The conference call was held, Christopher Miller, Chairperson of the Petition Review Board, presiding.

PETITIONER: PAUL BLANCH

PETITION REVIEW BOARD MEMBERS

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MR. PICKETT: Good afternoon. I'd like to thank everybody for attending this meeting. My name is Doug Pickett, and I am the Indian Point project manager. We are here today to allow the Petitioner, Mr. Paul Blanch, assisted by Mr. Richard Kuprewicz of Accufacts Incorporated, to make a second presentation in support of his petition before the Petition Review Board, also referred to as the PRB. I am the petition manager for the petition. The PRB chairman is Mr. Christopher Miller.

As part of the PRB review of this petition, Mr. Paul Blanch has requested this opportunity to address the PRB. In accordance with NRC Management Directive 8.11, the purpose of today's second presentation is to allow the Petitioner to comment on the initial recommendation of the PRB and to provide additional information that supports the original petition.

Today's meeting is scheduled from 2:30 to 3:30 p.m. Eastern time. The meeting is being recorded by the NRC Operation Center and will be transcribed by a court reporter. The transcript will become a supplement to the petition, and the
transcript will also be made publicly available. I'd like to open this meeting with introductions. As we go around the room in here, in NRC headquarters, in Rockville, Maryland, please be sure to clearly state your name, your position, and the office that you work for within the NRC. I'll start with myself. I'm Doug Pickett. I'm the NRR project manager for Indian Point, and I'm the petition manager for this petition.

CHAIR MILLER: My name is Chris Miller. I'm the PRB chairman, and I'll be speaking with you in a minute.

MR. BEASLEY: Ben Beasley. I'm a board member. I'm also a branch chief in the Division for Operating Reactor Licensing.

MR. CYLKOWSKI: This is David Cylkowski. I'm an attorney in the Office of General Counsel.

MR. THOMPSON: William Thompson. I'm a senior special agent with the Office of Investigations.

MR. BEAULIEU: I'm David Beaulieu. I'm a board member. I'm the project manager in the Division of Policies and Rule Making.

MR. TAMMARA: I'm Rao Tammara. I'm a technical reviewer in NRO [Office of New Reactors].
MR. MCCOPPIN: Mike McCoppin, chief of the Radiation Protection and Accident Consequence Branch, Office of New Reactors.

MR. GILBERTSON: Anders Gilbertson, reliability and risk analyst, Office of Research.

MS. HAUSER: Jenny Hauser, project manager, Division of Operating Reactor Licensing.

MR. WRAY: John Wray, along with Robert Carpenter, from the Office of Enforcement.

MR. DUDEK: Michael Dudek, acting chief for Project 1 Branch.

MR. PICKETT: Okay, we've completed the introductions of the NRC headquarters. At this time, are there any NRC participants from headquarters on the phone?


MR. PICKETT: Okay, are there any NRC participants from the regional office on the phone?

MR. SETZER: Yes, this is Tom Setzer, senior project engineer for Project Branch 2.

MR. BURRITT: Art Burritt, branch chief responsible for inspections at Indian Point.

MR. KROHN: Paul Krohn, branch chief, DRS engineer.
MR. PICKETT: Are there any representatives for the Licensee on the phone?

MR. WALPOLE: Yes, Doug. It's Bob Walpole, regulatory assurance manager. With me is Steve Prussman, and also John Skonieczny, and we have more people from Entergy listening in.

MR. PICKETT: Mr. Blanch and Mr. Kuprewicz, would you please introduce yourselves, along with anyone else assisting you, for the record?

MR. BLANCH: At the time, there's no one else. Dave Lochbaum, if he has time, may be calling in.

MR. PICKETT: Okay. I'd like to emphasize that we each need to speak clearly and loudly, to make sure that the court reporter can accurately transcribe this meeting. If you have something that you would like to say, please first state your name. At this time, I'll turn this over to the PRB chairman, Chris Miller.

CHAIR MILLER: Good afternoon, and thank you for joining us. We appreciate the information we've received so far during this process, as the Board is using the information to make our decision. We look forward to the information you've provided us today. I'd like to first share some background.
Section 2.206 of Title 10, Code of Federal Regulations, describes the petition process, the primary mechanism for the public to request enforcement action by the NRC in a public process. As Doug mentioned, our guidance for 2.206 comes from Management Directive 8.11, and that's publicly available. The focus of today's meeting is a follow up to get any information that the Petitioner wants to provide us so that we can make our final decision, and for the Petitioner, with any other support that he has, to provide that information, and any other perspectives on our decision process so far.

The public will be provided the opportunity to provide comments regarding the petition.

(Telephonic interference.)

CHAIR MILLER: The purpose of the meeting is not to provide an opportunity for questioning the PRB's decision so far, but more to gain additional information to help support and make the decision. It's not a hearing. It's not an opportunity to go into the merits of, as I said, the decision making, other than to provide additional information into that decision making.

We're not going to make a decision in
this forum here. We're going to seek information and
have a separate PRB meeting to consider the
additional information that has been cited.
Following this meeting, the Petition Review Board
will conduct a deliberation, and the outcome of the
internal meeting will be provided to the Petitioner.
The PRB typically consists of a chairman, a manager
at the senior executive level, a petition manager,
and a PRB coordinator. As described in our process,
the NRC may ask clarifying questions in order to
better understand the Petitioner's presentation and
reach our reasoned decision whether to accept or
reject the Petitioner's request.

At this time, I want to summarize the
scope of the petition that we are considering within
the Board. On October 15, 2014, Mr. Blanch submitted
a 2.206 petition to the NRC regarding the 50.59 Site
Hazards Analysis prepared by Entergy, the Licensee
for Indian Point. A 50.59 analysis was performed by
the Licensee to determine the safety impact on the
Indian Point plant due to Spectra Energy’s proposed
42-inch diameter natural gas pipeline that is planned
to traverse a portion of the owner-controlled
property at the Indian Point facility.

In the petition, Mr. Blanch requests that
the NRC take enforcement action against Entergy, the Licensee, for a violation of 50.9, Completeness and Accuracy of Information, for providing inaccurate or incomplete information in the 50.59 Site Hazards Analysis. In violation of 10 CFR [Code of Federal Regulations] 50, Appendix B -- that's the quality assurance criteria -- they're relying on a contractor who is not qualified in accordance with Appendix B requirements, who is not qualified in accordance with Entergy's quality assurance program, and as a result, was not qualified to perform an analysis for such a significant safety-related issue in violation of 10 CFR 50.59 -- that's our changes, tests and experiments chapter -- for failing to perform the necessary safety evaluation requirements.

