

CONSOLIDATED EDISON COMPANY of NEW YORK, INC.  
4 IRVING PLACE, NEW YORK, N. Y., 10003

POWER AUTHORITY of the STATE of NEW YORK  
10 COLUMBUS CIRCLE, NEW YORK, N. Y. 10019

June 3, 1980

Re: Indian Point Unit No. 2  
Docket No. 50-247

Indian Point Unit No. 3  
Docket No. 50-286

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

We write to advise you of recent developments in the area of emergency preparedness at Indian Point Units 2 and 3, subsequent to a discussion of that subject contained in the Director's Decision dated February 11, 1980. Following the accident in March 1979 at the Three Mile Island nuclear plant, the Nuclear Regulatory Commission (NRC) issued a series of new, more stringent requirements for emergency plans at all commercial nuclear generating facilities. The Consolidated Edison Company of New York, Inc. (Consolidated Edison) and the Power Authority of the State of New York (Power Authority) have acted to implement all of these requirements in a timely and thorough manner for Indian Point Unit 2 and Indian Point Unit 3, respectively.

In addition, the Power Authority and Consolidated Edison are working to establish a comprehensive emergency preparedness program which encompasses not only regulatory requirements, but also other pertinent aspects of emergency planning. The ongoing work in these areas strives for achievement of an integrated emergency preparedness program which exceeds the applicable regulatory requirements.

The Power Authority and Consolidated Edison have been assisting the governmental emergency preparedness officials who are responsible for implementing emergency procedures so that the required changes may be made and submitted for NRC approval. Coordination is taking place with State emergency preparedness officials, the civil defense authorities of Westchester, Rockland, Orange and Putnam counties and the City of Peekskill.

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The progress of the emergency procedures planning effort as set forth below should enable the NRC to understand the licensees' extensive ongoing efforts to improve emergency planning. Consolidated Edison and the Power Authority submitted to the NRC, by letters dated March 27, 1979, and March 29, 1979, respectively, a revision to their approved emergency plan to incorporate the requirements of Regulatory Guide 1.101, Revision 1. Subsequently, Consolidated Edison by letters dated November 9, 1979 and February 14, 1980, and the Power Authority by letters dated November 9, 1979 and February 21, 1980, submitted to the NRC two additional revisions to their emergency plans in response to NRC requests.

Consolidated Edison and the Power Authority are presently proceeding to further revise their emergency plans and assisting in revising those of the State and local governments to meet the interim guidance and requirements of NUREG-0654. Among other actions, Consolidated Edison and the Power Authority have taken and are taking the following steps:

- 1) Consolidated Edison and the Power Authority have retained EDS Nuclear Inc. to assist New York State and Westchester County in revising their emergency plans to meet current NRC requirements. EDS Nuclear is also assisting Orange, Putnam and Rockland counties in developing emergency plans that meet current NRC requirements.
- 2) In response to an NRC request dated November 29, 1979, Consolidated Edison and the Power Authority submitted to the NRC by letters dated January 31, 1980 an analysis of the time required to evacuate a ten-mile radius around the Indian Point site. Consolidated Edison and the Power Authority have retained Parsons Brinckerhoff Quade and Douglas, Inc. to develop comprehensive evacuation plans and implementing procedures for the ten-mile radius area around the Indian Point site.
- 3) Consolidated Edison and the Power Authority have initiated studies to determine the best methods of alerting the population within a ten-mile radius of the Indian Point site. Methods under study include a siren system, a system utilizing telephone equipment, radio alert systems and a combination of these methods.
- 4) Consolidated Edison and the Power Authority are installing in all four counties a network of radiation monitoring devices at utility-owned sites and public safety facilities operable on a 24-hour basis. Eighteen (18) area monitors have been installed to date.

- 5) Additional radiation monitoring devices will be installed at locations around the Indian Point site. These devices will continuously telemeter radiation level readings to a central location. The NRC may interrogate the central location and obtain data directly. This equipment is scheduled to be installed and operable by the end of 1980.
- 6) Consolidated Edison and the Power Authority are procuring and installing the MIDAS system, a minicomputer-based system, which is capable of:
  - a) calculating the dispersion path of radioactive material if released to the atmosphere by the plant;
  - b) obtaining meteorological information from a backup meteorological tower when the primary tower is out of service, thus providing assurance that basic meteorological information is available during and immediately following an accidental airborne radioactivity release;
  - c) providing an input to the assessment of the consequences of accidental radioactive releases to the atmosphere; and
  - d) providing simultaneous real-time meteorological data and transport and diffusion estimates in the vicinity of the site to the licensee, emergency response organizations and the NRC Staff, on demand.
- 7) Consolidated Edison and the Power Authority are participating in the DOE/FEMA ARAC pilot project by installing the ARAC system, currently scheduled for this Fall, at the Indian Point site. The ARAC system is also a minicomputer system and will be utilized in conjunction with the MIDAS system to provide verification of various meteorological/radiological computer programs for the Indian Point site. It is anticipated that such verification programs will be conducted in cooperation with N.Y.S. Department of Health, NOAA, FEMA, NRC and DOE.
- 8) Consolidated Edison has completed training of some 60 additional personnel who would assist radiation monitoring teams already assigned to this function in the event of an emergency at either Indian Point Unit 2 or Unit 3.


- 9) Consolidated Edison has trained county emergency preparedness personnel in radiological monitoring procedures and will continue to offer this service to emergency services personnel of all four counties.
- 10) The Consolidated Edison Medical Department has procured inventories of potassium iodide to be used as a prophylaxis in the event of a radiological emergency. Consolidated Edison distributes, under medical supervision, potassium iodide to Consolidated Edison and Power Authority employees with a designated emergency response function. Sufficient inventories are maintained to distribute, under medical supervision, to other emergency response personnel as needed. In addition, sufficient inventories are maintained for the distribution to special facilities (residents and staff) in the 10 mile plume exposure pathway EPZ (i.e. hospitals and other special care institutions). Use of such inventories in a radiological emergency will be made only under specific direction and authorization of appropriate medical and governmental authorities.

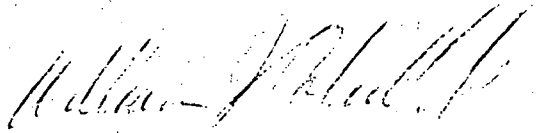
It is anticipated that the aforementioned revisions to the various emergency plans will be completed in the time frame which will be specified when the emergency planning rule becomes effective.

Because we believe that our current filings with the NRC may not fully reflect the emergency plan developments described above, and because the state of emergency planning at Indian Point appears to be a matter of some interest to the Commissioners, we request that a copy of this letter be placed on the docket of each licensee.

Should the Commissioners, you or your Staff have any questions, please contact us.

Very truly yours,

  
Paul J. Early  
Vice President and  
Assist. Chief Engineer  
(Projects)  
Power Authority of the  
State of New York

  
William J. Cahill, Jr.  
Vice President  
Consolidated Edison Co.  
of New York, Inc.

cc: Peter Crane, Esq., NRC General Counsel's Office  
U. S. Nuclear Regulatory Commission  
John F. Ahearne, Chairman  
Peter A. Bradford, Commissioner  
Victor Gilinsky, Commissioner  
Joseph Hendrie, Commissioner  
Richard T. Kennedy, Commissioner  
Samuel J. Chilk, Secretary to the Commission  
Ellyn Weiss, Esq.

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Vice President and  
Assist. Chief Engineer  
(Projects)  
Power Authority of the  
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