

Natural Resources Defense Council, Inc.

36 WEST 44TH STREET
NEW YORK, N.Y. 10036

212 986-8310

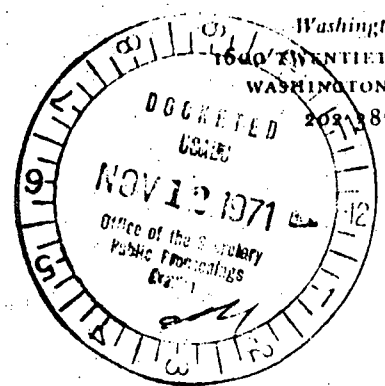
BOARD OF TRUSTEES

- Stephen P. Duggan, Esq.
Chairman
- Mrs. Louis Auchincloss
- Boris I. Butler, Esq.
- John T. Booth
- Thomas Cashel, Esq.
- Dr. Rene J. Dubos
- Robert W. Gilmore
- Dr. Joshua Lederberg
- James Marshall, Esq.
- Ruby G. Martin, Esq.
- John B. Oakes
- The Rev. C. M. F. Phillips
- Dr. Gilford A. Pinchot
- Charles A. Reich, Esq.
- John R. Robinson, Esq.
- Laurance Rockefeller
- J. Willard Roosevelt
- David Sica
- Dr. George M. Woodwell
- Edwin M. Zimmerman, Esq.
- John H. Adams, Esq.
Executive Director

November 9, 1971

Leonard M. Trosten, Esq.
 LeBoeuf, Lamb, Leiby & MacRae
 1321 Jefferson Place, N.W.
 Washington, D.C. 20036

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



Dear Mr. Trosten:

I enclose Set IV of inquiries to Consolidated Edison to which we request a response in writing and I also enclose Set D of requests for the production of documents which is addressed to the Regulatory Staff of the Commission. I believe I have covered these areas with you in other communications. Nevertheless, if Con Edison has in its control material within the ambit of the requests which has not already been produced for the intervenors, I request that such material be produced.

The orderly progress of these expedited hearings require speedy and complete answers from Consolidated Edison on the questions and requests put to them. I hope for your full cooperation on this matter.

Anthony Z. Roisman, on behalf of EDF, joins me in these requests.

Yours sincerely,

Angus Macbeth
 Angus Macbeth

AM/js
 Enclosures
 cc:

- Mr. Stanley T. Robinson, Jr.
- Samuel W. Jensch, Esq.
- J. Bruce MacDonald, Esq.
- Myron Karman, Esq.
- Anthony Z. Roisman, Esq.
- Mr. R.B. Briggs
- Dr. John C. Geyer
- Honorable William J. Burke

8110310134 711109
 PDR ADOCK 05000247
 G PDR

hearing

50-247

Natural Resources Defense Council, Inc.

36 WEST 44TH STREET
NEW YORK, N.Y. 10036

212 986-8310

Washington Office

1600 TWENTIETH STREET, N.W.
WASHINGTON, D.C. 20009

202 387-2355

November 9, 1971

Myron Karman, Esq.
Counsel, Regulatory Staff
U.S. Atomic Energy Commission
Washington, D.C. 20545

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

Dear Mr. Karman:

I enclose copies of Set IV of inquiries to Consolidated Edison.

I also enclose Set D, requests for the production of documents which is addressed to the regulatory staff.

In accordance with the usual procedure, I request that the Staff comment on the responses that are received from Consolidated Edison. I hope for your full cooperation in meeting the expedited schedule in this proceeding.

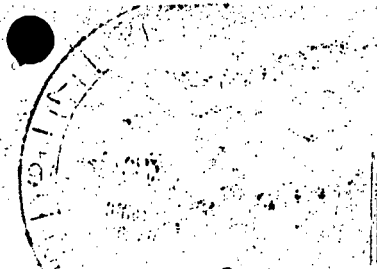
Anthony Z. Roisman, on behalf of EDF, joins me in these requests.