The Petitioner supplemented his petition with a number of documents that address the following: the need for an independent assessment of the proposed pipeline, the assumed three-minute closure time for the pipeline isolation valves, the impact of the proposed West Point Partners high-voltage, direct-current transmission cable, deficiencies with the NRC's Independent Confirmatory Blast Analysis, including the status use of the ALOHA computer code, and improprieties by the NRC staff.
The latter concern has been forwarded to the NRC Inspector General's office.

Allow me to discuss the NRC activities to date. There's been a number of communications with Mr. Blanch, but let me highlight the ones that are pertinent to this process. On January 28th, the Petitioner, with the assistance of Mr. Richard Kuprewicz, of Accufacts, made their first presentation before the PRB. On April 28th, the Petitioner was informed that the initial recommendation of the PRB was to reject the petition on the basis that the NRC staff has previously reviewed and resolved the issues identified in the petition.

Subsequently, the petitioner was offered, and accepted, a second opportunity to address the PRB. There's just a couple of final things and I'll wrap up. As a reminder for the participants, please identify yourself if you make any remarks, as this will help us in the preparation of the meeting transcript that will be made publicly available, just like the last transcript was made available.

At the end of the meeting, members of the public may provide comments regarding the petition.
and ask questions about the 2.206 petition process. However, as discussed in the opening, the purpose is to provide information that helps the board render a decision, not necessarily on the merits or agreement with the decision-making so far. Mr. Blanch and Mr. Kuprewicz, with that being said, I'll turn it over to you to provide additional information you believe the PRB should consider as part of this decision. Thank you very much.

MR. BLANCH: Okay, thank you. This is Paul Blanch. Can you hear me?

CHAIR MILLER: Yes, we can, very clear.

MR. BLANCH: I believe that you made a statement at the beginning relative to Management Directive 8.11 that said I'm not allowed to ask questions. Is that an accurate portrayal of your statement?

MR. PICKETT: The purpose of today's meeting, according to the Management Directive, is for you to comment on the initial recommendation of the PRB, --

(Telephonic interference.)

-- petition, and to provide additional information.

MR. BLANCH: I'm not sure I heard an
answer to my question. Am I allowed to have a
dialogue and ask questions and receive answers from
the NRC?

MR. PICKETT: No, you are not.

MR. BLANCH: And could you tell me where
in 8.11 it says that?

MR. PICKETT: It doesn't say that in as
many words, but it's clear the purpose of the meeting
is for you to provide additional information in
support of your position.

MR. BLANCH: Again, this is a primary
point. The Management Directive says the NRC can ask
questions, the Licensee can ask questions, but it
does not preclude --

(Telephonic interference.)

-- I guess what I'm hearing is I'm not
allowed to ask any questions of a regulator who
supposedly serves the public and the environment.

CHAIR MILLER: This is Chris Miller, Mr.
Blanch. I think what you're hearing is we're trying
to have an efficient process here. What we're trying
to do is get through and hear the additional
information that the Board has to consider. If you
have clarifying questions to say, "I'm not really
sure what you meant by in your decision to date," or
whatever, and that helps, and then you say, "Here's my information related to that," that might be useful.

We don't have the purpose of this meeting to have a dialogue on whether or not, for example, a particular calculation is accurate or not, but if you want to provide more and say, "I didn't understand how you got to that assumption. Let me tell you what my take on the calculation is. I'd like you to look at this," that would be useful. I think if we stray from that too far, we're not going to get through your additional information for the Board to consider.

MR. BLANCH: I respectfully disagree, and there are some absolutely vital questions that I need responses to to determine whether Entergy is making accurate statements, and whether the NRC is making accurate statements. There's a question I tried to ask before. Could you tell me who from OI, Office of Investigation, is there, and who from the Inspector General's office is there?

MR. THOMPSON: This is Will Thompson from the Office of Investigations.

MR. BLANCH: Thanks, Will.

MS. SPICHER: And Terri Spicher from IG.
MR. BLANCH: Hi, Terri. Nice to talk to you again. My understanding is I cannot ask any questions. Is that a good portrayal?

CHAIR MILLER: I think you just asked some questions. As they help you provide us information, and we'll ask you if we need clarifying information, but the purpose of the call is for you to give us information, so that we have more to make our decision on.

MR. BLANCH: This is why I wanted a dialogue. Let me just -- Rick, I'll introduce you in one second, if you can bear with me.

MR. KUPREWICZ: No problem.

MR. BLANCH: Here's my first statement, ladies and gentlemen. My petition alleged that Entergy provided inaccurate and incomplete information to the NRC. Not only was the information provided inaccurate, it was materially false with respect to the three-minute closure time. Material in that first place approval of the AIM [Algonquin Incremental Market] project on this false information supplied by Entergy and its consultants.

This alone should be a firm basis for granting my petition. These facts are discussed in the NRC's internal email dated April 27, 2015. The
NRC, in defense of Entergy, recalculated the impact of prolonged gas discharge by modifying its equations for the PIR [potential impact radius]. This is the second time Entergy has been exposed for making false statements to a regulatory agency.

I have further follow-up questions on that. My second statement, and then Rick can take over. The NRC has threatened the safety of more than 20 million residents and the infrastructure of the greater New York metropolitan area, and is risking trillions of dollars of damage, and possibly the U.S. economy, by basing its safety assessment on a calculation that was recently obtained from the NRC under FOIA. This new information confirms that this NRC "calculation", which was partially handwritten, unapproved, undated, unsigned, used fictitious, false, and unsupported assumptions. This NRC calculation supported the FERC [Federal Energy Regulatory Commission] approval of the AIM project in the transportation of thousands of pounds of TNT equivalent across and in the vicinity of the nuclear power plant.

This back-of-the-envelope calculation -- as I say, handwritten -- which misled congressional representatives, misled FERC, and that
misled the general public, must be invalidated, and
an independent, transparent, structured risk
assessment, as outlined in OSHA [Occupational Safety
and Health Administration] 29 CFR, methodology must
be undertaken. With that, I will -- I have a long,
long list of questions which the NRC won't respond
to, and I'm going to turn it over to Mr. Kuprewicz.

Rick.

