev. Godwin

J.J. MacNulty, Secy.
& Rev. Godwin

TONY MCVEITY, CONN. CHAIRMAN
ROBERT F. DRINAN, MASS.
FLOYD J. FITHIAN, IND.
ANDREW M. MAQUIRE, N.J.
PETER H. ROSTMAYER, PA.
MIKE SYNAL, ILL.

PAUL H. McCLOSKEY, JR., CALIF.
ARLAN STANGORAND, MARYL.
JIM DEAN, IND.

MAJORITY LEADER
MINORITY LEADER

NINETY-SIXTH CONGRESS

Congress of the United States

House of Representatives

ENVIRONMENT, ENERGY, AND NATURAL RESOURCES
SUBCOMMITTEE

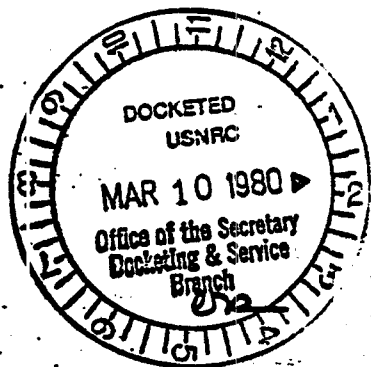
OF THE

COMMITTEE ON GOVERNMENT OPERATIONS

RAYBURN HOUSE OFFICE BUILDING, ROOM B-371-B-C

WASHINGTON, D.C. 20515

DOCKET NUMBER 50-3,247,286
PROD. & UTIL. FAC. S & D



February 28, 1980

14

Honorable John Ahearne
Chairman
Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket Nos. 50-3
50-247
50-286

Dear Chairman Ahearne:

The Nuclear Regulatory Commission should swiftly reconsider its decision to permit renewed power generation at the Indian Point site 30 miles from New York City. That site, of all the operating nuclear power plant sites today, represents the clearest danger to a massive population in the event of a major accident or radiation leakage.

The Commission, by a number of actions and statements made since the Three Mile Island accident nearly a year ago, has endeavored to convey to the public and to the Congress its heightened concern over the question of siting policy. This action dramatically undercuts any assertion by the Commission of a commitment to a safer approach to nuclear power plant siting.

Moreover, the Commission's rather peculiar procedure does little to inspire confidence in its underlying decision. In essence, what the Commission has done is to condone continued nuclear power generation at Indian Point while conceding that it has not yet made up its mind on the merits of fears about the inherent safety of the site. That middling posture does not reassure the citizens within the reach of an accident at the site or citizens around the Nation who look to the NRC to put safety first in their regulation of the nuclear power industry.

I would make several more precise recommendations to the Commission regarding its action on the petition of the Union of Concerned Scientists to stop power generation at Indian Point. In conjunction with its February 6 decision approving a partial denial and a partial grant of the UCS petition, the NRC specifically invited public comment on several options it might exercise in further action on that petition and on Indian Point. I refer to these options in these recommendations.

3/3...To OGC to Prepare Reply for Signature of Chairman...Date due: Mar 10.
Cpys to: Chm, Cmrs, Docket, EDO, RF...80-0405

Honorable John Ahearne
February 28, 1980
Page Two

I strongly urge the Commission to employ Option 5, that of conducting a further informal proceeding on the Indian Point site question. By the same token, I strongly oppose Options 3 and 4, both of which have the characteristic of increasing the formality, and doubtless the duration, of the Commission's additional deliberations.

To be quite blunt, one of the Commission's obvious difficulties is that it has considerable difficulty making decisions. There is a persistent tendency to enmesh all problems in an excess of process which makes the final decision so remote from its initial presentation that the appropriate sense of urgency is lost -- and indeed, in the worst of cases, a dangerous condition is allowed to fester and perhaps results in harm while the bureaucratic mechanism of the agency lumbers on.

Options 3 and 4 almost certainly would conform to that unfortunate pattern. I urge the Commission to move swiftly, to convene additional hearings, both here in Washington and near the Indian Point site, to plumb public sentiment and to evaluate alternative power generation possibilities for the region supplied by Indian Point.

Hearings near the site itself were discussed at the Commission's open meeting in Washington on the UCS petition. It is my belief that such local hearings are necessary to ensure the completeness of the NRC's understanding of the Indian Point question. Meetings in Washington are insulated from the intensity and breadth of feeling among those citizens most directly affected by the decision. Working people there have neither the time nor money to come to Washington. Nothing could more vividly illustrate the public grievance against Washington than the specter of this decision being made by regulators who have not deigned to go directly to and talk with the individuals most strongly affected. The Commission should also bear in mind the lesson of Three Mile Island regarding the real psychic stress, physical dislocation and cost visited upon citizens caught near a nuclear plant in crisis. The citizens around Indian Point deserve to be heard before -- not after -- the fact.

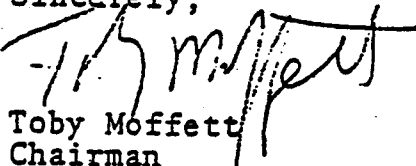
While a Congressional body such as the Subcommittee on Environment, Energy and Natural Resources, which I chair, could conduct such hearings to give those citizens the forum they deserve, the decision about Indian Point ultimately must be made by the NRC. Therefore it is the NRC, not any other group, that has the responsibility to listen to the public's voice before making that decision.

Honorable John Ahearne
February 28, 1980
Page Three

.Lastly, I urge the Commission to place a rigid deadline on itself for a final decision on the safety of Indian Point as a nuclear site. If the NRC truly assigns this decision the priority it deserves, a quite limited time span will be adequate, especially in light of the massive amount of information already at the Commission's disposal in making its decision. I refer in particular to the work last year of my Subcommittee on emergency planning and evacuation around nuclear plants, and to the host of recommendations on siting policy that have emerged from the studies of the Three-Mile Island accident. Only a rapid, clearly foreseeable end to this controversy can begin to put the minds of affected citizens to rest.

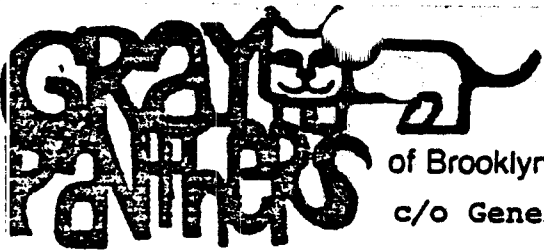
Toward that end, I call upon the Nuclear Regulatory Commission to act, within the next three weeks, to set a final deadline for the decision regarding Indian Point. The NRC should publicly commit itself, no later than March 20, to a firm deadline for resolution of the Indian Point site question.

Sincerely,


Toby Moffett
Chairman

TM:bhc

cc: Commissioner Victor Gilinsky
Commissioner Joseph M. Hendrie
Commissioner Peter A. Bradford
Commissioner Richard T. Kennedy



DOCKET MSER 50-3,247,286
PROD. & UTIL. FAC. STD

c/o Generations 55 Flatbush Avenue, Bklyn NY 11217

Mr. John Ahearne, Chairman
US Nuclear Regulatory Commission
Washington, DC 20555

15

Dear Mr. Ahearne:

This is a comment on Harold Denton's Decision re Indian Point and the UCS Petition (Federal Register #s 50-3, 50-247, 50-286)

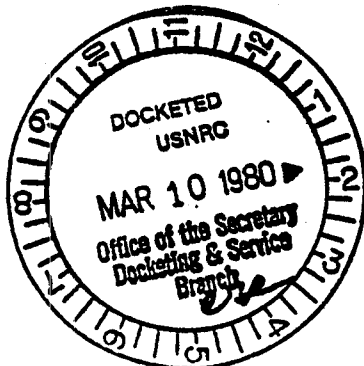
The Gray Panthers of Brooklyn, a multi-generational group working on community issues in Brooklyn, takes strong issue with Mr. Denton's Decision on the Union of Concerned Scientists petition.

While we are pleased that the NRC and Con Edison are now proposing to decommission Indian Point #1, we feel a grave danger from the #2 and 3 plants on that site. The UCS, in petitioning the NRC, recognized the extreme danger to millions of people represented by these plants. Mr. Denton's decision doesn't even pay serious attention to many of the most important points of the petition.

We appeal to each and every Commissioner to look into this matter, following the procedures requested by the UCS in Section 65 of its petition, which would have an Atomic Safety and Licensing Board conduct adjudication hearings and compile a record of the facts of Indian Point. While this is being conducted, the Commission has a moral obligation to suspend the operating licenses of the two plants. The consequences to the United States--and to the entire nuclear program--in the event of an accident at Indian Point would be tantamount to genocide.

Sincerely,

Shel Horowitz



GRAY PANTHERS



AGE AND YOUTH IN ACTION

DOCKET NUMBER
PROC. & UTIL. FAC. 50-3,247,286
15 West 65th Street, New York, N.Y. 10023 Tel: (212) 799-7572

Feb. 26, 1980

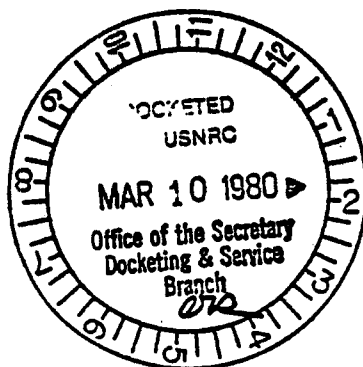
Mr. John Ahearne, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

(16)

Dear Sir--

We Gray Panthers of New York protest the recent decision in February of Harold Denton, Director of Nuclear Reactor Regulation, with respect to Indian Point. His decisions are unacceptable because they do not result in the elimination of the major hazards at Indian Point raised by the Union of Concerned Scientists' petition. We are still unprotected from a major accident at Indian Point. These plants should not be permitted to operate until all safety deficiencies have been eliminated and until an adequate site-suitability review has been conducted.

We feel that an Atomic Safety and Licensing Board should be established to conduct adjudication hearings and to compile a factual record re: Indian Point. Further all operation at Indian Point should be shut down until safety measures are carried out.



Sincerely yours,

Stella Murphy

Stella Murphy-Co-Covener

JONATHAN B. BINGHAM
229 DISTRICT, NEW YORK

COMMITTEES:

FOREIGN AFFAIRS

(CHAIRMAN, SUBCOMMITTEE ON ECONOMIC
POLICY AND TRADE

INTERIOR AND INSULAR AFFAIRS

NORTHEAST-MIDWEST
CONGRESSIONAL COALITION
STEERING COMMITTEE

"HELSINKI" COMMISSION ON
SECURITY AND COOPERATION
IN EUROPE

Congress of the United States
House of Representatives
Washington, D.C. 20515

March 6, 1980

DOCKET NUMBER
PROD. & UTIL. FAC. 58-3,247,286

John F. Ahearne
Chairman
Nuclear Regulatory Commission
1717 H Street N.W.
Washington, D.C. 20555

Dear Chairman Ahearne:

On November 14th I wrote to Chairman Hendrie urging that the Nuclear Regulatory Commission rule directly on the Union of Concerned Scientists petition seeking the shut-down of the Indian Point reactors. I specifically asked that the NRC examine the potential impact of a worst-case accident near a major city and possibilities for a major evacuation. I said that "if a workable evacuation plan cannot be devised for Indian Point, then the NRC will have no choice but to shut the plant down."

I must say that I am far from satisfied with the manner in which the NRC handled the UCS petition. The petition was relegated to staff for consideration with the Commissioners only becoming involved near the end of the process. It is clear that the staff worked with the utility to negotiate an agreement for some minor improvements with little or no consideration given to the pros and cons of shutting down the plant entirely. Public involvement was limited to a single public meeting where critics were invited to speak before being apprised of the staff's already agreed upon improvements. The New York Times called the proceeding a "kangaroo conference" and noted that "there was no sign at any point that the possibility of a complete shut-down had been given the serious attention it deserves." I do not believe that the NRC gave the UCS and other Indian Point critics the fair hearing they are entitled to.

