

BEFORE THE
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)
)
CONSOLIDATED EDISON COMPANY)
OF NEW YORK (Indian Point,)
Unit No. 2))

7-13-71.
Docket No. 50-247

PROPOSED CROSS-EXAMINATION BY
CITIZENS COMMITTEE FOR THE PROTECTION OF THE ENVIRONMENT
WITH RESPECT TO SUPPLEMENTAL DIRECT TESTIMONY OF
THE APPLICANT AND THE
NEW YORK STATE ATOMIC ENERGY COUNCIL

1. Response of Mr. John D. McAdoo to Item 3.a, 3.g of Proposed Factual Findings of the Citizens Committee for the Protection of the Environment.

a. How will the conclusions in lines 7-12 of page 1 be affected by the new AEC Interim Guidelines which exclude consideration of the use of accumulators in analyzing a LOCA?

b. To what extent does the statement that "there is no oxygen present" (P. 1, lines 11-12) take account of the presence of oxygen in steam and air bubbles caught in the reactor after rapid depressurization and in general what is the basis for and test data to support this conclusion?

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c. To what extent does the statement (P. 1, lines 7-12) take account of, 1) places within the reactor vessel which are not in the direct path of escaping steam, and 2) the results of the recent semi-scale tests in Idaho in which steam apparently remained in the reactor longer than anticipated and prevented ECCS water from reaching the reactor?

d. In lines 19-21, Page 1, upon what do you base the conclusion that the energy release will be insufficient to damage the pressure retaining components? In particular

- 1) define pressure retaining components;
- 2) indicate assumptions used with respect to amount of hydrogen in any given accumulation, location of the accumulation, basis for these assumptions, etc.; and
- 3) exact amount of energy release and maximum increase of pressure caused by the release, where it will occur (i.e. what portion of the reactor vessel), total pressure at the point, maximum design basis for pressure at that point.

2. Response of John McAdoo to Item 3.b.3 of the Proposed Factual Findings of the Citizens Committee for the Protection of the Environment.

a. Provide a description of the tests and the complete test results -- a copy of the data has been requested from the Applicant.

b. Relate these test results to the discussion of this problem in WCAP 7499-L dated April, 1970 and alleged by Westinghouse to be proprietary and to this problem as discussed in the Initial Decision in Indian Point, No. 3.

3. Response of Joseph A. Prestele to Item 6.b. of the Proposed Factual Findings of the Citizens Committee for the Protection of the Environment.

a. the scope of cross-examination will relate to an examination of various techniques which might be used to enter the plant and the effectiveness of the systems described to prevent entry -- Applicant has indicated it wishes this inquiry to be in camera and pending a ruling of the Board we shall not be more specific with respect to the nature of the cross-examination.

b. Questions seeking further data with respect to the proposed electronic detection system including its state of development, design and anticipated date of installation.

c. Questions seeking further data on the nature of the alarms and indicators installed at the controlled areas.

4. Response of John Grob to Item 6.c. of the Proposed Factual Findings of the Citizens Committee for the Protection of the Environment.

a. A copy of the probability analysis has been requested from the Applicant.

5. Response of Joseph Prestele to Item 11 of the Proposed Factual Findings of the Citizens Committee for the Protection of the Environment.

a. What specific training do the operators receive to prepare them for coping with major power need and nuclear plant emergencies.

b. What options exist in these cases with respect to when to shut down the plant.

c. Are there manual overrides for the automatic plant shut downs.

d. To what extent will too rapid plant shut down affect public health and safety by reducing or eliminating needed electric power.