MR. KUPREWICZ: Thank you. You can't
see me, and I can't see you, so that may sometimes
cause for pauses in our discussion while someone's
trying to transcribe here. I'm going to focus my
comments on the analysis related to the gas
transmission pipeline rupture and the possible
resulting impact associated with that. I want to
first say that I'm going to honor the CEII [critical
energy infrastructure information] non-disclosure
agreement I signed under the FERC providence, so
please, all parties, respect my obligation to not
disclose certain critical energy information covered
by these agreements. Those agreements, however, I
must state categorically, do not prevent me from
commenting on information readily in the public
domain. Based on that and information that I studied
that is public, my filing observations regarding the
analysis concerning the 42-inch gas pipeline rupture
in proximity or close proximity to the Indian Point
nuclear power plant are as follows.

I reviewed a series of rupture analysis
statements concerning the AIM 42-inch transient
pipeline rupture near the Indian Point plant. These
analyses include the most recent FOIA study that Paul
just recently mentioned. I've got to come to the
conclusion that they do not represent the transient
dynamics associated with a 42-inch gas transmission
rupture should it fail near the Indian Point nuke
plant.

For example, based on extensive
experience, pipe fracture mechanics will demonstrate
that gas transmission pipeline ruptures are always
full-bore ruptures, even buried. Pressure drop will
not be a timely indicator of pipe rupture, even for
a 42-inch pipeline. Assumptions about closure within
three minutes to cut off gas flow near the plant are
unrealistic and unscientific. A further recent
analysis conclusion that a rupture release of one
hour on the 42 inch pipeline does not impact the nuke
plant needs further explanations, as it makes no
sense for this system. The above key assumptions,
as stated in agency studies, ignore proximity to a
compressor station upstream and ignore system
dynamics associated with a gas transmission pipeline
rupture that increases gas releases well above
pipeline flow before the rupture.

Quite simply, agency studies are
violating the basic laws of science concerning gas
pipeline rupture and associated forces that result in
massive cratering, pipe shrapneling, and violate the
science associated with such releases, especially a
42-inch pipeline. It is not that hard to set up a
base case for transient rupture analysis near the
nuke facility for this gas transmission system.

It appears that various agencies are
attempting to dismiss risk as low when gas pipeline
rupture may drive the nuke facility to non-safe
shutdown in a highly sensitive area. Agency studies
create the appearance of risk management tampering to
favor a project agency decision and raise the
question, Are involved agencies capable of performing
a scientifically neutral study for such a sensitive
issue? This just isn't that hard near the plant.

Lastly, I must comment that a truly independent
safety analysis should be performed, subject to a
reasonable open peer review. Security claims should
not be permitted to shelter malfeasance in a
scientific method involving incomplete risk analysis
for such a highly sensitive infrastructure. Again,
I thank you for your patience in introducing my
comments today.

MR. BLANCH: This is Paul Blanch. Rick,
thank you so much for your valued statements. Just
following up, Rick has considerable experience in
pipeline dynamics, pipeline explosions,
investigations, national transportation board, all
kinds of credentials. The Nuclear Regulatory
Commission has no one whose name I have seen that has
any credentials, published documentation, national
committees, related to gas dynamics and pipeline
transportation.

We know that a Mr. Tammara did a
paperwork study on Calvert Cliffs, Cove Point, but
this was a study, no real experience. Entergy's
consultant, Mr. David Allen, conducted a paperwork
study, no documented experience. The NRC has
considerable expertise in nuclear safety; however,
has no expertise in gas line investigations,
ruptures, dynamics, and response times and emergency
response to such. Given a vote, I would put my money
on Mr. Kuprewicz's opinions, rather than the opinions
of a paid consultant by Entergy, who was told to come
up with an outcome, and from a consultant or from an engineer with Entergy, who used to work for another contractor, who has no documented experience on pipeline dynamics.

We have a significant risk here, and we desperately need an independent risk assessment, using established OSHA procedures. I have 20 questions. Is it even worth discussing the questions, or are you just going to say, "No comment"? I will be submitting these questions to the NRC in writing anyway, but I expect some type of non-answer to the questions, as has happened before.

MR. PICKETT: Paul, this is Doug Pickett here. I would appreciate you sending those questions to me.

MR. BLANCH: Okay, I am going to ask the questions. My first question is what justification does the NRC have for modifying the equation for the distance in Reg Guide 1.97 by throwing in a factor that is undefined?

CHAIR MILLER: Paul, this is Chris Miller. Those kinds of questions we don't necessarily have the people here to discuss it or to weigh in to the merits of it. I don't think that's going to get us through the commentary -- or the
questioning and information period. I think it might be more productive if we ask the questions of what is represented so that we can get more information based on what, for example, Mr. Kuprewicz said and what you said. But yes, that question wouldn't be one that we'd entertain in this forum.

MR. BLANCH: Okay, according to the NRC, we, the public, are your customers. As a customer, if I go into a store or go to buy something, or an auto dealer, if I want to ask a question, I expect an answer. Again, I have 20-some questions. Do you want me to read off -- I'll just read off the questions. If you think they --

CHAIR MILLER: What would be useful is if you would send those questions in to us (Simultaneous speaking).

MR. BLANCH: I'd like to read the questions.

CHAIR MILLER: (Simultaneous speaking) with the right people, so that the right people could get the answers. Then you could get accurate answers to your questions.

MR. BLANCH: I'd like to ask the questions, such as the members of the public can hear what my concerns are with respect to nuclear safety.
If you choose to answer them, fine. If you choose to ignore them, let us know. No. 1, NRC's conclusions on isolation times and blast radius are contradicted by its own document references and historical experience documents by the National Transportation Safety Board.

The NRC has ignored the requirements of 10 CFR 192.935 for risk analysis. The NRC and Entergy have misrepresented closure times -- what I'm talking about, from the time of the accident to the time the gas flow terminates. This is a major, major concern stated in a proposed rejection letter. The NRC has totally relinquished its exclusive responsibility for nuclear safety to the Department of Transportation.

How can they do that? The Atomic Energy Act forbids that. For example, they trust the Department of Transportation to ensure those valves will close, that there's proper redundancy, that the condition of the 63-year-old pipe is not degraded, such that it's going to rupture within the next year or next day. We just don't know. I don't think the NRC knows. So in essence, the NRC has turned over its responsibility for nuclear safety and protecting the public to the Department of Transportation, and
we know the recent history of the Department of Transportation. A gas line rupture in one of Spectra's pipelines in Arkansas, crossing the Arkansas River, recently required more than 24 hours to detect, which totally contradicts the reference by the NRC to Spectra's Resource Report No. 11.