Accordingly, I am urging the NRC to impanel an Atomic Safety and Licensing Board to conduct an adjudicatory hearing on the question of closing Indian Point. The Commissioners will then be able to assemble factual data—from all sides—which will allow them to decide if Indian Point endangers the millions of people who live within 50 miles of the plants. If it does, I repeat, the NRC will then have no choice but to order the shut down of the facility. In any case, the public and the Congress must know that questions of the safety and viability of this facility has been given full and impartial consideration.

Sincerely,

Jonathan Bingham

JBB:mrđ

WASHINGTON OFFICE:
2252 RAYBURN HOUSE OFFICE BUILDING
TELEPHONE: (202) 225-4411

GORDON E. KERR
ADMINISTRATIVE ASSISTANT

DISTRICT OFFICES:
2488 GRAND CONCOURSE
BROOKLYN, NEW YORK 10458
(212) 933-2310
RUTH K. NEZIN
DISTRICT REPRESENTATIVE

684 BRITTON STREET
BROOKLYN, NEW YORK 10467
(212) 633-7500
LUCILLE SUBBONDO
DISTRICT REPRESENTATIVE

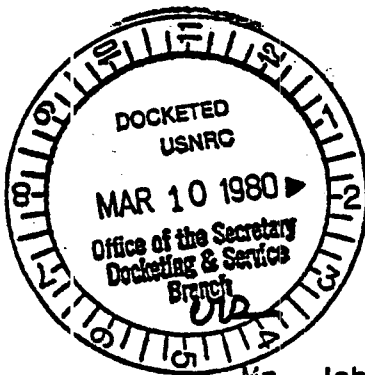




CKET NUMBER 50-3,247,286
D. & UTIL. FAC.
S+D

STEERING COMMITTEE
PARKS, RECREATION and OPEN SPACE
PEEKSKILL, NEW YORK

(18)



February 29, 1980

Mr. John F. Ahearne, Chairman
U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555

Dear Mr. Ahearne:

The Steering Committee for Parks, Recreation and Open Space requests public hearings on the merits of the Union of Concerned Scientist's petition calling for the shut down of Indian Point Units 2 and 3.

Pending completion of the hearing and detailed consideration of all aspects of the petition, Units 2 and 3 should be shut down.

Very truly yours,

STEERING COMMITTEE

Phyllis Sakalian

(Mrs.) Phyllis Sakalian,
Corresponding Secretary
1464 Summit Ave.
Peekskill, N. Y. 10566



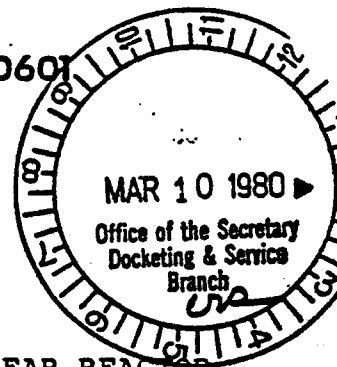
wespa

DOCKET NUMBER 50-3,247,286
PROD. & UTIL. FAC. S&D

Westchester Peoples Action Coalition, Inc.
255 Grove Street
White Plains, New York 10601
914/682-0488

March 6, 1980

1a



PUBLIC COMMENT ON THE RECOMMENDATION OF DIRECTOR OF NUCLEAR REACTOR REGULATION HAROLD DENTON RELATING TO THE 2.206 PETITION OF THE UNION OF CONCERNED SCIENTISTS ON INDIAN POINT (Docket numbers 50-3, 50-247, and 50-286).

Comment by WESPAC (Westchester Peoples Action Coalition, Inc.) and the SHAD (Sound-Hudson Against Atomic Development) Alliance.

Submitted by Charles Scheiner.

WESPAC and the SHAD Alliance are community-based, grass-roots organizations in the Westchester/Putnam area, which includes Indian Point. Two of our active members, Connie Hogarth and myself, have participated extensively in the process preceding the decision on the Union of Concerned Scientists (UCS) petition. We came, at our own time and expense, to Washington twice, first to meet with NRR Director Harold Denton, and later to testify before the Nuclear Regulatory Commissioners themselves. Our views on the issues included in the UCS petition, and our support for the petition itself, have been expressed to the NRC over and over again.

At this point, we will reiterate our position. In addition, however, we find it necessary to discuss the process by which the decision on the UCS petition has been reached, as well as on the responsibility of the NRC in making that decision. It is disingenuous and hypocritical for the NRC to ask for "public comment" at this time, after having permitted the reactors to resume operation and having allowed the Director's order to take effect.

The NRC consideration of the UCS petition was, in the words of the attached New York Times editorial, a "kangaroo conference."

Not only were the substantive investigations and conclusions delegated to people with vested interests (the utilities and the NRC staff), but the entire process contained no opportunity for outside input. Even the format of the February 6 NRC meeting, with UCS and citizens preceding Mr. Denton's presentation of his agreement with the utilities, prevented any objective or balanced discussion of the recommendations. The fraud appears to be continuing.

The NRC will only be able to begin to re-establish its credibility if the entire issue is reopened and handled as it should have been in the first place. It must be considered by the Commissioners themselves (or, as Commissioner Gilinsky has suggested, by an Atomic Safety and Licensing Board with review by the Commissioners). This process should cover the range of issues cited in the UCS petition, as well as other issues relevant to the safety of the people in the vicinity of Indian Point. The Board must have adjudicatory powers, and must be open to evidence not only from the UCS and the utilities, but also from area residents, state and local governments, and others, as suggested by Commissioner Bradford. In order to facilitate this open flow of information, the majority of the proceedings should be held in Westchester County or New York City, near Indian Point.

In addition to the issues already under discussion, the proceeding must consider, as both Commissioners Bradford and Gilinsky have written, the "benefits" to the area from the continued operation of Indian Point. The attached New York Times article gives a glimpse of the excess capacity in New York, and at the dispensibleness of Indian Point. While it is not the job of the Nuclear Regulatory Commission to make a formal decision on a risk/benefit tradeoff, it is hard to see how that is avoidable in cases such as this. In any case, a thorough investigation and airing of these issues will aid the utilities and federal, state, and local officials in making determinations of their actions

relating to Indian Point.

Although the viability of the plant for long-term operation has been called into question by Commissioner Bradford and Director Denton, as well as many others (and must be an issue considered by the ASLB and Commissioners), the short-term acceptability of continued operation must be dealt with now, in advance of the thorough, detailed investigation and adjudication. The Commission must decide as expeditiously as possible whether the plants should be allowed to continue to operate while the more extensive issues are being explored. Our position, which we have stated before, is simple: There is no justification for allowing the Indian Point plant to operate in its current potentially calamitous condition for one more day. Its licenses should be suspended immediately, and not reinstated until the investigation is complete, the Commissioners have reviewed the evidence and made their decisions, and those decisions have been implemented. To do otherwise is to risk unimaginable disaster.

In addition to considering technical problems relating to accident probability, the Commissioners must also consider human responses to an accident or a perceived or rumored accident. We have discussed this with you in the past -- suffice it to say that a workable, proven, and tested evacuation plan would only go half way toward relieving public concern. The costs of plant operation in anxiety and hypertension, the potential panic caused by every minor mishap (or rumor of mishap -- or deliberate threat of accident -- or minor natural incident), and the real risk of a stampede in the event that a limited evacuation was necessary (or perceived as necessary by a sizable number of people) must be considered too.

In the last few months you had a reportable occurrence at Indian Point (PNS-I-79-06) of a bomb threat, and you had a small earthquake with public concern beyond your own seismologists' comprehension. How much more will it take before you deal with human realities? The federal government, of which the NRC is a

part, is elected by people, not machines or utilities. We hope that you will keep that in mind.

So far, NRC action on this petition has not been reassuring. Several issues in the Director's thought process and in his decision itself cry out for correction.

On January 22, eight New York area citizens met with Harold Denton for 3½ hours, discussing issues related to the UCS petition in particular and Indian Point in general. Your Director was courteous, but he flatly refused to consider the possibility that Indian Point might be dangerous enough that its closing, even for a short time, could be desirable. He stated that "The day before the UCS petition came in I thought the plant was safe to operate or I would have acted before the UCS petition came in. ... I don't think the risks at Indian Point are all that unreasonable or I would have acted yesterday."

The petition specifically asked for consideration by the Commissioners, and not by the staff. Despite this, and despite the staff's admitted prejudice and bias toward its previous decisions (or lack thereof), the matter was referred to the Director, and worked out by him with the utilities involved. With such a lack of objectivity, the Times "kangaroo conference" epithet applies not only to the February 6-7 meeting, but to the entire process. If there is to be a fair determination on the issues raised by UCS, it has not yet begun.

In spite of his "I would have acted yesterday" position, Mr. Denton found it advisable to require a whole laundry list of (mostly inconsequential) short-term and long-term measures to bring Indian Point up to "average" in societal risk. Given that position, was he not derelict in failing to act before the UCS petition and subsequent public outcries? Or are the measures a cover-up, a public relations ploy (see attached Times article) to save the utilities' faces by permitting them to propose the modifications, in advance of the release of the decision, as voluntary changes which will make Indian Point the safest in the country? Either way, it's a sad commentary on the seriousness and competence of the NRC staff to protect public safety.

If only the squeaky wheel gets the grease (or the paint to obscure that the entire bearing is shot), what protection is there for neighbors of plants in areas less populated or more distant from Washington than Indian Point? What happens if a citizens' group like the Union of Concerned Scientists doesn't happen to focus on a particular facility? What indication is there that those people would be safe? Are they less important than us, "fortunate" to be adjacent to a plant with a lot of public attention?

In his briefing to the Commissioners, Mr. Denton stated that his recommendation would upgrade Indian Point to "average" in societal risk, counterbalancing the ten times greater consequences from population density and poor evacuation conditions with a ten times projected reduction in accident probability or effect. While it is unclear that the proposed modifications do indeed provide an improvement of a factor of ten, we'll postulate that for the sake of the following argument. It then appears that minor changes in staffing and operations, with no technological advances, little effort, and very slight financial costs, can greatly improve reactor safety. If this is so, what possible justification could there be for not making these changes long ago? And furthermore, why not make them on every single plant in the Nation? The entire national risk from nuclear power would then be decreased tenfold, a laudable objective.

After doing this, however, Indian Point will again become ten times more dangerous than the "average plant" because of its demographics. Public outrage will again result in cosmetic changes which, we will be assured, will decrease the risk ten-fold to bring it back to par. The vicious circle is clear, then ... after a few iterations the risk to America from nuclear power will be truly negligible. We will be back where we were a year ago, before March 28, 1979.

Harold Denton would like to unlearn the lessons of Three Mile Island. So far, however, he has not. As he told us on January 22, "TMI had a profound effect on the division, the organization, and all members of the staff. We have realized that an accident can happen. Before TMI we sort of felt that accidents really could not happen and therefore didn't take the sort of emergency precautions and take all the extraordinary actions I think we should."

How quickly you forget.

We have other reasons to question the credibility of the Nuclear Regulatory Commission and its staff. At our meeting, Mr. Denton (and Project Manager Lenny Olshan) assured us that Indian Point had implemented all the TMI Lessons Learned by the end of 1979, as required. The next day, an NRC inspection team found that several modifications had not yet been made. Further discussions with NRC staff only led to further obfuscation. Will we ever know the truth? Will the NRC ever act objectively, free from the need to cover up its own mistakes or perform a public relations job for the utilities?

