

BERLIN, ROISMAN AND KESSLER

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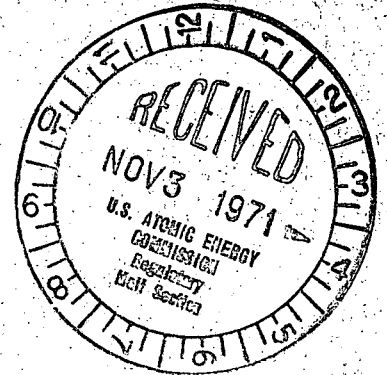
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October 25, 1971



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

Dear Mr. Chairman:

Enclosed herewith is the Statement of Issues and Proposed Cross Examination of the Citizens Committee for the Protection of the Environment with regard to all outstanding matters of radiological safety. The portion of this Statement related to the plant security is separately attached and at the applicant's request is to be treated on a confidential basis. For this reason, copies of that portion of the Statement are being distributed on a limited basis as shown in the Certificate of Service.

Because numerous questions on the ECCS are now outstanding (see our letters of September 16 and October 12), it is not possible to give a final and definitive statement of our position and proposed cross examination on this issue. In subpart C of Paragraph III of the attached Statement we suggest a procedure which we hope will be satisfactory to the Board and the parties to deal with this situation.

Sincerely,

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

AZR/cj

cc: to all persons listed on the service list

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