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May 19, 2014

Ms. Lisa Jarriel  
Allegations Coordinator  
USNRC  
Washington DC

Subject: Indian Point Allegation

Dear Ms. Jarriel:

It is my understanding that Spectra Energy Corp is proposing to make modifications to the present gas transmission lines that traverse the Indian Point site boundary. According to media reports this project is presently under review by the Federal Energy Regulatory Commission in Washington. This proposed line will more than double the present capacity and will consist of a 42 inch "high pressure" line and also a new compressor station to be located near the site.

This new line will pass within the vicinity of the Indian Point site therefore the requirements of 10 CFR 100.20 must be considered.

*Factors to be considered when evaluating sites.*

*The Commission will take the following factors into consideration in determining the acceptability of a site for a stationary power reactor:*

*(b) The nature and proximity of man related hazards (e.g., airports, dams, transportation routes, military and chemical facilities) must be evaluated to establish site characteristics for use in determining whether a plant design can accommodate commonly occurring hazards, and whether the risk of other hazards is very low.*

The impact of failure of these lines is discussed in various documents including the UFSAR, Safety Analysis Reports and other docketed communications therefore is part of the Current Licensing Basis as defined in 10 CFR 54.3.

My specific concern is that Entergy and the NRC have no plans to evaluate this significant modification as required by 10 CFR 100.

This evaluation must include the following considerations which may cause a failure resulting in an explosion and fire from a ruptured line:

1. Impact on Indian Point during the construction of the new transmission line and the tie in to the existing lines.
2. Possibility of seismic events damaging the new and existing gas transmission lines.
3. Terrorist actions that may result in damage to the gas lines and the plant.
4. Ability of onsite and offsite response capabilities to terminate and extinguish a high pressure gas line fire.
5. Ability to terminate the flow of gas from both the upstream and downstream gas sources.

Please consider this a formal allegation as I understand that Entergy has no plans to address the requirements of 10 CFR 100 and plans no changes to the UFSAR along with any safety evaluations that may be required due to this significant hazard presented by the new gas transmission line.

Please inform me as to Entergy's and the NRC's plans to perform the analysis for this modification as required by 10 CFR 100.



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