Aside from the danger and the inadequate regulation, Indian Point has also been unreliable for its ostensible benefit. Since last June, Unit 2 has been off-line for four months, Unit 3 for five. There have been times under all load conditions when both plants were down. Even when operating, they're unpredictable and often far below rated output.

But there are not capacity-related blackouts. We have about 50% excess capacity in New York, 30% even without the nuclear facilities. The utilities like to claim that Indian Point saves ratepayers money by avoiding the use of oil -- but why is oil the only alternative? Indian Point 3 is among PASNY's most expensive power -- the majority of their capacity is hydroelectric. It is only their contract with Con Edison (from their purchase of Unit 3 and Astoria 6 in 1975) which forces downstate New Yorkers to buy their most costly electricity. Can this not be changed, and

can we not take advantage of upstate and Canadian hydroelectric, both existing and potential?

These issues are more involved than can be discussed here -- they must be explored in depth during your investigation. You might want to work with other agencies, such as the Federal Energy Resources Commission, in developing these questions more fully. It is clear, however, that they must be considered.

In conclusion, let us urge you to begin the sort of independent, objective, comprehensive investigation and adjudication that the Union of Concerned Scientists asked for last September. So far, there's no indication that it has started. After (or while) you study Indian Point, you must expand and extrapolate from this investigation to the rest of the nuclear power plants in the United States. We feel, both as neighbors of Indian Point and as concerned Americans, that it is a good place to start.

Fortunately for all of us, it is not yet too late. No accident or rumor has spread panic and death through the New York metropolitan area. -- yet.

If it does, you know where the responsibility lies. Thank you.

Let Nuclear Critics Make Their Case

The nuclear critics who are trying to shut down the reactors at Indian Point, 35 miles up the Hudson from midtown Manhattan, complain that the regulatory game is rigged against them. They are probably right. Consider the cavalier treatment given a recent petition raising serious questions about the safety of the site.

The petition was submitted to the Nuclear Regulatory Commission last September by the Union of Concerned Scientists, one of the more responsible groups critical of nuclear power. It called for the reactors to be shut down while the commission determined whether the site, in such a populous area, was suitable, and if so, whether added safety features were needed. The proposal was hardly radical. Everyone agrees that no reactor should or would be built today in such a densely populated area, and so it was legitimate to ask whether reactors should continue to operate on such a site.

It seemed then, as now, that the chance of a catastrophic accident was so small, and the cost of a shutdown so high, that the reactors should probably keep operating for the rest of their useful lives. But we were not sure, and we looked forward to a full airing of the issues.

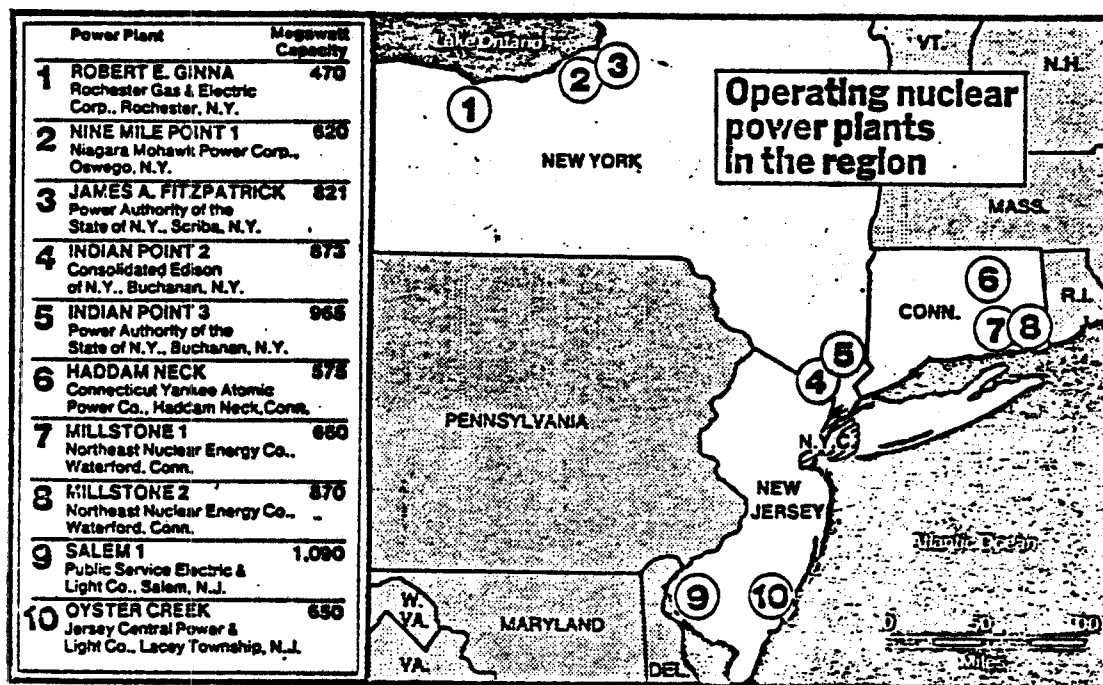
What happened? The petition was referred to the staff of the Nuclear Regulatory Commission, which was already considering safety improvements for Indian Point and for the Zion site, north of Chicago. That staff, of course, is the very group that has allowed these reactors to operate for years. It is hardly likely to

shut them down now and admit that past practice was a terrible mistake. As is customary, the staff met privately with the utilities and negotiated an agreement on safety improvements and further studies.

Then, a public meeting was staged. The critics, still unaware of the staff's final plan, had to speak first; the staff then presented its plan. And the five commissioners, who were also hearing the plan for the first time and were in no position to ask penetrating questions, told the staff to go ahead and carry out the plan. There was no sign at any point in this kangaroo conference that the possibility of a complete shutdown had been given the serious attention it deserves.

This is no way to reassure the public that important questions of safety are being analyzed carefully and impartially. The commissioners are now — after the fact — seeking comments on the merits of the planned improvements and on whether they should hold further hearings. Our vote is an unqualified yes.

The commissioners need to devise some forum in which the critics can make their best case for shutting the plants down and can cross-examine the regulatory staff to bring out its underlying assumptions. The reactors at Indian Point and Zion constitute a large part of the total risk to the American population from nuclear power. Their fate should not be determined in behind-the-scenes deals between a handful of regulators and nuclear plant officials.



Generating Capacity: Our Cup Runneth Nearly Over

By ANTHONY J. PARISI

Last month, in approving New York State's much-debated Master Energy Plan, the state energy planning board noted that because of regulatory delays and other uncertainties it would be "inappropriate to rely on additional nuclear capacity." The board was speaking only of New York State, of course, but it could well have had the entire tristate area in mind. For while nuclear power has slowed to a crawl in most regions of the country, it has come practically to a standstill in the metropolitan area.

And that has raised a question: What — if anything — can take the atom's place in this, one of the most oil-dependent regions in the country?

Ten nuclear power plants are now operating in Connecticut, New York and New Jersey; they account for nearly 15 percent of the nation's nuclear power capacity. Last month, the Connecticut State

which includes most of Pennsylvania and Maryland, all of Delaware and the District of Columbia.

According to the Edison Electric Institute, the trade association for the nation's investor-owned utilities, the Northeast Power Coordinating Council had a reserve margin last year of more than 50 percent. If all the nuclear power plants in that grid were shut down, a spokesman for the institute said, the margin would still be close to 28 percent. The margins in the Mid-Atlantic Area Council, he added, were 42 percent with nuclear power, 19 percent without.

"You have to be careful how you interpret these numbers," commented Charles Komanoff, a consultant who has long opposed nuclear power, "but they show one thing very clearly: Last year, you could have shut down nuclear power in this region if you absolutely had to, and still kept the lights on." And this year, he added, the region's reserve margins are likely to widen as additional nonnuclear capacity comes on line and the demand for power increases.

25 New Safety Features Planned By 2 Indian Point Nuclear Plants

By WOLFGANG SAXON

The operators of two nuclear reactors at Indian Point in Westchester have informed Federal regulators of 25 new safety measures to be instituted at the plants.

The added safety features were reported in a joint announcement by the Power Authority of the State of New York and Consolidated Edison, operators of Indian Point No. 3 and 2, respectively. They acted four days before a meeting, set for Tuesday, of the United States Nuclear Regulatory Commission concerning Indian Point.

The Federal agency said the commissioners would take up the operator's proposals along with recommendations of Harold Denton, director of the agency's office of nuclear reaction regulation.

Indian Point's No. 2 and No. 3 reactors have been shut for refueling, maintenance and repairs, and the Federal commission told the operators earlier this week that they must complete safety improvements before they could resume operations. The State Power Authority and Con Edison said yesterday that, with the proposed modifications, operations of Indian Point No. 3 would resume as scheduled in a few days and No. 2 late this month, also as scheduled.

Plants Draw Demonstrators

Nuclear Regulatory Commission officials noted that the proposed measures had been worked out in cooperation with the commission staff and hence stood a "pretty good chance" of winning the approval of the commissioners, who will act on them after Tuesday's meeting.

In recent months, the nuclear power plants at Indian Point have attracted demonstrators demanding that they be shut down. In addition, there has been legal action seeking to accomplish the same purpose, a Federal investigation of alleged lapses of security and the replacement by the operators of the company providing guards for the reactors.

As reported by the operators, the changes include additional control room personnel on duty at all times, accelerated refresher training of plant operators and "a variety of equipment modifications and other operating procedure improvements."

Some of the changes are to be implemented before the two plants return to service, while the others would be phased in over the next six months, Con Edison and the State Power Authority said.

They added that their submission to Mr. Denton pointed out that protective systems, operating procedures and training at the two reactors had gone "beyond then current practice" from the very time they were designed and built.

Since then, evolving operating and training practices have "kept pace with or gone beyond current regulatory standards and industry norms," the operators asserted.



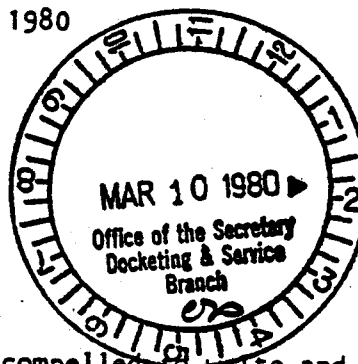
College at Purchase

KEY NUMBER
FBI & UTIL FAC 50-3,243,282
SJD

March 7, 1980

20

Chairman John Ahearne, USNRC
1717 H Street, N.W.
Washington, D.C. 20555



Dear Sir:

As a concerned member of this society I felt compelled to write and encourage you to keep Indian Point Nuclear Plants #1 and #2 closed. I have lived a great deal of my life in Westchester and at the present time my parents live in uncomfortably close proximity to Indian Point.

I know it is obvious to you how dangerous and potentially hazardous nuclear power is. The facts and statistics already point toward very grave possibilities. Further, those elements which are, as yet, unknown seem destined to be not lesser evils but rather greater and more damaging.

I have viewed too much deterioration in our living condition, our environment, and most importantly, our state of mind, to ignore a factor which will inevitably leave irreparable destruction and loss of human life behind from its "accident".

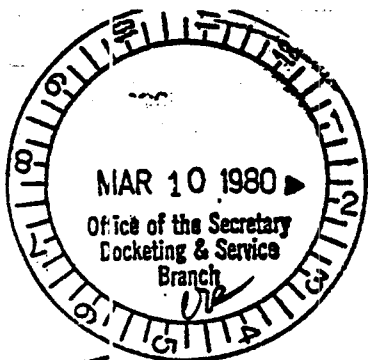
Since the discovery of atomic power there have been scientists who were skeptical and afraid of the experiments taking place in their own field. Today the Union of Concerned Scientists (UCS) are apparently meeting with a great deal of opposition in their attempts to restrain, and critically and logically analyze nuclear power. Their requests do not seem unreasonable to those of us who live in the fear and anticipation of an eminent disaster.

