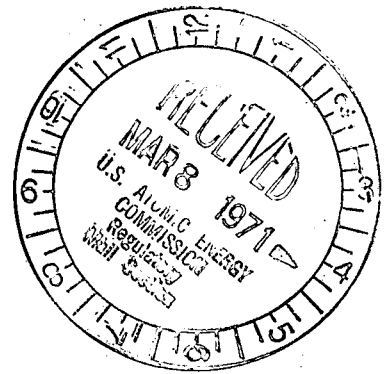


Before the
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION



----- X
In the Matter of :
CONSOLIDATED EDISON COMPANY :
of New York, Inc. :
: Docket No.
(Indian Point Unit No. 2) : 50-247
----- X 3-2-71

Motion of Hudson River
Fishermen's Association for a Deter-
mination of Non-Radiological Environ-
mental Issues.

Hudson River Fishermen's Association, Intervenor,
moves this Board to rule that:

(1) As required by the National Environmental Policy Act of 1969, 42 U.S.C. §4321 et seq., the Board will consider in this proceeding all aspects of the environmental impact of the operation of Indian Point Unit No. 2 prior to any decision on the issuance of an operating license; and

(2) The Board on its own initiative, will explore and consider all aspects of such environmental impact, regardless of whether or not the applicant has obtained and submitted certificates of compliance with federal, state or regional standards or requirements touching environmental matters and regardless of whether or not intervenors raise any environmental issues.

*See separate jacket
for compl. encl.*

8111111113 710302
PDR ADOCK 05000247
G PDR

A memorandum of law is submitted in support
of this motion.

Dated: New York, New York

March 2, 1971

ANGUS MACBETH

RICHARD M. HALL
Natural Resources Defense
Council, Inc.
Attorneys for Hudson River
Fishermen's Association, Intervenor.
36 West 44th Street.
New York, New York 10036
(212) 986-8310