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April 17, 1980

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Indian Point

Dear Mr. Schwencer:

UCS is in receipt of a letter sent to you dated March 26, 1980, stating that "it would be very helpful if [UCS] would identify other discrepancies" which we believe to represent inaccuracies in the SER's for Indian Point Unit 3, so that you can review these. I must first confess some curiosity about the purpose and timing of the request. Are you under any direction from the Commission to do some review and/or do you intend to transmit the results to the Commission? Are you now reviewing the particular discrepancies noted by Mr. Pollard in his February 5, 1980 presentation to the Commission? If so, have you reached any conclusions and have you transmitted these to the Commission? We request a copy of any such findings.

We have not prepared a list of inaccuracies in the Indian Point SER's and I will note here that Mr. Pollard's remarks should not be construed as limited to Unit 3. The task of doing so would take some time, and might not be possible for us to do completely, particularly in view of our limited access to the underlying documentation in NRC files. For example, as you know, staff inputs to the SER's are not publicly available. However, a relatively straightforward procedure can be used by the staff to identify the discrepancies for both Units 2 and 3. We would suggest the following:

1. Compare the staff inputs to the SER with the published version. Explain the changes.
2. Compare the "positions" taken by the staff in so-called "Round two" type questions to the licensees with the published version of the SER. Explain the cases where the staff's "position" was not implemented.

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3. Compare the testimony given by the staff before the Joint Committee on Atomic Energy to rebut Mr. Pollard's resignation report with current staff requirements for both Units. Fire protection is an excellent issue with which to start. Explain the changes in staff positions.

We would be happy to consult with you during the review and to comment on your findings. We believe that an unbiased review of Indian Point along the lines suggested would go far toward demonstrating that NRC has taken the findings of the Kemeny and Rogovin investigations to heart.

Very truly yours,



Ellyn R. Weiss

ERW/dmw