Although this letter is directed specifically at the disarming of Indian Point, you may view it as a general plea for you to support any efforts to make our environment safe and healthy for our generation as well as future generations. Please reexamine nuclear power, give alternative sources a better chance to prove themselves, and support experts who have concerns and doubts. There is already so much that has been lost to extinction, is it too late to prevent adding ourselves to that list?

Thank you very much for your time.

Sincerely,

Amy Lanier Braunhut



DOCKET NUMBER 50-47,276
PROD. & UTIL. FAC. 9+D

SARITA COPELAND
16 WINDSOR ROAD
HASTINGS-ON-HUDSON, NEW YORK 10706

3/7/80

(21)

To the N.R.C. Commissioners,

As a resident of Westchester County,
living within short distance of Indian Point,
I wish to comment on the Union of Concerned
Scientists petition decision, as part of the
"public comment" requested recently.

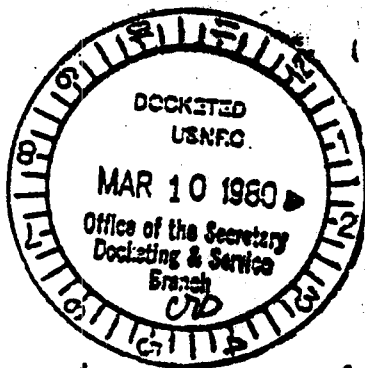
I believe that the decision made on
that U.C.S. petition is totally inadequate,
that the actions taken to improve safety at
Indian Point will not be sufficient to ensure
our safety. I urge that the N.R.C. set
up a new board to deal with Atomic
Safety & also handle the licensing procedure
which could give the U.C.S. petition a
formal hearing; in this way problems cited
by the U.C.S. petition could be heard,
point by point and we could address
ourselves to the dangers of siting,
evacuation problems and the safety of

the physical plant. Then, safeguards could be established in which we could maintain a degree of confidence.

It is important to deal with the U.C.S. petition in a serious and thorough manner and I must say that I and many others were shocked by the casual manner in which it was received and handled.

I would like to see the N.R.C. commissioners themselves make determinations regarding final safety procedures. Meanwhile before this can be accomplished, there is no justification for keeping Indian Point II + III open.

Yours Truly,
Savita Copeland.



DOCKET NUMBER
REGD. & UTIL. FAC 50-3,247,286

199 Larchmont Ave.
Larchmont, New York 10538 (22)
March 6, 1980

To those concerned about a healthy future for all:

I vote Indian Point be closed forever! Why can we not learn from past mistakes? Radioactive poisons are streaming into our air and water each day - it must stop!

In addition to thousands of others working for a future free of the threat of nuclear power, I

- (1) reject Harold Denton's decision on the UCS petition, as inadequate to deal with the serious problems at Indian Point.
- (2) I urge that the NRC set up an Atomic Safety and Licensing Board.
- (3) That this board call adjudicatory hearings in order to compile a factual record and data on items addressed in the UCS petition dealing with problems of siting and evacuation and of safety at Indian Pt. This data-gathering through these hearings is a prime way of assuring adequate procedural safeguards if cross-examination, testimony under oath, and subpoenaing of documents is required. These hearings should be within a 50-mile radius of IP so local residents can participate.

(4) I consider it of critical importance that the NRC Commissioners make the final decisions on the UCS petition, not the licensing board.

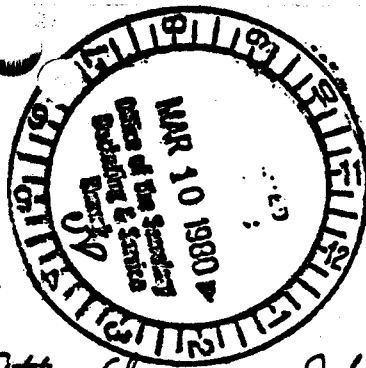
(5) Operation of IP plants 1 and 2 to be suspended while the commission makes its decision.

(6) I wish these actions to be taken in the shortest possible time. Waste is important to those of us living in the shadow of Indian Pt, as we feel the imminent danger of these plants.

I cannot express in words the urgency of this situation. Let us heed the warnings of the past - No, to Indian Point - No, to nuclear power - Yes to life.

Sincerely yours in peace,
Hilda Carlson

Vysa Sahasrabudhe
10x 162.2 SUNY
Purchase, N.Y.
10577



DOCKET NUMBER 50-3,242,286
PROD. & U. FAC. 8+D

①

N.R.C. Commissioners, Attn. Chairman John Ahearne
U.S.N.R.C., 1717 H. Street
N.W. Washington D.C.
20555

③
2

March 5, 1980

Dear Sirs,

This is a public comment on the U.C.S. petition decision recommendation as requested in the Federal Register, calling for a shutdown of Indian Point I & II.

As a concerned student, I reject Harold Denton's decision on the U.C.S. petition, as inadequate to deal with the serious problems at Indian Point.

I urge that the N.R.C. set up an Atomic Safety and Licensing Board. That this board call ~~adjudication~~ hearings, in order to compile a factual record and data on items addressed in the U.C.S. petition dealing particularly with problems of siting and location and of safety at Indian Point. This data gathering in these hearings is a prime way of assuring adequate procedural safeguards (using cross-examination, testimony under oath and subpoenaing of documents). Some of these hearings should be held in the 60 mile radius of Indian point so local residents can participate.

I consider it of critical importance that the N.R.C. Commissioners make the final decisions on the U.C.S. petition, NOT the licensing board.

I want Indian Point II and III's operation suspended during the period the Commission is making its decision.

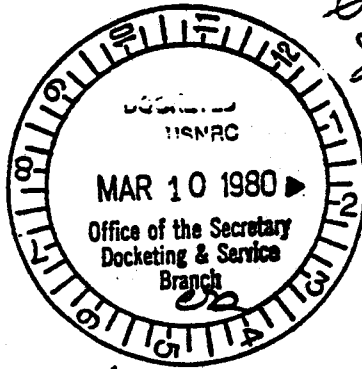
I would also wish to see all of this accomplished in the shortest possible time. For us living in the shadow

of Indian ~~Park~~ speed is very important. I feel the imminent danger from these plants.

Thank you,
a concerned student,

Kyra Sahasrabudhe
3/5/80.

304 Ringgold St.
Beekskill, N.Y. 07566
March 4, 1980



Secretary
N. R. C.
Washington, DC. 20555
Gentlemen,

It is incredible that we who live a mile from the Indian Point Nuclear Plant are being ignored as far as an Evacuation Plan!! You are treating this problem as if it were no problem!

In the event of an accident or an earthquake where do we go? Which roads to travel?

Do we go North, East, West, which way is the wind blowing and who directs the public.

Do we (20,000 in Beekskill, 50,000 people in Cortlandt) try to cross the Bear Mountain Bridge via the narrow, 2 lane winding road around the mountain? Do we try the Two Lane major Route 9 North? To Conn.

cross county on narrow roads which always a tedious route? You tell us!

We need a PLAN!!

Have you no compassion at all? If you won't close the PLANTS as they should be then at least do all in your power to protect us.

Sincerely,
(Mr + Mrs.) Dedon + Helene Farrey

DOCKET NUMBER

PROD. & UTIL. FAC.

50

247,286

9&D

Box 359

IN

Purchase, N. 052

John Ahearn, USNRC

1717 H. St., NW

Washington, DC 20555

Mar 6, 1980

Chairman Ahearn,

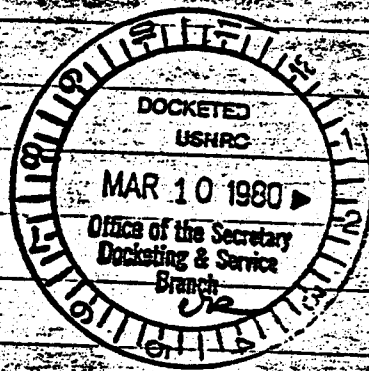
(2)

I live and work and attend school all within 20 miles of Indian Point. I feel threatened daily by the too-likely possibility of leaks and accidents, by waste transport dangers and by the impossibility of evacuation of my area or any of the region surrounding the plants. I fully support the UCS petition to close Indian Point forever. The present shutdown is hardly comforting news, as there is still the possibility of leakage and waste accidents, and the plant itself is a radioactive hazard to local residents. I urge the NRC to revoke the operating licenses of Plants 1 and 2 at Indian Point. I urge that their shutdown be made mandatory and indefinite, while hearings are held and decisions of a more permanent nature are made. Please follow the proposals made in the UCS petition;

the safety and lives of my family, friends and myself are at stake, and I will not rest until the plants are closed and decommissioned.

Thank you

Vicky G de Montigny



Chapman Jon. Ahearn
U.S. Nuclear Reg. Com.
1717 "H" St. N.W.
Washington, DC 20555

2/1/80

DOCKET NUMBER 50-3243-286
PROD. & UTIL. FAC. 342

Dear Mr. Ahearn:

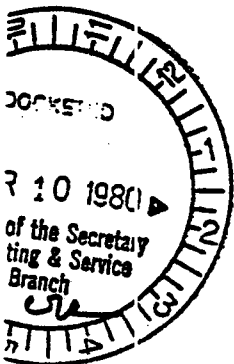
I urge you to consider
the petition by the Union
of Concerned Scientists
and shut down Indian
Point Power Plant.

26

At the very least,
hearings should be held
to examine all of the
safety problems presented
by the plant.

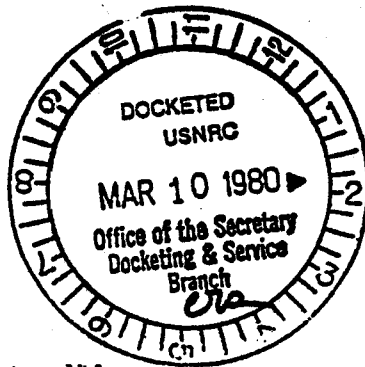
4/ As someone who lives
within 50 miles of the
plant, I am very concerned
with the poor safety
record at Indian Point.

This plant is like a
nuclear bomb in our
backyard. I urge you
to get these hearings
underway immediately.



Candette Bail
Porter Ave
Middlebury, CT 06762

DOCKET NUMBER 50-3,243,286
PROC. & UTIL. FAC.



656 Sherman Avenue
Thornwood, New York 10594
February 25, 1980

U.S.N.R.C.
1717 H Street, NW
Washington, D.C. 20555
Chairman John Ahearne:

27

I am a concerned citizen responding to the NRC request in the Federal Register for public comment on the Union of Concerned Scientist's petition decision, regarding the Indian Point Power Plant shutdown in Westchester County, New York. I would like it known that I, for one, reject Harold Denton's decision on the UCS petition, as inadequate to deal with the serious problems at Indian Point.

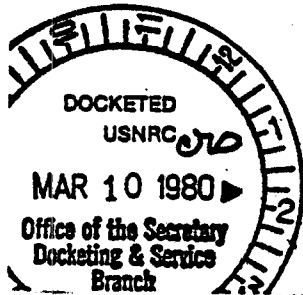
I urge that the NRC set up an Atomic Safety and Licensing Board, and that this Board call adjudicatory hearings, in order to compile a factual record and data on items addressed in the UCS petition dealing with problems of siting and evacuation and of safety at Indian Point. This data-gathering through these hearings is a prime way of assuring adequate procedural safeguards if cross-examination, testimony under oath and subpoenaing of documents is required. These hearings should include a presence in the fifty mile radius of Indian Point so local residents can participate. I consider it of critical importance that the NRC Commissioners make the final decision on the UCS petition, not the Licensing Board. I would also urge that Indian Point II and III's operation be suspended during the period the Commission is making its decision.

