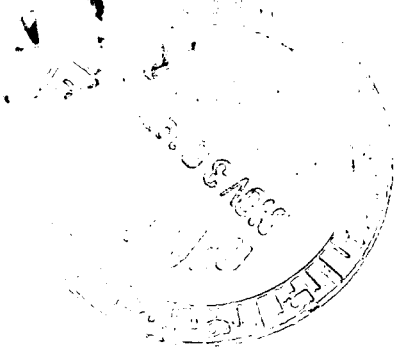


17-25-70

BEFORE THE  
UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION



In the Matter of

CONSOLIDATED EDISON COMPANY  
OF NEW YORK, INC.  
(INDIAN POINT UNIT NO. 2)

Docket No. 50-247

PETITION FOR LEAVE TO INTERVENE

This Petition for Leave to Intervene is filed on behalf of the Citizens Committee for the Protection of the Environment (hereinafter Petitioner).

Interest of Petitioner

The Petitioner is an unincorporated association with offices at One Spring Street, Ossining, New York, organized for the purpose of taking appropriate action to protect the environment against various insults produced by modern technology. It has approximately 2,000 members, about 50 percent of whom reside and/or work in Westchester County and about 20 percent of whom reside and/or work within a radius of 20 miles of the proposed Indian Point Nuclear Generating Unit No. 2. Many of Petitioner's members use the Hudson River, in close proximity to the proposed facility, for boating, fishing, bathing, and other recreational purposes. The Petitioner

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and its individual members are concerned with the preservation of marine and plant life in the vicinity of the proposed facility and in preserving the usefulness of the Hudson River for recreational purposes. The Petitioner and its individual members are also concerned about the possibility that operation of the proposed facility will create conditions detrimental to the health and safety of the Petitioner's members, their neighbors, the communities in which they reside, and the economic well-being of the area.

#### Interest Affected

The interest of the Petitioner and its individual members may be affected by the Commission's action in this proceeding in that if the Commission licenses operation of the proposed facility and in the event of an accident during operation of the proposed facility, the health, safety, lives, and property of Petitioner's individual members, and of others who reside, work, or visit, or who use the vicinity for recreational purposes, would be endangered.

#### Contentions

1. The plant design does not include sufficient safety features to remove the risk of a catastrophic release of deadly radiation, particularly I-131, which could cause a major disaster for the thousands of people living within close proximity to the plant.

2. Safety features designed for use in case of a major melt down of the core elements (such as the sodium hydroxide spray system) have not been adequately tested to assure the safety of the thousands of residents of nearby communities.

3. The operation of a pressurized water reactor of this size within close proximity to areas of population concentration and within a river valley which will tend to concentrate radioactive releases along the length of the river is, as a practical matter, an experiment and is being proposed for operation without adequate testing and study of the plant design and operation to eliminate all safety hazards associated with design basis accidents and more major accidents.

4. The plant does not include the best possible and technologically most advanced systems for warning the general populace which could be affected by a reactor accident of the existence of a danger and of the steps to be taken to reduce that danger.

5. In general the plant is ill-equipped to deal with accidents involving radioactive releases and applicant has not provided sufficient information to assure the public that all critical aspects of the plant systems to deal with accidents have been adequately tested.

6. Discovery proceedings before the hearing should further clarify these contentions and may indicate other areas of concern.

For the reasons stated above the Citizens Committee for the Protection of the Environment requests that it be permitted to intervene in this proceeding to challenge the issuance of an operating license to the Applicant.

Respectfully submitted,

BERLIN, ROISMAN AND KESSLER  
1910 N Street, N. W.  
Washington, D. C. 20036

By *Anthony Z. Roisman*  
Anthony Z. Roisman

Counsel for  
Citizens Committee for the  
Protection of the Environment  
One Spring Street  
Ossining, New York

SWORN TO before me, *Don E Day*, a notary public in and for the District of Columbia, this 25th day of November, 1970.

*Don E Day*  
Notary Public, D.C.

My Commission Expires: *June 30 1974*

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CERTIFICATE OF SERVICE

I hereby certify that copies of Petition for Leave to Intervene and Notice of Appearance, dated November 25, 1970, have been served on the following by deposit in the United States mail, this 25th day of November, 1970:

Samuel W. Jensch, Esq.  
Chairman, Atomic Safety & Licensing Board  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

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