The NRC employed unauthorized computer programs to calculate risk, flow, vapor gas explosion, jet fire explosion. They used ALOHA, which is prohibited for the use in this type of event. The NRC, and I'm referring to Reg Guide 1.91, has changed and misused its own calculations. Calculations have been conducted by inexperienced NRC and Entergy persons. The NRC failed to consider historic ruptures in its time to isolate and terminate gas flow.

The NRC continues to ignore the potential impact of vapor clouds. The NRC fails to consider the possibility of flammable gasses entering the plant and control rooms, the same type of events that contributed to the explosions of the secondary containment at Fukushima. Whether that's a possibility or not, I'm not sure. I'm just saying it was not considered. The NRC provides misleading responses to direct questions on the content of a
fuel oil tank. That's a significant issue. I've asked three times, from Neal Sheehan to Doug Pickett to Scott [Stewart], senior resident inspector, do those large, multi-million-gallon tanks contain any flammable materials which are inside the impact zone? All I get is statements, "To the best of my knowledge, we don't think so."

I cannot get a definitive answer whether those large multi-million-gallon tanks contain flammable material? No direct answer. Spectra proposes to enhance new pipelines while ignoring 63-year-old existing pipelines within the Indian Point property. Neither the Licensee, nor the NRC as Indian Point operations -- personnel are not aware or have any procedure to combat and -- yes, combat and impose any requirements on the piping or the gas transmission line system within the protected -- I shouldn't say protected area, but owner-controlled area of Indian Point.

The NRC refused to issue an informal letter to me proposing to reject my petition. The NRC issued to the Licensee and the world a letter specifically addressed to me, dated June 29, 2015, but for some reason -- and this still holds true today, unless it's in the mail -- the NRC has ignored
even sending that letter to me. I got it from a friend. What kind of game is the NRC playing here that they won't sign letters, they'll address letters to me, but they won't send them either by email or by snail mail? My bottom line is we desperately need congressional and public support and demand the NRC sanction or require an independent -- and I do mean independent -- risk assessment of the gas line at Indian Point. I think those are the majority of the questions. There could be more.

MR. BEASLEY: Mr. Blanch, this is Ben Beasley of the NRC. It would be very helpful for us, when you send us your questions, that you send as much specific information as you can. I didn't take a lot of notes, but on things like you identified contradictions at that point, 191. If you could give us some specific information on where you see the contradictions, that would be very helpful for us to give you a fuller response.

MR. BLANCH: I sent that information to Doug Pickett today. It outlines exactly the equation that for some reason the NRC decided to modify to get its desired outcome.

MR. BEASLEY: Okay, thank you.

MR. BLANCH: Without any justification,
MR. BEASLEY: Thank you. The request was the more information you give us, the better we'll be able to give you a faster response.

MR. BLANCH: I'm just talking about your own documents, not my documents. You've got them all. Take a look at all the FOIAs that I filed and the responses to the FOIAs. Some of them are different. I haven't seen any communication where the Federal Energy Regulatory Commission has even given you any flow diagrams to perform an independent risk assessment of the pipeline system. We don't know what valves have to be closed, whether there are multiple valves. I assume there have to be multiple valves. We, in the nuclear industry, require redundancy. We require inspections. We require quality assurance. How can you delegate this responsibility to the Department of Transportation and rely on them to protect the health and safety of millions of residents? This is inexcusable to me.

CHAIR MILLER: Okay, Mr. Blanch, we have those questions and statements that you just provided. Is there other material you want to provide the Board? I know that there's some questions that the Board would want to ask you and
Mr. Kuprewicz, but before we do that, I wanted to see if there's any other information that you have, that you'd like to provide?

MR. BLANCH: That's the primary information that I have, but I'd like to have you ladies and gentlemen ask Mr. Kuprewicz, with his numerous years of recognized gas line investigations and studies -- if you have any questions for him.

CHAIR MILLER: We will do that. If I could just ask you one question related -- this is Chris Miller. I want to ask you one question related to your -- in your list of questions and statements about your June 29th letter. Do you want us to send you an email -- I'm assuming that the hard copy did not come to you. Would you like an email of the -- with an attachment of that letter? We can provide that?

MR. BLANCH: No, I don't need it. I obviously got it from a friend. It's just very upsetting to me that you have a signed letter, dated letter, and I'll give you the benefit of the doubt that maybe it was a mistake, but given all the other evasive statements I've received from the NRC, it just seems to be a pattern. That question about do the tanks contain flammable material, I can't get a
straight answer from the NRC. When I get an answer,
to the best of my knowledge. I'm not a politician.
I'm an engineer. I don't take kindly to political
answers. This is from your Office of Public Affairs.
I really, really -- I've said it 100 times.
Everyone's saying it. We need an independent risk
assessment. We need to sit down.

I've asked Senator Gillibrand's office to see if her office could arrange a meeting between myself and Entergy to try to resolve our differences of opinion. I haven't heard back yet. I don't have any questions. I'd certainly like answers sometime.
I could restate these questions, but I read them as I had written them. They were very brief. I'm pretty much done. I'm not overly pleased at what I'm hearing, especially on the question answering.

CHAIR MILLER: On that one issue with the letter, we'll go ahead and send an attached letter, assuming that's the mail that hasn't arrived there yet or something. I don't know what happened. It certainly was inadvertent. If the June 29th letter didn't arrive by July 14th, I don't know what happened, but we'll send you an electronic version. You should be able to get that shortly.

(Simultaneous speaking.)
CHAIR MILLER: If you had any more -- before we go on to Mr. Kuprewicz -- and I'll ask the rest of the team -- you made an initial statement about false statements that were made to -- fictitious false assumptions. I'm wondering is that something that we can get from you the specifics of that, or is that something you can provide us when you provide your list of questions, or is that something that Mr. Kuprewicz can provide your beliefs on those? That would help us out a lot, as well.

MR. BLANCH: I had, last Friday, a very long conversation, very cordial and professional conversation with Mr. Art Burritt, who I think is a senior NRC person on here. I think we will both agree it was a very good conversation. We got into some of these questions last week about probability assumptions and the basis for that.