I would wish to see all of this accomplished in the shortest possible time. For all of us living in the shadow of Indian Point, speed is very important as the imminent danger of these plants is a constant concern. Thank you for your time.

Yours truly,

Pamela Fletcher

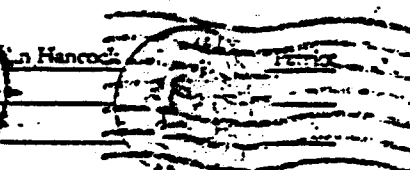
~~As~~ A resident of New York City
I demand the immediate shutdown
of Indian Point. How do you
evacuate 21 million people?



Bubne Lushy

DOCKET NUMBER 59-3,247,286
PROD. & UTIL. FAC. 5+D

28



U.S. Postage 10¢

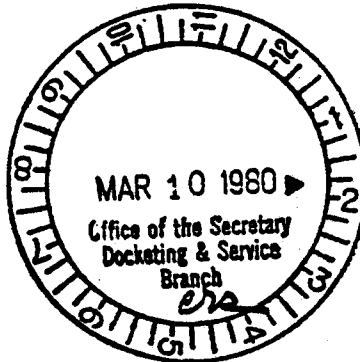
Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C.
20555

COMMENT ON INDIAN POINT AND THE UCS PETITION

DOC# NUM... 50-3,247,286
PROD. UTIL. FAC. SFD

February 25th, 1980

Mr. John Ahearne, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Ahearne:

Our family would like to express our feelings on H. Denton's unacceptable decisions with respect to Units 2 and 3 of the Indian Point Nuclear Facility. The UCS petition raises a great deal of problems and risks with the operation of Indian Point that are not dealt with in the decisions. Denton only suggests changes which underclose scrutiny reveal cosmetic rearrangement. We must protest such an approach to a plant which puts many millions of people in danger!

A course of action that has been suggested (and which has our full support) is the establishment of an Atomic Safety and Licensing Board to conduct public adjudication hearings and compile a factual record on all points raised by the UCS (re: Indian Point). Further we believe that the decision-making responsibility should be in the hands of the Commissioners (not the staff or the ASLB).

In the mean time the forementioned nuclear facility should be closed pending these decisions...for you have been made responsible for the protection of the public.

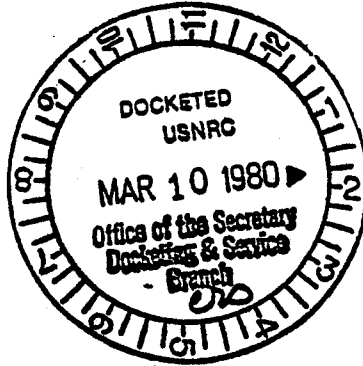
(29)

Sincerely,

Bruce Birnberg
Bruce Birnberg
Mike Birnberg
Mike Birnberg
Shirley Birnberg
Shirley Birnberg

CKET NUMBER
PROD. & UTIL. FAC. 50-3,247,286

34D



38 Ridgewood Terrace
Chappaqua, New York 10514
February 26, 1980

U.S.N.R.C.
1717 H Street, NW
Washington, D.C. 20555
Chairman John Ahearne:

I am a concerned citizen responding to the NRC request in the Federal Register for public comment on the Union of Concerned Scientist's petition decision, regarding the Indian Point Power Plant shutdown in Westchester County, New York. I would like it known that I, for one, reject Harold Denton's decision on the UCS petition, as inadequate to deal with the serious problems at Indian Point.

I urge that the NRC set up an Atomic Safety and Licensing Board, and that this Board call adjudicatory hearings, in order to compile a factual record and data on items addressed in the UCS petition dealing with problems of siting and evacuation and of safety at Indian Point. This data-gathering through these hearings is a prime way of assuring adequate procedural safeguards if cross-examination, testimony under oath and subpoenaing of documents is required. These hearings should include a presence in the fifty mile radius of Indian Point so local residents can participate. I consider it of critical importance that the NRC Commissioners make the final decision on the UCS petition, not the Licensing Board. I would also urge that Indian Point II and III's operation be suspended during the period the Commission is making its decision.

I would wish to see all of this accomplished in the shortest possible time. For all of us living in the shadow of Indian Point, speed is very important as the imminent danger of these plants is a constant concern. Thank you for your time.

Yours truly,

Elsa Fletcher
(Mrs. Elsa Fletcher)
and *Lite Fletcher*

30

DOCKET NUMBER

ROB & UTIL FAC.

50-3,247,281

4 Hollywood Avenue

Yonkers, New York 10707

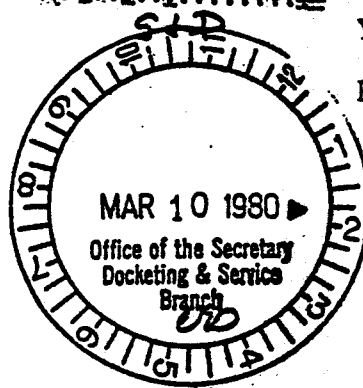
February 24, 1980

U.S.N.R.C.

1717 H Street, NW

Washington, D.C. 20555

Chairman John Ahearne:



(31) I am a concerned citizen responding to the NRC request in the Federal Register for public comment on the Union of Concerned Scientist's petition decision, regarding the Indian Point Power Plant shutdown in Westchester County, New York. I would like it known that I, for one, reject Harold Denton's decision on the UCS petition, as inadequate to deal with the serious problems at Indian Point.

I urge that the NRC set up an Atomic Safety and Licensing Board, and ^{that} this Board call adjudicatory hearings, in order to compile a factual record and data on items addressed in the UCS petition dealing with problems of siting and evacuation and of safety at Indian Point. This data-gathering through these hearings is a prime way of assuring adequate procedural safeguards if cross-examination, testimony under oath and subpoenaing of documents is required. These hearings should include a presence in the 50 mile radius of Indian Point so local residents can participate. I consider it of critical importance that the NRC Commissioners make the final decisions on the UCS petition, not the Licensing Board. I would also urge that Indian Point II and III's operation be suspended during the period the Commission is making its decision.

I would wish to see all of this accomplished in the shortest possible time. For all of us living in the shadow of Indian Point, speed is very important as the imminent danger of these plants is a constant concern. Thank you for your time.

Yours truly,

Donald Williams

Mr. John Ahearn, Chairman
Nuclear Regulatory Commission
1717 H St. N.W.
Washington, D.C.

Dear Sir:

With reference to your request in the Federal Register for public response to the petition of the Union of Concerned Scientists to shut down Indian Point, we respectfully submit the following:

Our interest in the matter derives from the fact that we live downwind from Indian Point, in an area for which there are no evacuation plans and none presently being formed.

We request the suspension of operations of Indian Point #2 until the NRC has reached a final decision on whether and under what conditions the plant can be operated without hazard to the public health and safety.

We ask that an atomic safety and licensing board be established, that such board gather a factual record on the items in the UCS petition, including for this purpose hearings held near the plant, and that the decision on licensing be made by the Commission, not the fact-gathering board.

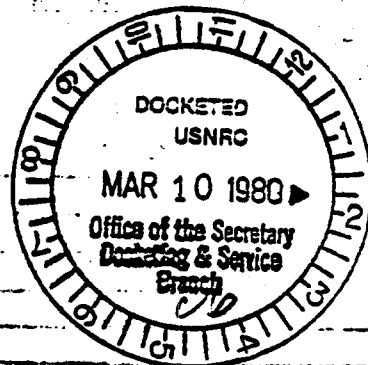
Respectfully submitted,

Donald C. Harrison
Donald C. Harrison

Mary A. Harrison
Mary A. Harrison

Roxbury, Conn. 06087
February 25, 1980

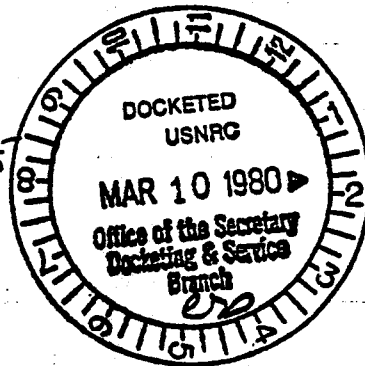
32



Feb 24, 1980

Commissioner Ahearn
NRC

1717 "H" Street NW
Washington, DC 20555



Commissioner Ahearn,

I live 7 miles from the Indian
Point Nuclear Reactor in Buchanan, N.Y.
I am outraged that Harold Denton refused
to act on the Union of Concerned
Scientists Petition -

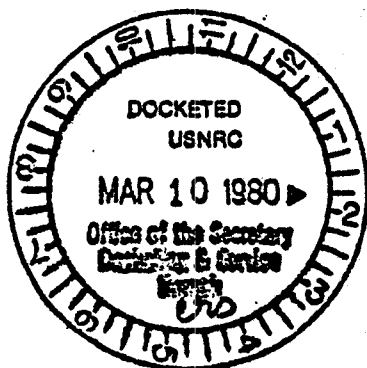
33
We, who live in the immediate area,
demand immediate adjudicatory hearings
take place near Indian Point with
all NRC Commissioners present, to deal
with the issues raised in the UCS Petition.

REC'D MEX 12/10/66
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

We further demand that an
Atomic Safety & Licensing Board be set up
to gather data on health & safety issues
related to Indian Point.

Close Indian Point now, before an
accident takes place & while these very
serious allegations are being investigated.
Our lives are in your hands.

Ervin Kimmerling
ERVINE KIMMERLING
37 PINEY POINT AVE
CRITCHFIELD-HUDSON, NY
10510



DOCK NUMBER
PROD. UTIL. FAC 50-3,247,286

60 E MOUNT AIRY ROAD
CROTON, NEW YORK 10520

February 22, 1980

Honorable John A. Ahearne
Chairman, Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D. C.

Dear Mr. Ahearne:

As a husband, father, resident and home owner living within a five mile radius of the Indian Point nuclear power plant, I was distressed to learn of the dismissal of the petition of the Union of Concerned Scientists which called for the continued shutdown of the power plants until all necessary modifications to protect the safety of nearby residents are made. In view of the fact that evacuation in case of a serious accident is indisputably an impossibility, I hope that this matter will come under your personal review.

I hereby request that the Atomic Safety and Licensing Board be requested to investigate this matter and that pending the outcome of such investigation operation of the plants discontinue. It is further requested that if any further hearings are held with respect to the Indian Point nuclear power plant, that such hearing be held at a venue sufficiently close to the plants to allow area residents easy access to such hearings. It is the local residents who have most at stake in this situation.

I commend the NRC for having held recent hearings in Ossining, New York after initial hearings had gone unpublishized. I hope that a tremendous turnout at the Ossining hearings is ample evidence of the fears and concerns of persons living nearby the power plants.

Very truly yours,

Donald L. Sapir
Donald L. Sapir

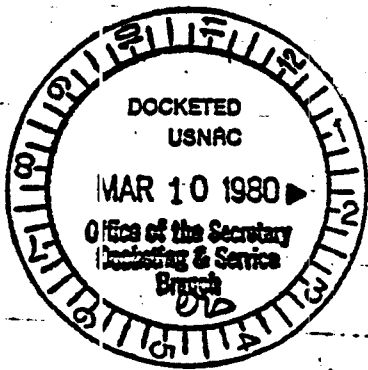
DLS/jw

34

DOCKET NUMBER
A. & UTIL. FAC 50-3,247,286
S+D

Tues. Feb. 26, 1980

Stephen L. Wright
Church St.
Roxbury Ct. 06785



John Ahearn
Nuclear Regulatory Commission
1717 H. St., N.W.
Washington, D.C. 20555

Dear Mr. Ahearn,
Please reject Harold Denton's
decision not to shut down Indian
Point nuclear power station.
I am requesting that an Atomic
Safety and Licensing Board be formed.
This board should compile a factual
record concerning the items on the
Union of Concerned Scientists petition.

