Before the
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of   ) $2-26-71$

CONSOLIDATED EDISON COMPANY   )   Docket No. 50-247
   OF NEW YORK, INC.   )
   (Indian Point Unit No. 2)   )
_____   )

MOTION OF
ENVIRONMENTAL DEFENSE FUND, INC.
FOR DETERMINATION OF ENVIRONMENTAL ISSUES

     Intervenor, Environmental Defense Fund, Inc., hereby requests
that this Board determine that:

    1) This hearing will include consideration of all
aspects of the environmental impact of Indian Point
Unit No. 2 prior to issuance of an initial decision for
a license to operate the plant as required by the
National Environmental Policy Act.

    2) The Board will fully explore all environmental
issues related to the operation of Indian Point Unit
No. 2 regardless of whether these issues are raised
by intervenors and regardless of whether the applicant has
submitted certificates of compliance with state, regional
or federal environmental standards or requirements.

    3) If the Board grants this motion or any part of
it the Board will schedule a conference type hearing 60
days after action on this motion at which hearing inter-
venor, EDF, will identify in detail the environmental
issues it intends to raise in this proceeding including
any issues related to the legal adequacy of the Applicants
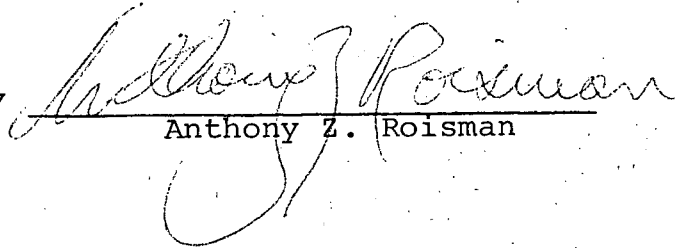Environmental Report and the Detailed Environmental Statement.

4) If the Board denies all other aspects of this
motion, it will schedule a conference type hearing no
less than 30 days after action on this motion at which
hearing intervenors, EDF, will identify in detail the
radiological environmental issues it intends to raise
in this proceeding and the additional legal issues it
intends to raise related to compliance by Applicant and the
Commission with all aspects of Appendix D other than Para-
graph 11a.

A Memorandum in Support of this Motion is attached.

Respectfully submitted,

BERLIN, ROISMAN AND KESSLER
Counsel for Intervenor,
Environmental Defense Fund, Inc.

By _____
        Anthony Z. Roisman

Dated: February 26, 1971.