6. Testimony of Sherwood Davies with respect to New York State Emergency Plan and Item.

- a. P. 4 - will local public bullhorns advise as to ventilation systems, chimneys, etc. and how are police instructed as to the type of warning to give including the tone of voice and choice of words?
- b. P. 4 - what test drills have been run to verify the time to contact officials, the time to obtain necessary information and the time to initiate action?
- c. P. 5 - what charts exist to identify where key officials live, accessibility of their phones, emergency travel arrangements in case of inclement weather or unavailability of personal transportation?
- d. P. 5 - have the key persons to be notified (paragraphs 1) - 4)) been advised in advance of the emergency procedures and what they are to do? Have there been drills? Do they have their own emergency plans?
- e. P. 5 - what information exist on the continuous availability of non-pasture feed products for farm animals?
- f. P. 5 - what drills or tests have been run to verify the time estimates?

g. P. 7 - basis for estimate that 15 professionals with equipment are available for monitoring and/or assessment including location, condition of equipment, preparation for emergency action, etc.

h. P. 8a - describe in detail and produce a copy of the "State's large-scale general emergency response capacity".

i. P. 9 - describe the basis for the time estimates used including results of drills and tests.

j. P. 10 - describe procedures for use of bull horns and low population zone evacuation including drills, prior notice to official and residents involved in possible evacuation, etc.

k. P. 10 - describe in detail the resources available and plans with respect to the use of general evacuation plans including traffic routes, traffic controls, personnel briefing, public information and drills before an accident, etc.

l. P. 10 - describe the plans for the use of armories and medical facilities including under what conditions these would be used, what is available, prior notice to key personnel on their use, etc.

m. P. 10 - what tests, drills and other data substantiate the time estimates given?

n. P. 14 - in detail describe the specific response actions for the Indian Point reactors and all other precise actions to be taken to protect the public. Also provide copies of all documents prepared which set forth these precise actions.

o. P. 15 - how will the public know how to fully seal their homes without prior instructions indicating techniques to be used?

p. P. 15 - how will the public know how to evacuate without prior instructions on what to carry with them, what to do with electricity and gas at their homes, securing personal belongings, contacting other members of the family, etc.?

q. P. 16 - does the accident consequences upon which this testimony is based incorporate the 10% of AEC and Applicant conservatively estimated accident releases referred to on pp. 7-8a of your testimony?

r. Pp. 17-18 - What prior instructions have been given to the police on the use of bull horns and the areas to be covered? Is there an emergency plan for these police and if so, what is the plan and please provide copies. What is the range of the bull horns and how often are they checked to see if they are functioning? Do they use batteries and are spares available? What techniques would be used to reach persons in apartment buildings and in automobiles? Do the police and local officials have any special training (as do members of the Public Information Office) to deal with these emergencies? Please describe.

s. Pp. 19-20 - Would the range of accident conditions for which supplemental food supplies would be necessary include accident release levels equal to or less than maximum releases from a design basis accident as assumed by the AEC or the Applicant?

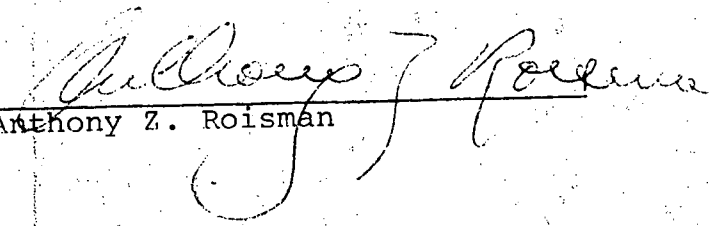
t. P. 20 - What methods are used to contact farmers other than radios? What are the radio listening habits of farmers during mid-day and during the late night, early morning?

u. P. 21 - Describe in detail the circumstances under which limited restrictions on water use would occur and the specific restrictions applicable to each circumstance including the means for implementation of the restrictions.

Respectfully submitted,

BERLIN, ROISMAN AND KESSLER
Counsel for the Citizens Committee
for the Protection of the Environment

By


Anthony Z. Roisman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Proposed Cross-Examination by Citizens Committee for the Protection of the Environment with Respect to Supplemental Direct Testimony of the Applicant and the New York State Atomic Energy Council, were hand-delivered, or mailed this 13th day of July, 1971 to the following:

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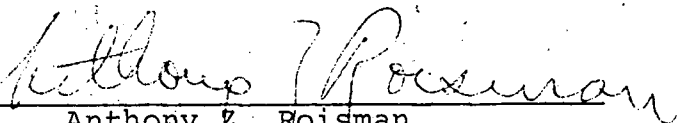
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