(3)

1 am requesting that this be
done through adjudicatory hearings
and that it becomes the basis of
defining procedural safeguards at
the plant.

i request that it be the
commissioners who make the decision
the Union of Concerned Scientists
petition not the Licensing Board.
The ~~licensing~~ Licensing Board should
only be concerned with fact
gathering.

i request that plant operations
be suspended until the commissioners
have made their final decision.

i would also request that
hearings be held within the affected
radius of the plant so that those
at some distance downwind
from the plant might express our

concerns.

i request that this all be done with all possible speed.

Living thirty - ~~five~~ five miles downwind from a plant with such a poor safety and operating record is a matter of great concern to me. Wind blown radiation will not stop at the Connecticut state line though it would seem that all official concern and responsibility does.

i begin to think that the agencies responsible for my well-being are not living up to their responsibilities. It makes me very unhappy that some of my tax monies are being used in such an irresponsible fashion.

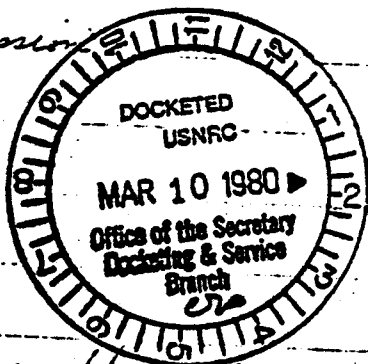
Thank you for bearing with me.

Sincerely

Stephen L. Wright

2-26-80

John A. Kern
Nuclear Regulatory Commission
117 H Street NW
Washington, D.C. 20555



Mr. Aherm:

Please reject Harold

Denton's decision not to shut
down Indian Point nuclear power
station. I also request the following:

- that an Atomic Safety and
Licensing Board be set up
- that a Factual Record be
compiled by said Board of
the items on the Union of
Concerned Scientists petition
- that this be done through
judiciary hearings
- that this Record become the

36

(2)
the means of providing procedural
adequacy.

- that the NRC ~~and~~ make the
use of the U.S. petition and
not the Licensing Board which
is a ~~not~~ fact gathering group.

- suspension of plant operation
until the Commissioners have
made their final decision.

- that hearings be held in
affected radius of the plant so
that those citizens most affected
may attend.

- that the above be done
with all speed.

I have made the above
requests because I live 35 miles
downwind of the Indian Point plants
and know that they have had a

very poor safety record. These aging
unsafe plants could affect the
lives of millions of innocent
citizens many of whom are opposed
to nuclear power and none of which
were asked if they wanted a nuclear
power plant so near by. If fallout
from Chinese bomb tests affects us
then surely the radiation from a
plant such as Indian Point will
affect citizens of New York City and
innsistent. For the sake of 50
million lives I ask you to
stop on my request.

Diana L. Wright
Church St.

Roslbury, Ut 06283

DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,249,286

6914 S. 221 E. Ave.
Broken Arrow, Okla. 74012

Feb. 25, 1980

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Ahearns,

I am very concerned about the Nuclear Power. Industry being brought to a halt by a minority of vocal persons and political pressures. Please, when considering Indian Point in the near future, make sure that decisions regarding Indian Point be made on facts, not politics.

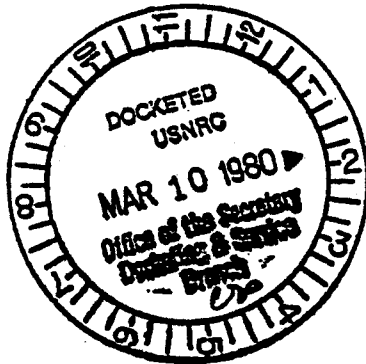
There are many of us who know the importance of nuclear energy to the future of this country and to our children, but we are not as vocal or newsworthy.

Thankyou for your time and consideration.

Sincerely,

A. Arson Basile

A. Susan Basile



NOIENHOF WESTLING
K. 2000 BERNARD
W. 2000 BERNARD
NOIENHOF WESTLING

37

The Hon. John F. Ahearne, Chairman
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:-

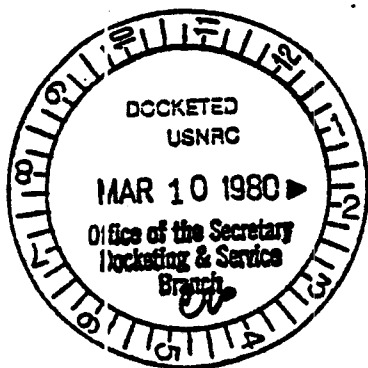
The need for alternative energy sources is more demanding each day. Nuclear energy must be utilized.

I urge you to take whatever actions you can to expedite the safe rehabilitation of nuclear sources, & equally important is the prompt review of companies requests for increases in rates.

I am a widow whose income is grounded upon small investments in utilities, one of which has eliminated its dividends due to the delay in receiving an increase in rates in face of rising costs.

Sincerely

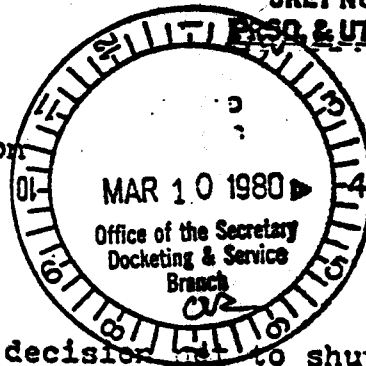
Mrs Clara Fuchs
7220 N. Park Ave.
St. Louis Mo. 63117



Mrs. Fuchs
7220 N. Park
St. Louis, Mo.

38

Dear Chairman John Ahearn,
 Reject Harold Denton's decision



Chairman John Ahearn,

Please reject Harold Denton's decision to shut down Indian Point. An atomic safety and licensing board should be setup and a factual record be compiled by this board on the item's in the Union of Concerned Scientist petition. It should be done through adjudicatory hearings, to become the means of providing procedural safe guards.

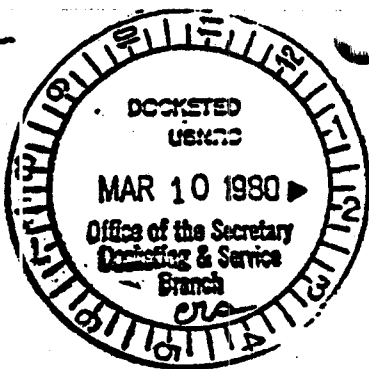
The commisioners should make their decision from the Union of Concerned Scientist petition, not the licensing board. They should should only be used for fact gathering.

Also suspension of operation, until Commisioners have made their final decision. Hearing should be held in the affected radius of the plant, so the public could voice their opinions, and we want it with all speed!!!

I feel this is a dangerous power plant considering its safety record. Plus no adequnt evacuation plans concerning Ct. This reactor must be shut down!
 Sincerely,

(39)

Raye Paris
 New Milford, Ct.



DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,242,286

178 Cowles Road
Woodbury, CT 06798
February 25, 1980

Mr. John Ahearn, Chairman
Nuclear Regulatory Commission
1717 H Street NW
Washington, D.C. 20005

Dear Mr. Ahearn:

I have just heard that Mr. Harold Denton has decided not to shut down the Indian Point nuclear power plant, in spite of the fact that this facility has been proven dangerous. One hears about this plant in the news frequently; we in Connecticut are close enough to be affected, should there be an "accident" there.

I therefore ask you to please reject Mr. Denton's decision not to shut down Indian Point. I would like to see an atomic safety and licensing board set up with factual records compiled by this board. I know that the U.C.S. (Union of Concerned Scientists) has submitted a petition to this effect.

Also, shouldn't there be hearings for those people living in an effective radius of the plant? Since they would be affected in the event of an accident, they should be well informed about how the operators of this plant are guarding against a catastrophe. Where do the people go in case of a disastrous breakdown? To have to ask such a question is scary.

The sensible thing is to shut down Indian Point before there is a catastrophe.

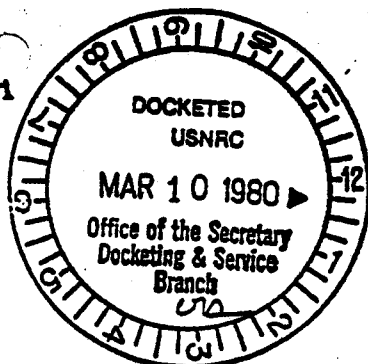
Sincerely,

(Mrs.) Jane Reynolds

41

Safe Energy Alliance // SEA
of -
New York // NY

160 Claremont Ave, NYC 10027



DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,247,286
(S&D)

February 28, 1980

Comment on Decision re: Indian Point-UCS Petition. Federal Docket No. 50-3, 50-247, 50-286.

Mr. John Ahearne, Chairman
United States Nuclear Regulatory Commission
Washington, DC 20555

(42)

Dear Mr. Ahearne:

For months now, we have waited and watched in anticipation of the Nuclear Regulatory Commission's response to the specific issues addressed in the Union of Concerned Scientists' Petition. We are absolutely appalled at the recent decisions made by Harold Denton in regard to the Petition on the Indian Point Nuclear Power Plants, so aptly characterized years ago by a leading spokesman for the Union of Concerned Scientists as "an accident waiting to happen". We all have friends and families in or near Harrisburg, and when we shared their ordeal in conversations and letters after the Three Mile Island accident, we indeed felt that but for fate, it could have been us. The question remains: when will it happen here?

We strongly oppose the manner in which the substance of the UCS Petition was glossed over, and demand, as taxpayers and citizens who reside within some thirty miles of these reactors, that the commissioners assume full responsibility for careful scrutiny of each item in the UCS Petition to ensure accountability for public health and safety. Previous "pass-the-buck" policy which led to the disastrous Three Mile Island "incident" is no longer acceptable to the American people.

The UCS Petition, in section 65, specifies procedures outlining establishment of an Atomic Safety and Licensing Board to conduct full and public adjudication hearings and compile a factual record of all items requested by the Union of Concerned Scientists. When this has been completed, the commissioners must assume full responsibility and accountability for decision-making.

Until the above steps have been taken, and all the problems outlined in the Petition resolved, we call on the Nuclear Regulatory Commission to immediately suspend operation of the Indian Point Plants 2 and 3.

Sincerely yours,

Barbara Charles

Ms. Barbara Charles, Coordinator
Safe Energy Alliance of New York

CC: Senator Ted Kennedy
Senator Gary Hart
Senator Jacob Javits
Governor Hugh Carey
NYS Assemblyman Stanley Fink
Mr. George Bush

ROCKLAND COUNTY LEGISLATURE
2 NEW HEMPSTEAD RD
NEW CITY NY 10956

western union

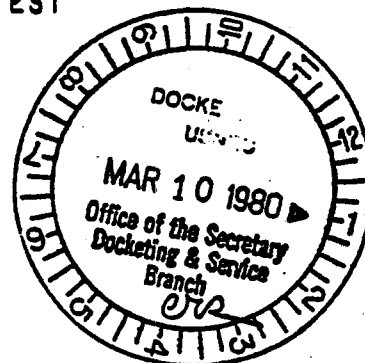
Mailgram



4-071983S064 03/04/80 ICS IPHMTZZ CSP WSHB
9144255100 MGM TDMT NEW CITY NY 260 03-04 0730P EST

NUCLEAR REGULATORY COMMISSION, U.S.
GOVERNMENT, ATTN SAMUEL J CHILK SECRETARY
1717 H ST NORTHWEST
WASHINGTON DC 20555

43



SUBJECT: CONSOLIDATED EDISON COMPANY OF NEW YORK (INDIAN POINT, UNIT #2), POWER AUTHORITY OF THE STATE OF NEW YORK (INDIAN POINT, UNIT #3), DOCKET NUMBERS 50-247, 50-286

ATTN SAMUEL J CHILK, SECRETARY

I HEREBY REQUEST YOUR FURTHER EXTENSION OF REVIEWING THE DIRECTORS DECISION FROM MARCH 17, 1980 UNTIL APPROXIMATELY MAY 1, 1980, AS YOU KNOW I APPEARED AND GAVE TESTIMONY IN SUPPORT OF THE PETITION FILED BY THE UNION OF CONCERNED SCIENTISTS. AT THAT TIME THE MULTI-SERVICES COMMITTEE VOTED TO SUPPORT SUCH A POSITION. THE FULL LEGISLATURE OF THE COUNTY OF ROCKLAND REVIEWED THE MATTER ON FEBRUARY 26, 1980. IT WAS THE LEGISLATURES FEELING THAT AS STATED IN THE SEPERATE VIEWS OF COMMISSIONER GILINSKY THAT THESE IMPORTANT QUESTIONS SHOULD BE THE SUBJECT OF FURTHER PUBLIC COMMENT. IN THAT LIGHT THE LEGISLATURE TABLED ITS RECOMMENDATION FOR A PERIOD OF 30 DAYS PENDING FURTHER PUBLIC FORUM DISCUSSION OF THESE MATTERS.