Yours sincerely,


Angus Macbeth

AM/js
Enclosures
cc:

Mr. Stanley T. Robinson, Jr.
Samuel W. Jensch, Esq.
J. Bruce MacDonald, Esq.
Leonard M. Trosten, Esq.
Anthony Z. Roisman, Esq.
Mr. R.B. Briggs
Dr. John C. Geyer
Honorable William J. Burke



Set IV: Questions and Inquiries

- 1) Measured at the intake, what is the temperature range of cooling water over which the turbines in (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3 are designed to operate?
- 2) Measured at the intake, what is the maximum temperature of cooling water at which the turbines in (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3 can operate continuously?
- 3) Measured at the intake, what is the maximum permissible temperature of service water for (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3?
- 4) What is the installed cost for the coolant pumps for (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3?
- 5) What is the installed cost for the service water pumps for (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3?
- 6) With reference to ERS 2-3-6-28, indicate the cost of construction of proposed new intake channel and screen structure.
- 7) With reference to ERS 2-3-6-28, indicate the individual permits from local, state and federal agencies that are required in order to construct the proposed new intake channel and screen structure.

8) What ownership interest does Con Edison have in each of the following electric generating plants in the Hudson River:

(a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3, (d) Storm King, (e) Bowline, (f) Danskammer, (g) Roseton, (h) Lovett.

9) What responsibility does or will Con Edison have for the operation of each of the following electric generating plants in the Hudson River: (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3, (d) Storm King, (e) Bowline, (f) Danskammer, (g) Roseton, (h) Lovett.

10) What responsibility does or will Con Edison have for the construction of each of the following electric generating plants on the Hudson River: (a) Indian Point Unit No. 3, (b) Storm King, (c) Bowline, (d) Danskammer, (e) Roseton.

11) What rights or options to purchase electrical output does Con Edison have with regard to each of the following Hudson River generating plants: (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3, (d) Storm King, (e) Bowline, (f) Danskammer, (g) Roseton, (h) Lovett.

12) With reference to ERS 2-5-9, in the chart items 6 and 9 thru 12 are considered effective; with regard to each of those items what changes led to the conclusion that the item was effective?

- 13) Indicate the temperature rise from intake point to exit from the discharge channel for water passing through (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3, (d) Lovett, (e) Bowline, (f) Danskammer, (g) Roseton.
- 14) Indicate the dwell time for a particle between entering the water box and leaving the plant (but not the discharge channel) for each of the following plants: (a) Indian Point Unit No. 1, (b) Indian Point Unit No. 2, (c) Indian Point Unit No. 3, (d) Lovett, (e) Bowline, (f) Danskammer, (g) Roseton.
- 15) Indicate the results of Raytheon's survey of zooplankton for the last six months of 1969.
- 16) ERS, App. Q, Table 9-11 and IP-73, Table 6-8 indicate different depths for samples taken at stations 12 and 22; indicate the reasons for this discrepancy.
- 17) Under normal operating conditions, indicate the rate of flow of water in cubic feet per second in Indian Point Unit No. 2 (a) in the water box, (b) at the point of discharge from the plant, (c) at the point of discharge into the Hudson River.
- 18) When "throttled down" indicate the rate of flow of water in cubic feet per second in Indian Point Unit No. 2 (a) in the water box, (b) at the point of discharge from the plant, (c) at the point of discharge into the Hudson River.

19) With reference to ERS 2.3.6-1, what are the boundaries of the "study area"?

20) In the manner of ERS, App Q, Fig. 9-4, indicate the spatial distribution of white perch found by Raytheon in 1970.

21a) With reference to ERS, App Q, 10-6, para. 2, are the larval specimens collected in trawls included in ERS, App Q, Table 9-11?

b) If not, where are the catches of those trawls recorded?

22a) Indicate the location of the stations used by Lauer and his associates for the collection of zooplankton in 1971.

b) Indicate the depth of the water at each station.

Set D: Requests for the Production of Documents

1) Produce any data or documents within the control of the Commission which indicate the effect on fish eggs, larvae and juvenile fish of non-screenable size of passage through the cooling system of a electrical generating plant comparable to Indian Point Unit No. 2.

2) Produce any data or documents within the control of the Commission which relate the water flow through Indian Point Unit No. 2 or other electrical generating plants on the Hudson to the total flow of fresh and/or salt water through the total estuary.