Again, I told Mr. Burritt last week that there were errors where Indian Point is operating outside of their design basis with respect to the existing gas lines because your gas expert said that a failure of these 63-year-old gas lines is not feasible, which is, to me, a false statement. That's one example. There's many examples throughout these
documentations that I got within FOIA. Another false
statement is that the gas rupture, if it pursues,
will not significantly increase the blast radius,
inconsistent with the equation in Reg Guide 1.91. I
don't know how one comes to that and how one can make
these statements that, on the surface, appear to be
inaccurate and false.

CHAIR MILLER: Okay, I've got those two
listed. If you have any more, it would be useful if
you provide them with the other questions you're
providing. That would be useful to us.

MR. BLANCH: I've got 100 people in the
room here. With respect to that June 29th letter,
don't bother sending it. I have it obviously. I've
gotten it from numerous people. I don't care. It's
just an example of how the NRC is treating us and
ignoring us and not giving us direct answers to direct
questions and not signing documents, not dating
documents. It seems like they're almost playing a
game with me, and nuclear safety is not a game to me.

CHAIR MILLER: It's not a game with us
either, and we have a very thorough process for
putting things in our ADAMS [Agencywide Documents
Access and Management System] system, so they're made
publicly available. I take concern when somebody
says that something is not appropriately sent or documented or whatever, so we'll make sure you get another copy of that letter, and that the information is available when it's able to be put in the public space.

MR. BLANCH: I tend to disagree with you that you have procedures in place to assure safety when the NRC doesn't even have a procedure for doing safety-related calculations and does not have a quality assurance procedure that it imposes on licensees. When I see a calculation, which I call a back-of-the-envelope calculation, with handwriting in it, I would be put in jail if I submitted that to the NRC if I were working for a licensee. I disagree with your statement that we are concerned about safety. I believe more concerned about the continuance of the nuclear industry. I'm done.

CHAIR MILLER: Thank you. Let me ask the Board, is there any more questions for Mr. Blanch before we move on to questions for Mr. Kuprewicz? No? Okay, anything from the regional people or other headquarters people that want to ask a question of Mr. Blanch?

PARTICIPANT: No thank you, Chris.

CHAIR MILLER: Okay, we'll move on to
questions for Mr. Kuprewicz.

MR. BEASLEY: I did have one. This is Ben Beasley. Mr. Kuprewicz, you said that it makes no sense that a release from the gas lines -- release and explosion would not affect the plant. I just was curious if you have some test data or some examples of where there was a blast and how far the one psi pressure wave extended from that blast? If you have some data like that that you could send to us that would be informative, it would be helpful just to back up your statement that it makes no sense there.

MR. KUPREWICZ: Let me clarify here. What I think I said -- maybe I'll have to go back and look at the transcript -- is that the analysis had indicated that a one-hour gas release is just going to be as effective as the early gas release. That makes no sense because the mass releases are substantially different. As to whether or not it affects the plant, I don't know that. That's an issue -- and I want everybody to be clearly understood -- I can't make that analysis because I don't know the details of the plant.

All I can tell you is the statements I'm hearing and reading in the analysis and studies related to gas pipeline rupture, on a 42-inch
pipeline that ruptures at this point, in this proximity to the nuke facility, has no justification in the scientific method. There's the difference. What I would clarify is you need to get a hold of somebody who really understands gas transmission pipeline rupture. They can do a transient analysis -- okay, the pipeline ruptured at Second 0. It's now Minute 2, Minute 3, Minute 4, Minute 60. This is a mass release, and you need to decide when does it -- will it ignite or not? Will it detonate or not? Then assign probabilities to those, if you wish.

But regardless of the probability, if you have a significant, large enough gas release, and it does detonate, will it affect the plant, and more importantly, not so much affect the plant, but will it affect the plant's ability to shut down in a failsafe mode? That's always been the question I've had. I'm not trying to answer that. Am I clear?

MR. BEASLEY: Yes, I guess I was just interested -- the way you said it, I thought you might have some specific information about a blast radius that was larger than was calculated by our analysis, but it sounds like you don't have anything specific.

MR. KUPREWICZ: No, you're correct. My
analysis, based on what I see of the plant structures -- again, I'm not the detailed expert on your structures at Indian Point -- is my suspicion would be while blast radius would do a lot of damage, it may not affect the plant's ability to failsafe shutdown. Blast is probably not the controlling factor in this analysis. It's heat radiation.

MR. BEASLEY: Yes, our analysis did calculate the heat flux, also. Again, I just was interested if you had something specific that you were thinking about.

MR. KUPREWICZ: No. To be fair to you, I would have to do a specific calculation for a specific site, and I have not done that, just looking at the general maps. I haven't reached that conclusion. My suspicion would be -- your nuclear reactors, they'll survive blast, no big deal, but it's the auxiliary failsafe equipment that you have to be sure someone's performed an analysis on. My experience would tell me most likely heat radiation is your biggest risk.

MR. BEASLEY: Okay, thank you.

CHAIR MILLER: Yes, appreciate that.

MR. PICKETT: This is Doug Pickett and I'd like to ask Mr. Blanch if you could provide as
much detail in your concerns, that would be
appreciate, of course. One thing I wrote down that
you said --

MR. BLANCH: Could you speak up a little
louder please?

MR. PICKETT: Okay, I was asking Mr.
Kuprewicz if he could provide as much detail as you
could on the individual concerns that he mentioned in
his statement. That would be beneficial to the
Board. One of the things I wrote down for Mr.
Kuprewicz, I wrote down risk management tampering.
That certainly sounds like an impropriety by the
staff, if you could talk a little bit more about that.

MR. KUPREWICZ: That's a general
observation I've seen in too many criminal
investigations lately that I've had to assist in. I
don't like using that word in public very often, nor
am I implying that's the situation here. But we tend
to find, in the application of risk management
techniques, which have become a more favorable effort
in regulatory processes, that sometimes we see
processes where the science is either ignored or not
applied appropriately, such that it drives to a
pre-ordained conclusion.

So I make that statement with my
impression is -- I get the impression that someone's
driving towards a decision to site the facility. I
can't reach that conclusion, whether that's fair or
not. All I can look at is the scientific principles
related to gas pipeline ruptures and say holy crying
out loud, they're not capturing the scientific
principles here. Again, these are transient
releases. They're a little more complex, but they're
not that hard to do if someone knows what they're
doing.

MR. PICKETT: Okay, thank you.

MR. BLANCH: This is Paul Blanch again.

