

Testimony of Amy Rosmarin – Stop the Algonquin Pipeline Expansion
Peoples Hearing Investigating FERC Abuses of Law & Power
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My name is Amy Rosmarin. I'm a former Councilwoman in NY and a Co-founder of Stop the Algonquin Pipeline Expansion.

FERC will not rescind approval of the siting of the Algonquin pipelines at the Indian Point nuclear facility even though it is aware that pipelines sited there pose a unique national security risk that threatens the 20 million people within the 50-mile impact radius of the plant as well as the US economy. There are two existing pipelines at Indian Point and a massive new one, the AIM, being built there.

FERC is aware that pipeline and nuclear safety experts warn that a rupture in the AIM pipeline at Indian Point could result in a radioactive release greater than that at Fukushima rendering the region and likely NYC uninhabitable¹;

In the first few minutes of a rupture in the pipeline, the explosion would have the TNT equivalent of the bomb dropped on Hiroshima - followed by additional explosions.

FERC is aware that Indian Point is a key terrorist target and that pipelines are vulnerable to hacking as well as drones, physical access, and vehicular explosions.

A pipeline at Indian Point is an un-deployed weapon of mass destruction. However, FERC will not rescind its approval.

It is well known that even if Indian Point were to be shut down today, the gas pipelines would continue to pose a catastrophic risk for years due to the radioactive spent fuel rods in the spent fuel pools and potentially from the radioactive spent fuel stored in dry casks. It takes at least 5-8 years from the time the reactors are shut down until the spent fuel can be cooled enough and stored in dry casks.² Transferring to dry casks is likely to actually take longer given the extremely high cost and NRC position that "there is not a significant safety benefit to requiring full transfer to dry cask storage."³

FERC is aware that the pipelines are not adequately protected and that the mitigation measures for the AIM (burying it 2 feet deeper and adding concrete slabs above the pipe) have not been tested. According to Richard Kuprewicz, pipeline safety expert, these mitigation measures are

¹ Blanch Declaration https://drive.google.com/file/d/0B7g3zFc9C_r6Z3dKMVZSYnJjeGc/view

² <http://www.ucsusa.org/nuclear-power/nuclear-waste/safer-storage-of-spent-fuel#.WEC4x9UrKUK>

³ <http://www.homelandsecuritynewswire.com/dr20140602-nrc-will-not-require-nuclear-plants-to-transfer-waste-to-dry-cask-storage>

unlikely to offer protection. Kuprewicz further states, "I have yet to see a steel pipeline that cannot be damaged by third party threat activities."⁴

FERC's approval of the siting of the AIM at Indian Point was based on the statement from the NRC that it did not present a risk. Yet, FERC is aware that the required risk assessment⁵ of co-locating the pipeline with the Indian Point nuclear plant was not conducted.⁶

Moreover, FERC is aware that what the NRC presented as a risk assessment that deemed the siting safe violated its own policies and procedures, was based on false information, defies the laws of thermodynamics, was based on a modeling system, ALOHA, that is prohibited for a pipeline rupture in this configuration, has the incorrect shutdown time for the gas pipeline, incorrect blast radius, incorrect detonation capacity, and omits information regarding the threat of ignition of a vapor cloud.⁷

Not only was the required risk assessment of co-locating a gas pipeline and nuclear plant not conducted, the required vandalism assessment⁸ at this key terrorist target was also never conducted.

In protecting the interests of the pipeline owners, FERC is ignoring the unacceptable risk and disastrous consequences to the public of this significant threat to national security. Pretending it is safe will not protect us.

⁴Kuprewicz Declaration https://drive.google.com/file/d/0B7g3zFc9C_r6TUMxbHRGWWg0UHc/view

⁵ PHMSA Regulation 49CFR192 .917,.922, .935

http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Pipeline/49_192_highlight_8_15.pdf

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<https://www.dropbox.com/s/qpykdp4vr4oor/20160325%20PHMSA%20DOT%20FOIA%20Resopnce%20no%20records.pdf?dl=0>

⁷ Blanch and Kuprewicz Declarations https://drive.google.com/file/d/0B7g3zFc9C_r6Z3dKMVZSYnJjeGc/view, https://drive.google.com/file/d/0B7g3zFc9C_r6TUMxbHRGWWg0UHc/view

⁸ <https://law.resource.org/pub/us/cfr/regulations.gov.docket.03/asme.b31.8s.commentary.pdf>