

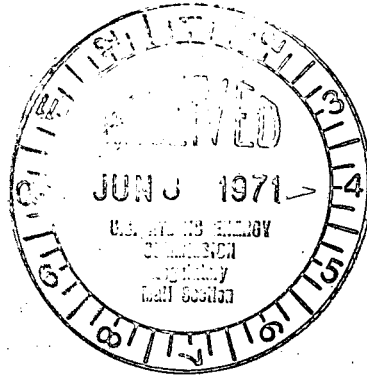
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June 4, 1971



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

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

Dear Mr. Chairman:

Enclosed herewith is a statement of position of the Citizens Committee for the Protection of the Environment with an attached statement of proposed findings of fact and proposed supporting data. Because of the present uncertainty regarding data on the ECCS we have deleted any proposed finding with respect to the ECCS' function and will provide such proposals within a reasonable time after the AEC Senior Task Force has completed its re-evaluation and discovery on this issue has been completed. We shall provide the Board, by June 18, 1971, with proposed findings related to the issues outlined in the Board's order of April 13, 1971.


There are several factual matters relating to issues of safety which are outstanding at this time. Questions raised by the Board, relating to safety, have not been answered. We have outstanding requests for documents to which the Applicant and the Staff have not responded. Some material requested from the Staff in Set I of our questions has been promised, but not received. The hearings themselves may uncover some new data.

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All of these unresolved matters prompt us to advise the Board and the parties that the material submitted today represents an outline of our position on factual matters, but we do not view this submittal as preventing us from supplementing the issues raised or the data supporting those issues. We, of course, will not raise any new factual issues totally unrelated to these matters, but we do believe that we are entitled to expand issues already raised, add further data to support those issues or further refine specific factual contentions.

We hope to meet with the applicant and the Staff in the near future to attempt to arrange for stipulations as to documents and details of the presentation of the case at the hearings.

Sincerely,

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

AZR/aw  
Enclosures