RIVERKEEPER.
NY's clean water advocate

January 16, 2015

VIA ELECTRONIC MAIL
Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Algonquin Gas Transmission, LLC, Docket No. CP14-96-000
Call for an Independent Assessment of the Risk to Indian Point Energy Center
Associated with the Proposed AIM Gas Transmission Pipeline

Dear Secretary Bose,

Riverkeeper is concerned with the inadequacy of the Safety Evaluation submitted by Entergy in regards to the risk to Indian Point Energy Center (IPEC) from the proposed 42-inch Algonquin Incremental Market (AIM) pipeline. As described in the attached letter from Richard B. Kuprewicz of Accufacts, Inc, dated December 30th 2014 the risk assessment submitted by Entergy does not adequately account for the true transient dynamics associated with a gas transmission pipeline rupture.

Riverkeeper therefore joins the call for a truly independent and thorough risk assessment that fully evaluates the potential impacts of a gas transmission pipeline rupture on critical Indian Point failsafe infrastructure.

Sincerely,

Paul Gallay

Paul Gallay
President and Hudson Riverkeeper

Accufacts Inc.
"Clear Knowledge in the Over Information Age"

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December 30, 2014

To: Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Algonquin Gas Transmission, LLC*, Docket No. CP14-96-000
Concerns Related to Incomplete Risk Assessment Associated with the Proposed New AIM Project 42-inch Gas Transmission Pipeline in Proximity to the Indian Point Nuclear Plant Facilities

In an earlier submission to FERC on the above AIM Project Docket, Accufacts Inc. raised the concern related to the possible location of the new 42-inch gas transmission pipeline in proximity to the Indian Point Nuclear Power facilities ("IP").[1] Accufacts' findings, based on information disclosed by the risk assessment performed for IP included certain statements and assumptions that raised serious concerns to Accufacts, should the 42-inch gas pipeline rupture in proximity to IP. The risk assessment appears to not capture the true transient dynamics associated with a gas transmission pipeline rupture, especially as they apply to the Algonquin system post AIM at this location. Quite frankly, the risk assessment appears seriously incomplete, even dismissive, and provides little confidence as to its adequacy in this highly specialized area of expertise. Accufacts stated in its previous Report to FERC:

"The Entergy-submitted Safety Evaluation and Analysis for the Indian Point Nuclear Plant ("IPEC") concerning the risk associated with the 42-inch AIM pipeline is seriously deficient and inadequate."[2]

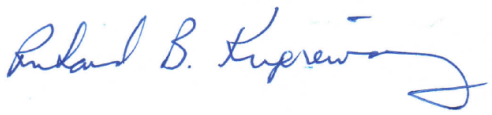
Since issuance of the Accufacts Report, additional information was provided to Accufacts by local officials who were told the information could be shared. This additional information was identified as a Resource Report 11, "Reliability and Safety," filed with FERC by Algonquin in February 2014 concerning the AIM Project and was reviewed by Accufacts. This additional information only served to raise further concerns that an independent, thorough, and experienced rupture transient analysis has not been performed for the 42-inch proposed pipeline in the vicinity of IP. Accufacts would advise, for example, that minimum federal pipeline safety

[1] FERC Docket CP14-96 Accession # 20141121-5078, filed by the Town of Cortlandt on 11/21/2014 containing a public redacted version and a full version (CEII protected) of the Accufacts Report ("Report"), dated 11/3/14, pp. 8-9.
[2] *Ibid.,* pp. 8 – 9

regulations do not adequately define the placement or operation of remote control shutoff valves in such a sensitive area. In addition, confusion related to the transient dynamics of gas pipeline rupture on this system can cause a response, even by well-meaning control center personnel, or the operation of even the best of intended remote control shutoff valves triggered by pressure loss, to be seriously delayed, considerably increasing the duration of very high heat flux energy releases associated with large diameter pipeline ruptures (such as the proposed 42-inch).

Accufacts has no idea at this time as to whether IP could safely endure a nearby 42-inch gas transmission pipeline rupture and failsafe shutdown, but based on very unclear information provided to date, a truly independent safety hazard analysis (such as a HAZOP) by those experienced in gas transmission pipeline rupture transients incorporating Algonquin system rupture dynamics in this pipeline segment, while evaluating critical IP failsafe infrastructure locations that might be affected is warranted.[3] Such an assessment needs to carefully consider the possibility of rupture failure linkage interactions with IP equipment that might drive IP to a catastrophic IP event.

Accufacts also appreciates the need for some sensitivity in restricting access to critical infrastructure information, some of extreme sensitivity that may be needed to perform such a thorough analysis. However, such secrecy should not be allowed to cloak inadequacies in risk assessments or assumptions. A mechanism similar to the CEII process should be able to be devised that would assure the public, especially concerned elected officials, that such risk assessments are truly representative of what could happen in a pipeline rupture at this highly sensitive location. A thorough and independent risk assessment that can be independently verified and communicated by local officials to the public is definitely needed and warranted in this matter.



Richard B. Kuprewicz
President
Accufacts Inc.

[3] HAZOP stands for Hazard and Operability Study, a structured and systemic examination of processes to minimize possible catastrophic failures.