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WASHINGTON, D. C. 20036

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EDWARD BERLIN  
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June 8, 1971



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

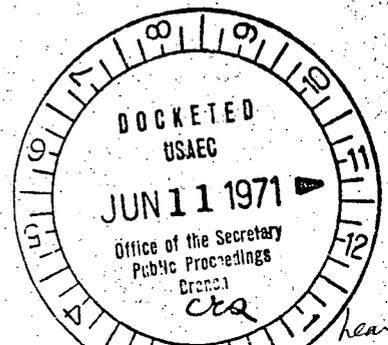
Re: Indian Point Station, Unit  
2, Docket No. 50-247

Dear Mr. Chairman:

On June 7, 1971, we received from the Staff their response to our request for production of documents. The response is defective in several respects.

First, Item 1 requested all recent tests and analyses conducted with respect to the ECCS and which were referred to by Chairman Seaborg in his letter to the Joint Committee. What the Staff produced is the monthly summary of the Idaho Nuclear Corporation which contains a totally inadequate description of the tests in question and the results of those tests. Obviously the Senior Task Force in its review is using considerably more detailed documents and it is these documents which we have requested. If Staff Counsel has no personal knowledge of other documents then he should be obligated to ask the Senior Task Force or the Director of Regulation or both what test results and analyses are being used.

In Item 2 we requested a list of all documents and other data being considered by the Senior Task Force and, aware of the fact that this list will expand as the review continues, we asked to have the list updated from time to time. The Staff refused to provide the list at this time. As we indicated in our initial request having the list of documents being considered by the Task Force would enable us to expedite these proceedings. It would also enable us to submit our views to the Task Force just as the reactor manufacturers and perhaps even the Applicant here are doing.



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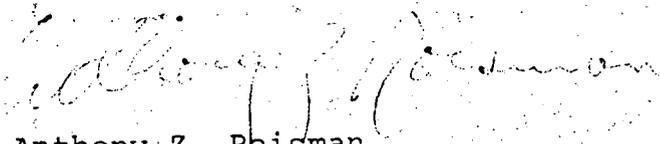
Samuel W. Jensch, Esq.

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We therefore request that the Board grant our original motion for production of documents and order the Staff to produce the documents requested.

Respectfully submitted,

  
Anthony Z. Roisman  
Counsel for Citizens' Committee  
for the Protection of the  
Environment

cc: All on Service list