Another one of the documents that I got under FOIA
actually shocked me when it said that there's 376,000
kilograms of natural gas released during the first
minute, and then a couple hundred thousand for the
next hour. That's a phenomenal amount of gas. When
I look at 376,000 kilograms of gas in a minute, that's
close to a nuclear weapon. Within about three
minutes, the energy released would be close to that
of a nuclear weapon.

Natural gas on a per-pound or
per-kilogram basis contains ten times more energy
than TNT. We're not talking about a small break
here, with a small amount of energy being released.
This is not -- and I realize that TNT versus natural gas is quite a bit different because of the time involved, but we're not talking a small amount of gas. This is a very serious safety issue. If the NRC wants to reject my position and think this is the end of it, it will not be the end of it. I'm done.

CHAIR MILLER: Thank you. Hang on one second. Let me just -- one more question for Mr. Kuprewicz. This is Chris Miller with the NRC. You looked at our analysis, and I realize you didn't do -- calculate the blast radius and that and the heat flux that came -- similar to what we did. My question was I thought I heard in your discussion that you did question the amount of gas that we -- the gas flow that we used in our calculation.

I was wondering if you had any numbers that you used, or you think were more appropriate than the numbers we used to calculate the gas flow that leads to the mass -- the kilograms and the energy potential that we're talking about here?

MR. KUPREWICZ: To answer your question, the answer is no, but based on a wealth of investigation and other calculations on other pipelines, I've got to tell you a 42-inch, when it ruptures, is going to release -- I'm not going to
jump to Paul's numbers, but there are going to be a
lot of numbers. They're going to be big numbers.
When I hear things like we can cut off the gas flow
within three minutes, that's clearly a violation of
the laws of thermodynamics. Even if you close the
valves within three minutes, it's not going to cut
off the gas flow. But, and that -- my experience
would say this: the credibility tends to go out the
window when I start seeing statements on key
assumptions, and it just may kind of get back to that
earlier question that was raised, where gee, it looks
like these are kind of lining up to give a
pre-ordained answer. Look, just run the transient
analysis, make your statements for what they are, and
then let them be what they are. Then they'll take
you where you need to be.

You're going to find that a 42-inch gas
line is going to release a lot of gas for a long time,
and you won't -- by the time you see pressure drop,
the damage is already done. It won't be a few
minutes. That's just a qualification statement.
The details -- run a transient analysis on a 42-inch
gas pipeline rupture a few miles from a gas
compression station. They're not going to see
pressure drop, not for a while.
CHAIR MILLER: So we did do the numbers on the flow. I hear you think they may not be accurate (Simultaneous speaking).

MR. KUPREWICZ: I'm not here to punish you guys or challenge everything you guys do or make you the bad guys. My function is to be neutral. I'm just saying this. If your calculations didn't look at gas flow going up significantly in the first couple minutes after a pipeline rupture, your approach is probably in error.

CHAIR MILLER: Okay, thank you for that. Any other questions for Mr. Kuprewicz? Any more questions from the region or from other headquarters offices?

MR. BEASLEY: No, Chris, thank you.

CHAIR MILLER: Is there any questions from the pipeline -- from Entergy, let's put it that way?

MR. WALPOLE: No comments from Entergy, Chris.

CHAIR MILLER: Okay. We know that there are members -- that's all that we have for the questions back and forth for the Board, the information the Board would need. We know that there are members of the public invited. I guess I would
like to include them by saying, are there any members of the public that would like to make a comment or question regarding the process we're using? If you do, again, I'll remind you, back to the beginning, that you need to press star-1, so that the moderator can get you off of mute and into the call. Let's go to that portion of our meeting.

MR. BLANCH: I have Linda Puglisi, who's the town supervisor for the Town of Cortlandt, who would like to ask another question. Linda, thank you.

MS. PUGLISI: Thank you so much for allowing me to make a statement, and I want to ask a question. I'm the supervisor of the Town of Cortlandt, and Indian Point has been in our town and our Village of Buchanan. The mayor of Buchanan is also here. We've been partnering for two and a half years to fight this Spectra-Algonquin expanded pipeline, from 26 inches to 42 inches, and even more importantly, a point to make, it's a 25 percent increase in pressure.

A couple of months ago, there was a fire at a transformer on the Indian Point grounds. I received a phone call on a Saturday night regarding that incident. If this pipeline, 100 feet from...
Indian Point, was under construction or constructed, God forbid that there was an impact to that gas line. Bottom line here, I will be very simple and clear in my comment and my request. We need your help, NRC, to go to FERC, Federal Energy Regulatory Commission, that has the authority to render a decision on the expanse of this pipeline, and unfortunately they did on March 3, 2015. We got together with State, with our task force, with our assemblywoman, Sandy Galef, with many other people in our community and elected officials, and we asked for -- to revisit this, and to hear our many, many concerns and issues. This is one of the most important issues, the close proximity to Indian Point. We need your help to go to FERC to ask them to re-open that premature decision that they made on March 3rd. Please help us. Thank you.

(Simultaneous speaking.)

CHAIR MILLER: Paul, do you have other folks?

MR. BLANCH: Is there anyone else that would like to make a brief statement to the Nuclear Regulatory Commission? I hate to single people out. There's one lady that would like to make a statement. I'll let her do her own introduction.
MAYOR KNICKERBOCKER: Thank you for taking this call. Thank you Paul Blanch. Thank you Sandy Galef. Thank you Linda Puglisi. Thank you everyone in this room. You can hear the questions. We need answers. Oh, I'm Theresa Knickerbocker, mayor of Village of Buchanan. Can you hear me? Hello?

CHAIR MILLER: Yes, we can hear you.

MAYOR KNICKERBOCKER: Okay, good, just wanted to check. There's a bunch of people in this room. You can hear the concern. I believe Mr. Blanch had a lot of good questions, a lot of good questions, also Dave had excellent questions and comments. We have concerns. We want this to be safe. This is our community. We have to have answers to these questions. I would really, really appreciate -- this is very difficult, this phone calling thing. I'm more of a person one on one. I need to communicate directly.

I would really like to ask that when you answer these questions that you come into our community to answer these questions. If you want me to facilitate it at the Village of Buchanan, or I'm sure that Supervisor Puglisi would love to do it in the Town of Cortlandt, but we really need to have
these questions answered. We need to be assured that this pipeline is safe.

We have a nuclear power plant. You guys are in charge of making sure these nuclear power plants are safe, so please, please answer these questions, get answers to these questions, get back to this community and assure us that this is safe.

Thank you.

