

BERLIN, ROISMAN AND KESSLER

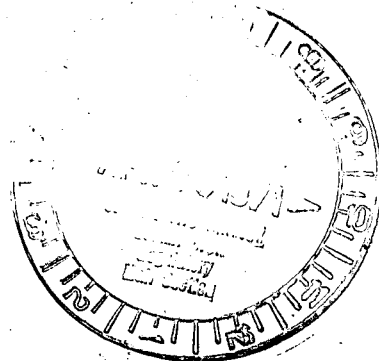
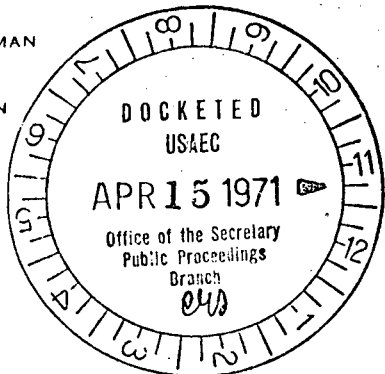
1910 N STREET, NORTHWEST
WASHINGTON, D. C. 20036

DOCKET NUMBER
PROD. & UTIL, EAC. 50-247

AREA CODE 202
PHONE 293-5764

EDWARD BERLIN
ANTHONY Z. ROISMAN
GLADYS KESSLER
DAVID R. CASHDAN

April 12, 1971



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

Re: Consolidated Edison Company
of New York, Inc.
(Indian Point No. 2)
Docket No. 50-247

Dear Mr. Chairman:

This is to confirm that the brief submitted on April 8, 1971, by Angus McBeth, is also to be considered the brief on behalf of the Environmental Defense Fund.

I should also like to draw the Boards attention to Section 556(d) of U.S.C. Title 5 (the Administrative Procedure Act) which indicates that in proceedings such as this (see 5 U.S.C. Section 554) a party is "entitled to present his case or defense by oral or documentary evidence, to submit rebuttal evidence, and to conduct such cross-examination as may be required for a full and true disclosure of the facts." We submit that it is in exercise of that right that the motion for discovery has been submitted.

Sincerely,

Anthony Z. Roisman
Anthony Z. Roisman

AZR/aw

CC: J. D. Bond, Esq.
Alternate Chairman
Atomic Safety & Licensing Board

Mr. Stanley T. Robinson, Jr.
Chief, Public Proceedings Branch
Office of the Secretary
U. S. Atomic Energy Commission

All Parties of Record

811110067 710412
PDR ADDCK 05000247
G PDR

Leaming