SINCE YOU HAVE ALREADY TWICE DECIDED TO EXTEND THE TIME WITHIN WHICH THE COMMISSION MAY FINALIZE ITS POSITION ON THIS MATTER I FEEL THAT A FURTHER DELAY WOULD BEST SERVE THE PUBLIC INTEREST. ROCKLAND COMMUNITY COLLEGE WILL BE HOSTING A SERIES OF PUBLIC FORUMS ON THIS ISSUE AND I INVITE YOUR PARTICIPATION AND FEEL THAT THIS WOULD SERVE OFT SIDED CONCERN THAT ADEQUATE PUBLIC PARTICIPATION BE INVOLVED. IF YOU HAVE ANY FURTHER QUESTIONS PLEASE FEEL FREE TO REACH ME AT 914 352 5515.

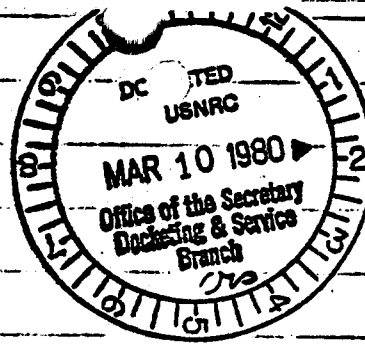
VERY TRULY YOURS

SAM ZALMAN GDANSKI, ROCKLAND COUNTY LEGISLATURE, NEW CITY, NEW YORK

21:05 EST

MGMCOMP MGM

Nuclear Regulatory Commission
1717 H. St. N.W.
Washington, D.C. 20555



Dear Mr. Aikane,

(44)
In response to the request for comment published in the Federal Register, my wife and I would like to strongly urge your commission to support the Union of Concerned Scientists' petition concerning the Indian Point Nuclear Power Plants.

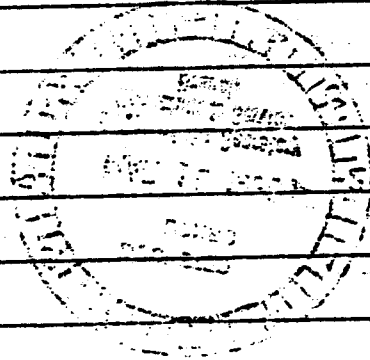
We understand that a committee headed by Dr. Harold Denton has advised ~~you~~ the commission to not shut these plants down. We strongly object to this recommendation. Living as we do ~~is~~ within a 50 mile range of the plant, we feel that the safety features of the plant are inadequate. Additionally, there is no evacuation plan for people living within 50 miles of the plant. Due to the fact that approximately 19 million people live within 50 miles, we believe this plant poses an immediate threat to the ~~safety of~~ safety of the surrounding communities.

We urge that the commission make its own decision on the petition submitted by the Union of Concerned Scientists and concern itself only with the safety of these plants.

It is not our intention to cause
undue harm to the companies which own
the plants. However we believe that the
threat posed by these unsafe plants
outweigh any economic considerations.

Sincerely yours

Jay and Laurie Hubbank
Woodbury Rd.
Washington, Ct 06293



Karen Eberhardt
21 Boulderbrook Rd.
Wilton, Conn. 06897

D+S

24 Feb. 1980

Dear Mr. Ahearn,

I am writing in response to the petition of the Union of Concerned Scientists, UCS, to shut down Indian Point.

I submit that Harold Denton's decision not to shut down Indian Point is based on inadequate and erroneous information.

I would like to request that an Atomic Safety and Licensing Board be set up.

In the interests of those millions of individuals living within a 50 mile radius (of which I am one) of Indian Point, I urge that a factual record based on those items mentioned in the UCS report be compiled.

I feel strongly that commissioners should make a decision on the UCS petition, not the licensing board (which should be used only for fact-gathering).

I urge a suspension of these nuclear power plants until commissioners have made their final decision.

It is of utmost importance that hearings be held within the affected radius of the plant, and arranged at such a time that concerned citizens will be able to be present.

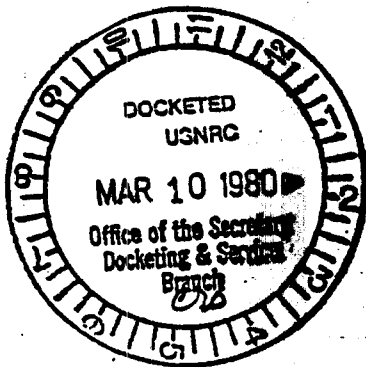
The above should take place at the earliest possible moment. This is an issue that concerns my health and safety and I am extremely concerned about protecting my well-being and that of every other living thing in this area.

Most sincerely,

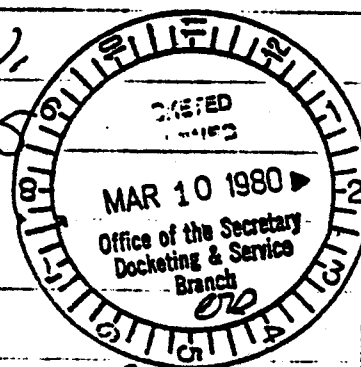
Karen Eberhardt

Karen Eberhardt

45



NRC
1717 "H" Street, N.W.
Washington DC 20555



(46) Sir:

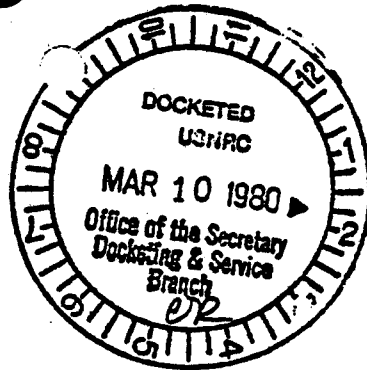
It is outrageous that Harold Denton should have been allowed to make recommendations regarding the petition prepared and presented by the Union of Concerned Scientists. The staff which is responsible for the present condition of nuclear operations should not evaluate their own decisions.

We who live within ten miles of the most dangerous reactor in the United States, and our friends and families, demand immediate

~~are present~~
Point, with all NRC Commissioners present, to deal with the issues raised in the UCS petition. The outcome of the hearings should be creation of an Atomic Safety and Licensing Board to gather data on the items, crucial to the health and safety of millions of people, outlined in the UCS petition.

All the reactors at Indian Point must be SHUT DOWN pending these hearings.

Sincerely,
A. Patricia P. Bova
22 Park Trail
Croton NY 10520



March 2, 1980

Dr. Mr. Ahearne,

I'm appealing to you as one human being to another. You hold a powerful position in an agency that can literally save thousands of lives by closing the most dangerously situated nuclear power plant in the nation, Indian Point in Buchanan, New York.

I live with my husband, Dale, and my two children, Naomi and Kyle, ages 8 and 3 respectively, in Yorktown Heights, just seven miles from the Indian Point reactors. I feel that the continued operation of these reactors constitutes a very real threat to the health and well-being of my family. I'm beginning to understand that there is no safe dose of radiation, however small it might be. Even the small amount of low-level radiation emitted by a normally operating reactor can, over the long run, cause cancer, leukemia, and genetic defects that can be passed on to future generations. Mr. Ahearne, please believe me when I say that I don't want to put you out of a job, but can't we find a way to shut down those nukes, and give our kids a better chance at a healthy future? Is it worth it to add one more horrendous pollutant to their already poisoned world? Plutonium is virtually forever, and we must all bear in mind that our children are our most valuable resource.

The Union of Concerned Scientists presented a petition to the N.R.C. in September that raised several valid points. As I'm sure that you've seen the petition, we certainly don't have to go into them now. Harold Denton's decision to throw out the petition and recommend safety improvements that are peripheral to really making those plants safe, are totally unacceptable to me. I wonder if he would have made those same recommendations if he lived within 10 miles of Indian Point.

We who do live near Indian Point are not expendable. By telling us that in the event of an accident there, all we have to do is take shelter in our homes, you are telling us that we ARE expendable, because we know that should a serious accident occur, deadly radioactive fission products cannot be kept out by doors and windows....which brings us to the question of evacuation. You know as well as I do that in an area as densely populated as Northern Westchester, all evacuation plans will fail. Even the best laid plans will break down when you are talking about 19 million people who live within 60 miles of the plants. Neither is there a viable plan for New York City.

An Atomic Safety and Licensing Board should be set up to gather all factual data pertaining to the U.C.S. petition. There should be a suspension of operations at Indian Point reactor #2 and #3 until a final decision is made through adjudication hearings as to whether the reactors are safe enough to operate at all. These hearings should take place within a 50 mile radius of Indian Point.

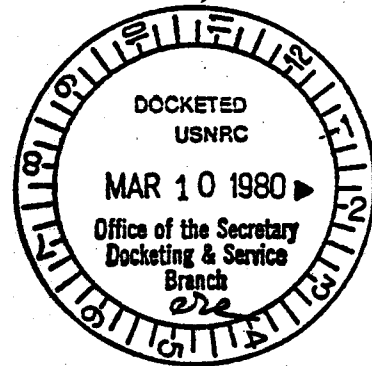
Please give this matter serious consideration because our lives, and the lives of your children as well, hang in the balance.

Thanking you in advance for your concern,

Ellen Saltzman
3091 Hickory St.
Yorktown Heights, N.Y. 10598

26, 1980

John Ahearn
NR C



Dear Mr. Ahearn,

I am writing in support of the UCS
petition to shut down the Indian Point
reactors. I do not see any way that
you can legitimately refuse to
immediately suspend operations there.

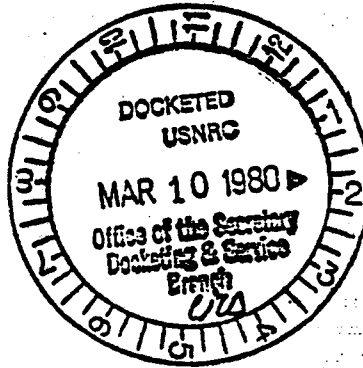
The charges made by UCS require
very complete and specific answers
before operations should be permitted.
General assurances are not an adequate
answer.

It may sound presumptuous, but you
seem to have a clear opportunity to make a
moral decision of great importance, and
I offer you my support (for what it's worth) if
you decide to do so.

Sincerely,

Robert Davis

DOCKET NUMBER
PROD. FILE FAC. 50-3 247,286



Treasure Hill Road
South Kent, Ct. 06785
February 26, 1980

Mr. John Ahearn, Chairman
Nuclear Regulatory Commission
1717 H. Street NW
Washington, D.C. 20555

Dear Sir:

This letter is in reference to the Federal Register request for public response to the Union of Concerned Scientists petition to shut down Indian Point Nuclear Station.