MR. BLANCH: Okay at this time, we've probably run over a little bit of time, but I appreciate everyone's concern here and at the NRC. I think we've accomplished what we needed to accomplish during this conversation. Again, the bottom line is we still have a lot of questions about nuclear safety, and we desperately need that risk assessment. With that, I'm going to end mine, unless the NRC has something they want to finally say.

CHAIR MILLER: Yes, just a couple of quick points. First of all, thank you to the commenters who just presented and to Mr. Kuprewicz and to you, Mr. Blanch. Appreciate the discussion and the information. We will make a Board decision on whether to accept or reject the 2.206 petition and to further discuss, and we'll provide information, and we'll provide answers back, and we'll provide the
court reporting of this -- transcripts of this call.

With that in mind, let me ask the court reporter if there's any additional need for information for the meeting transcript? You may have to do *1, court reporter.

MS. SHAPIRO: Hi, this is Geri Shapiro from Senator Gillibrand's office. -- give me some kind of a time line, in terms of now that you've heard the questions raised, when they will be answered --

(Telephonic interference.)

-- time line. The other two is several elected offices on this phone call. We would like to be able to get copies of the responses, so that we can get the material directly, also.

CHAIR MILLER: Thank you. This is Chris Miller. We certainly will provide that information if you can identify the other offices that are on

(Simultaneous speaking).

MS. SHAPIRO: I would tell you to send them to the entire congressional delegation. I don't know whether they're all on or not. I know we have two of us on from Senator Gillibrand's office. I know that Congresswoman Lowey's office is on. The thing is I guess I wanted the time line and equally important, what do you see as the time line here?
MR. PICKETT: This is Doug Pickett. We need to see the questions from Mr. Blanch and Mr. Kuprewicz. I really can't give you a good estimate right now. We'll have to have an internal meeting with PRB after this, I think in the next few weeks. Then we're going to have to discuss what the time and the questions are. We're probably talking a good six weeks.

CHAIR MILLER: This is Chris Miller. The process, as Doug was laying it out, we have a couple other things that we have to get. When we get the questions from Mr. Blanch and additional information that we need to consider, then we'll -- and we need to get the transcribed report. We'll get the transcribed report out to all parties, and that includes the Board members. Then we'll meet as a Board. I would expect that's going to be two to three weeks out, if not more. Then the Board will make a recommendation. And there's two ways that could go. the Board could say we should accept this petition and look at the merits of it and do further information, or the Board could say there's no additional information than what was already provided, and then we provide a final report on that. But yes, we can't give you an exact time line, but
it's a number of weeks out.

MS. SHAPIRO: Thank you.

MS. WARREN: Good afternoon. My name is Barbara Warren. I'm with Citizens' Environmental Coalition. I guess I'd like to understand did NRC just accept the Entergy evaluation, or did you do an independent evaluation yourselves? Also, did you include real-world information, such as the experience that happened in San Bruno, California with the exploding pipeline?

MR. BEASLEY: This is Ben Beasley. Yes, ma'am, we did a confirmatory analysis. We did our own analysis. We did not just accept the Entergy numbers. That is our practice. When a licensee sends us information, we confirm it. So we did do a complete confirmatory analysis.

CHAIR MILLER: This is Chris Miller, and I'll add on to that. In Region 1, you can let me know if you have additional, but what our part in the process for this pipeline is, the NRC part, is to evaluate the Licensee's calculations for whether there's any impact to equipment that's relied upon to safely shut down the plant. They do what is called a 50.59 evaluation. The Licensee did that evaluation. They weren't required to submit to us,
but we reviewed that in a separate inspection and
provided that input in an inspection report. I think
that inspection report was issued sometime in
November. Is that right, Region 1?

MR. SETZER: Yes, Chris. Hi, this is
Tom Setzer. November 7th, in the third-quarter
inspection report, that's the integrated report
that's the residents' right. That's probably
available in there. In a modification sample that
we did, we did document the inspection of what you
just discussed.

MS. WARREN: You did consider the San
Bruno situation in your evaluation, where they had
trouble finding the valve to shut off the gas?

MR. SETZER: No, ma'am, we didn't --

(Telephonic interference.)

-- specific event. The analysis we did
was a conservative analysis that assumes a release.
We did do two evaluations, the three-minute release,
but it wasn't just three minutes. It assumed a
three-minute closure, but the release was longer than
that. Then we did a one-hour release, so it was a
bounding analysis that we prepared.

MR. MCCOPPIN: This is Mike McCoppin.

In addition, we also had an independent
MR. BLANCH: Okay, this is Paul Blanch again. I'd just like to make a couple more statements. The intent of my petition was not to take a --

I think I've made a fairly convincing argument, supported by the NRC documents, that inaccurate, incomplete information was sent to the NRC on a couple of occasions because I believe that to be the case. I think that FERC needs to be informed by the NRC that the NRC's analysis may have been faulty. I would like to know if the NRC will contact FERC and say there's a question related to our analysis, or is it a foregone conclusion the pipeline's going to go ahead?

CHAIR MILLER: Yes, this is Chris Miller. Mr. Blanch, the question I believe you have is are we
going to contact FERC and tell them that they need to reverse their decision? Is that an accurate restatement?

MR. BLANCH: That's pretty accurate.

CHAIR MILLER: That's going to be up to what the Board determines once they evaluate the additional information that's provided --

MR. BLANCH: This could be a year from now?

CHAIR MILLER: That's not our time line. That's not our scheduled time line, but it will take some time.

MR. BLANCH: Paula Claire has one more question.

CHAIR MILLER: Okay.

MS. CLAIRE: Hi. My question is -- oh, Paula Claire. I'm a resident of Garrison, and also a co-founder of the Stop The Algonquin Pipeline Expansion. My question is you talk about the safe shutdown of Indian Point in the event of a pipeline rupture. I'm concerned about -- what about the containers of spent fuel that are stored there? Are you also considering that as a part of the safe shutdown of the nuclear facility? Because they're highly radioactive. If a rupture occurred, it would
seem to me that they would be in jeopardy, especially the ones in the spent fuel pools, which are the majority. So that's my question.

MR. PICKETT: Hold on, we're going to pause for just for a second before we respond. This is Doug Pickett speaking. We just got a chance to talk to our reviewer. The residual location is the entity -- the spent fuel storage canisters. They are rather far away from the pipeline. We have drawings in front of us, and we looked at where we anticipate the one-pound over pressure and the critical heat flux to occur, and it would not approach the entity's canisters. We do not believe it would impact the spent fuel pool -- spent fuel storage facility at all.