I urge the Commission to reject Mr. Denton's decision not to shut down. I ask the Commissioners to set up an Atomic Safety Licensing Board for the purpose of compiling facts on the items of the petition; that the Commissioners themselves make the decision on the petition, not the licensing board. I favor suspension of the plant's operation pending the decision. I ask for hearings to be held in the affected radius of the plant, and that these requests be met with all speed.

I am vehemently opposed to nuclear power for energy production. Its cost in dollars, health, and peace of mind indicate nothing short of disaster for the future of mankind, and mandate an exploration of all other possible sources of energy. I urge the Commissioners to heed this letter and others like it, to make the decision that may save millions of lives.

Sincerely,

Françoise Brunette

Françoise Brunette

OFFICE OF THE SECRETARY
DOCKETING & SERVICE SECTION
NUCLEAR REGULATORY COMMISSION

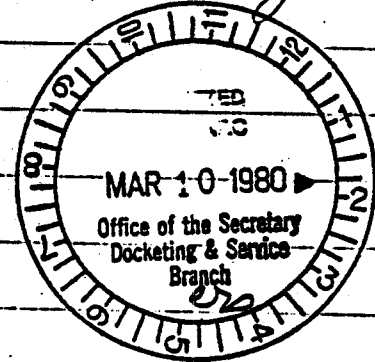
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08-25-80

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101 Westwood Ave
Watertown CT 06702
24 February 1980

(50)
Channing J. H. Cleaver
U.S. Nuclear Regulatory Commission
1717 "H. St., N.W.
Washington, D.C. 20535



Re: Shut Down of Indian Pt. Nuclear

Dear Sir:

In response to the Federal Register request for Public Response to the petition of the Union of Concerned Scientists, ^(we) I am strongly in favor of this petition, and, strongly urge you reject the decision of Harold Heston ~~in decision~~ not to shut down Indian Pt.

I ask that you create or influence a board be set up on safety and licensing, and that a factual record be compiled on items in the U.C.S. petition. This to be done through adjudicatory hearings for providing

procedural ~~is required~~

He asks that the Commissioners make decisions on the U. of Concerned Scientists petition, not the licensing board, which should be only for fact gathering.

He wants a suspension of plant operation till the commissioners have made their final decisions.

The hearings should be held in the affected radius of the plant so we can be heard.

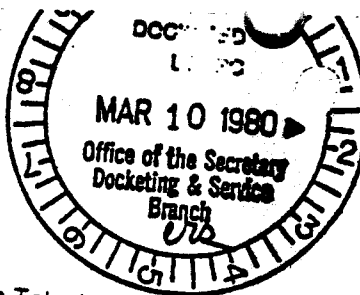
I feel particularly threatened by this lethal plant and hope you can bring justice to a situation that demands immediate attention to what ~~the~~^{may be} the lives of hundreds of thousands of people.

With all sincerity,

Carolyn Bee King
James G. King



**INSTITUTE
FOR
WORLD
ORDER**



DUCKET NUMBER
PROD. & UTIL. FAC 50-3,247.2
94D

777 United Nations Plaza, New York, NY 10017 • Telephone: 212 490-0010 • Cable address: WORLDORDER NEW YOF

February 25, 1980

Mr. John Ahearne, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Ahearne,

The following are my comments concerning Indian Point and the decisions by Harold Denton on the UCS Petition.

Harold Denton's decisions regarding Indian Point are an insult to those put human physical and psychological well-being ahead of the mechanics of 'progress' and profit. The dangers to public safety in the areas surrounding Indian Point, extending to the populated regions around New York City, remain such that residents' lives and peace of mind are severely jeopardized. Indian Point must not be permitted to continue operation until all questions raised by the UCS petition are --not superficially addressed--but resolved. There is too much at stake to consider another approach.

Furthermore, I appeal to you establish an Atomic Safety and Licensing Board, as recommended in section 65 of the UCS petition, to conduct hearings and compile a factual record concerning Indian Point.

The weight of these decisions is such that you bear sole responsibility; I cannot accept any circumstances where you delegate this decision to others outside of the Commissioners. I find it difficult enough to leave this question in their hands.

As you proceed to consider long term decisions with respect to Indian Point, I expect that you will have the prudence and respect for area residents to close the facility.

Although the sentiments expressed herein reflect the opinions of numerous colleagues, I am conveying a personal, and not official Institute for World Order position.

With respect for your difficult and solemn responsibility,

Richard Perl
Richard Perl

WORLD ORDER VALUES • peace • social justice • economic well-being • ecological balance

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University of Iowa

CONSULTANT

Betty A. Reardon
Teaching and Curriculum

Heritage Village Peace Council

54D

P.O. Box 693
Southbury, Connecticut 06488

February 28, 1980

Mr. John A. Hearn, Chairman
Nuclear Regulatory Commission
1717 H Street, N W
Washington, D. C. 20555

Re: Federal Register Request for Public Response to Union of Concerned
Scientists' Petition to Shut Down Indian Point Nuclear Power Plant.

Dear Sir:

Regarding the above subject matter, please reject Harold Denton's
decision not to shut down Indian Point as an inadequate decision. Re-
quest that an atomic safety and licensing board be set up. The board
would be required that the factual record be compiled by them on the
items in the UCS petition.

This should be done through adjudicatory hearings which should become
the means of providing procedural safeguards.

We ask that the commissioners make the decision on the UCS petition,
not the licensing board, which only should be used for fact gathering.
We want a suspension of the plant operation until the commissioners have
made their final decision.

Hearings should be held in the affected radiums of the plants so that
we can be there.

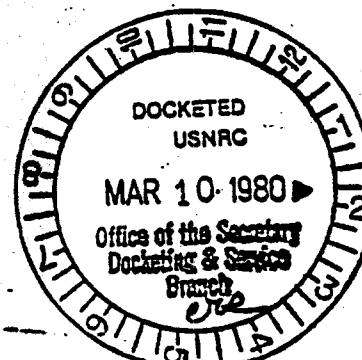
We want it done with all speed -- we just can't afford another
Three Mile Island happening.

Respectfully yours,

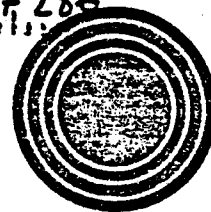
Jacob Grobstein

Jacob Grobstein
Chairman

mhf



DOCKET NUMBER
PROD. & UTIL. FAC. 50-3,247,286
S+D



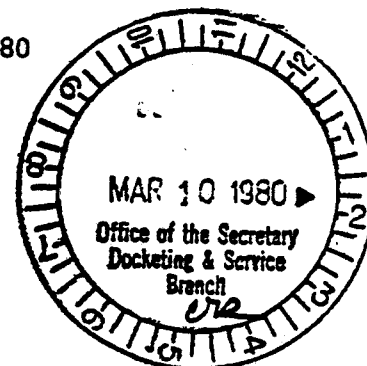
FUSE

THE FUND FOR SECURE ENERGY, INC. 21 CHARLES STREET WESTPORT, CT 06880 (203) 226-7911

John Aristotle Phillips,
Chairman

John Coffee,
Executive Director

March 7, 1980



53
John Ahearn, Chairman
Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Dear Mr. Ahearn:

I am writing in response to the Federal Register's request for public response to the petition of the Union of Concerned Scientists to shut down the two operating Indian Point units.

FUSE is of the opinion that, not only should the units be shut down, but the NRC will never achieve any credibility as to its concern for safety at nuclear plants until that shutdown occurs. While these plants, within range of such a large population, near an earthquake fault, near New York City's public water supply, and with all the problems they have had, are allowed to operate, no one can possibly see the NRC as anything more than a rubber stamp agency for the nuclear industry.

In the name of sheer good sense and sanity, please set public hearings in the area of the plant regarding the UCS petition, and suspend operations at Indian Point until and unless all these concerns are realistically addressed.

Sincerely,

John Aristotle Phillips

John Aristotle Phillips
Chairman

JAP:ja

DOCKET NUMBER 50-3,247,286
ROD & UTIL. FAC. S+D

Queens Safe Energy Coalition
140-10 Franklin Avenue
Flushing, New York 11355

Queens Safe Energy Coalition Comment
on
UCS Petition and Indian Point Decisions by Harold Denton
(Federal Register Docket No's. 50-3, 50-247, 50-286)

March 7, 1980

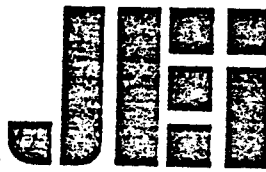
Dear Mr. Ahearne:

(54)
We and our neighbors are very concerned about the safety problems and poor safety standards at the Indian Point nuclear plants. In its petition to the N.R.C., the Union of Concerned Scientists addresses these critical questions and proposes wise, effective procedures for dealing with Indian Point. The recently announced decisions by Nuclear Reactor Regulations Director, Harold Denton, focus on peripheral issues and propose trivial operating adjustments and studies while irresponsibly avoiding the core of the U.C.S. petition, in our opinion.

You and your associate commissioners are ultimately responsible for our lives and the lives of our neighbors - all 19 million. Please use your power to suspend Indian Point's operation immediately while seriously dealing with the critical points of the U.C.S. petition. These include, among others, establishing an Atomic Safety and Licensing Board that will assemble a public record of all Indian Point related information and will judge, in open hearings, all aspects of the situation publicly and fairly.

Queens Safe Energy Coalition
Queens Safe Energy Coalition





BUCKET NUMBER 50-3,247,286
PROD. & UTIL. FAC. S&D

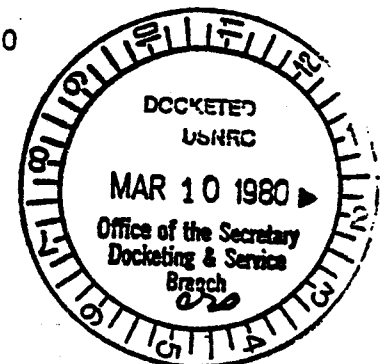
NEW YORK STATE COMMITTEE FOR
JOBS AND ENERGY INDEPENDENCE

Chairman
Pete J. Brennan

Executive Director
Robert W. Searby

March 7, 1980

5
Commissioner Joseph Hendrie
Nuclear Regulatory Commission
1717 H. Street, N.W.
Washington, D.C. 20555



Dear Commissioner Hendrie:

Many New Yorkers were relieved upon hearing the recent decision by Harold Denton permitting the continuing operation of Indian Point nuclear units. The members of JEI throughout New York, among whom are thousands of organized workers, were especially relieved. Over the past year, we have come to realize the severe impact a shut-down would have on our jobs, livelihood, families and local communities.

Because of our scandalous dependence on foreign oil for electric generation, New York's loss of employment, industry, tax revenue, and work force have already reached crisis proportions. The last thing New Yorkers can afford is the loss of the only two major, non-oil generating units we have in the region. That is why we were deeply relieved to hear Harold Denton's prudent decision to approve the continuing operation of the Indian Point units. But now, we are threatened by a possible re-evaluation of that decision.

There comes a time in any regulatory case when a responsible agency makes a decision and stands by it. On Indian Point that time has certainly been reached. The members of JEI hope you will agree with us, let Mr. Denton's decision stand, and not join in any effort that might deny New Yorkers one of their few options to OPEC blackmail. Considering our inflation rate and foreign crisis, we need Indian Point now more than ever. Further hearings and re-evaluations will only extend our uncertainty and undermine confidence in our local economy.

Sincerely,

Peter J. Brennan
Peter J. Brennan
Chairman

PJB:ce