MS. CLAIRE: If it affected the switch yard, that affects the cooling of the spent fuel pools.

MR. PICKETT: The idea is that the switch yard, if that were taken out, there are emergency diesel generators on site to provide you on-site emergency AC power. That will supply you the cooling to the spent fuel pools.

MS. CLAIRE: Okay, so are you saying that the spent fuel would be safe in the event of a
rupture?

MR. PICKETT: That is correct. That's assuming you lose the switch yard, and you would lose off-site power, but it has emergency on-site AC power supplies, in the way of diesel generators, to supply you the critical cooling that you would need for the spent fuel pools.

MS. CLAIRE: What about the heat blast that Rick Kuprewicz had mentioned? Wouldn't that be a factor?

CHAIR MILLER: This is Chris Miller. The NRC did a look, and I've got the reviewer sitting here with me, so pipe up if I say the wrong thing, but we did a look a couple of times by different people looking at two key things. One is the blast and the pressure wave from any expected blast. That was done by a computer modeling program that we use, and we have used it for our nuclear facility. We've used it for the new reactors that are being built. We used this model to predict gas explosions and heat flux. That model was run and found that it did not affect these related structures needed to cool the reactor itself or the fuel in the spent fuel pools. That was the pressure wave. For the heat flux, the same thing. We could determine those calculations...
using that computer model that was run on several
different occasions found that the heat flux would
not be a factor to damage those safety-related
components.

MS. CLAIRE: I think I would like to see
the analysis that was done to address the spent pools
in the event of a rupture. Thank you.

MR. PORRECO: Hi. Good afternoon, this
is Tony Porreco. I'm the court reporter. I have a
few questions for Mr. Pickett.

CHAIR MILLER: Go right ahead.

MR. PORRECO: Mr. Pickett, at the
conclusion of the hearing, would you be able to
provide me with a list of the about 20 NRC staff
members? I just was trying to get everyone's names.

MR. PICKETT: Sure, I just send it to
court reporters?

MR. PORRECO: Yes, can I provide you with
an email address?

MR. PICKETT: Sure.

MR. PORRECO: Sure. Okay, it's P, as in
Paul, O-R-R-E-C-O-A at gmail.com.

MR. PICKETT: That's C-O-R-R-E-C-O-L?

MR. PORRECO: E-C-O-A. A, as in apple,

and the first letter is P. P, as in Paul.
MR. PICKETT: P-O-R-R-E-C-O-A?

MR. PORRECO: Yep, at Gmail.

MR. PICKETT: Gmail, okay.

MR. PORRECO: Thanks.

CHAIR MILLER: At Gmail.

MR. PORRECO: Appreciate it.

MR. PICKETT: Okay, thank you.

MS. BORGIA: It's Catherine Borgia, Westchester County legislator representing parts of Peekskill and Cortlandt. My question is a positive question. Since you are doing this, actually, a little bit, by Mr. Shapiro and Mr. Blanch, I was thinking of this since you are doing a re-look, given today's questions, will there be any level of communication to FERC that this is happening, as they are considering the possible recertification?

MR. PICKETT: This is Doug Pickett speaking. We are going to have to look at the questions from Mr. Blanch and Mr. Kuprewicz. We're going to have an internal meeting of the Petition Review Board. We will determine whether or not we need to redo our analysis, and we will not be contacting FERC unless we determine that we have a problem with our own conclusions. So right now, we do not plan on communicating with FERC. We will not
do that until we make the determination that we are in error.

MR. BLANCH: Okay, we've got to end this, but I've gone one last question from a local resident who will introduce himself and ask the final question. Thank you.

MR. VAUGHEY: Yes, hello. My name is Vernard Vaughey, V, as in Victor, A-U-G-H-E-Y. My question hopefully is simple. Since it appears that the NRC will not send something to FERC to suspend the project, will the NRC consider, based upon all these questions and these unknowns, sending a request to FERC to not issue a notice to proceed for any of the work in Cortlandt until the NRC has their determination made, be it three weeks, three months, or three years?

CHAIR MILLER: This is Chris Miller. We're discussing -- I understand the gist of your question, and we're just discussing options of what we could do to discuss the situation with FERC so we could --

MR. KUPREWICZ: I don't mean to interrupt -- this is Rick Kuprewicz. I'm going to have to sign off because I've got another commitment. Paul, you'll fill me in later? Thank you.
MR. BLANCH: Thank you very much, Rick.

MR. VAUGHEY: There's no sense in starting the work on this if the NRC has questions. There is not one rationale for FERC to allow work to commence if there's a possibility of there being any changes or revisions. That's my reason for asking that the NRC request FERC not issue a notice to proceed on the work in Cortlandt.

CHAIR MILLER: This is Chris Miller. We talked about it, and what we can do -- I will share information that -- we haven't been sharing all the parts. We've had a lot of discussions with a lot of people in agencies, etcetera. We've been in communication with FERC a number of times through this process, including talking about the blast analysis that we did.

They're aware of the blast analysis that we conducted. We've had those conversations on various levels. What we will do is we will send a note or contact our contacts at FERC and let them know that there's a concern, based on Mr. Blanch's 2.206 petition. We'll take that action. We can't really request them to take additional action beyond that until we get more detail from our Board. That's what our plan is but we will let them know that this
is in progress.

MR. VAUGHEY: That letter will be public, at least our elected representatives will have access to it?

CHAIR MILLER: I'm not sure that we're going to send them a letter. We were planning on a call or an email to our representatives. Like I said, we've been talking at different levels to FERC throughout this process, so I'm confident that FERC knows that there is a petition, and that there is a blast analysis that's been done, that there've been calculations that have been done using the ALOHA code.

I can say that with confidence that we've had those discussions with them, but we were planning on a phone call and/or email, however we can send that information to them.

MR. BLANCH: Okay, we're all getting a little bit tired here. I appreciate your time, ladies and gentlemen. I'm not sure where we go from here. I'll just reiterate we need an independent risk assessment. Again, thank you for your time, and we look forward to hearing from you. From our end, that's the end of this particular discussion. Thank you.
CHAIR MILLER: Thank you, and for all those who participated, we appreciate it, and we look forward to receiving the additional information.

MR. BLANCH: Okay, thank you very much.

CHAIR MILLER: Thank you, bye bye.

(Whereupon, the above-entitled meeting went off the record at 4:04 p.m.)