

DOCKET NUMBER
PROD. & UTIL. FAC. 50-247

Natural Resources Defense Council, Inc.

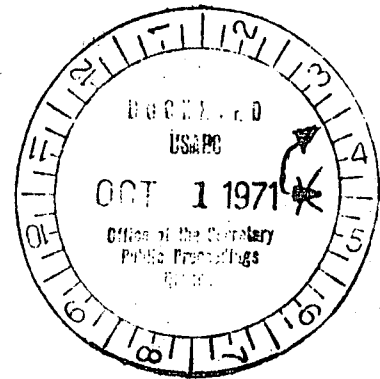
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September 24, 1971



Leonard M. Trosten, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1821 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

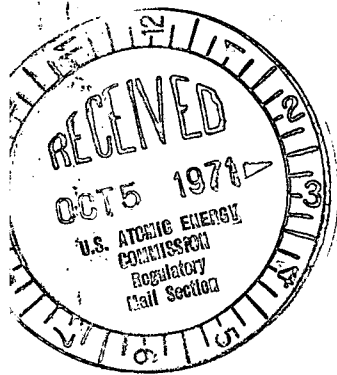
Dear Mr. Trosten:

I am writing this supplemental letter on
HRFA's first round of requests for documents in
response to our conversation this morning.

In response to Requests 1, 2, 3, 4, and 28, I
would like to receive a list of the documents re-
quested giving a descriptive title, author and
date for each. In response to Request 5, I would
like to receive a list giving a descriptive indi-
cation of the subject matter of each report or
study, the date on which the study or preparation
of the report was begun, and the date on which
it is expected to be completed, and name of the
person or institution directing the study or
report. In addition, I would like instructions
on how you would like the contact to be made
with those conducting the studies.

In response to Requests 6 through 27, I
would like to receive a copy of the report or
study requested.

I have discussed with Anthony Z. Roisman both
the exact form of these requests and how we would
like the materials to be made available. We
would like one copy of each document requested



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hearing

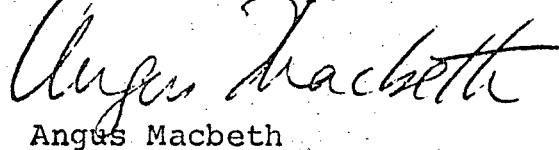
Mr. Leonard M. Trosten
September 24, 1971
Page Two

to be sent to John R. Clark, Box 433, Wickford, Rhode Island 02852 and one copy to Ernst Habicht, 162 Old Town Road, East Setauket, New York, 11733. In addition, we would like one copy to be available for our inspection and use in New York City and one in Washington, D.C. From time to time, we may wish an additional copy of important material in the depository in New York or Washington to be made for our use. We will try to keep such requests to a minimum but would expect you to instruct those in charge of the depository to copy promptly anything we request.

We would like copies of the lists requested to be sent to Clark, Habicht, Dr. Paul P. Craig (5418 Hawthorne Place, N.W., Washington, D.C. 20016), and to ourselves.

I am writing this letter both for myself and for Anthony Z. Roisman as attorney for EDF.

Yours sincerely,



Angus Macbeth

AM/jj

cc: Mr. Stanley T. Robinson, Jr.
Samuel W. Jensch, Esq.
Dr. John C. Geyer
J. Bruce MacDonald, Esq.
Myron Karman, Esq.
Anthony Z. Roisman, Esq.
Mr. R. B. Briggs, Director
Honorable William J. Burke
Paul S. Shemin, Esq.
Algie A. Wells, Esq.

Natural Resources Defense Council, Inc.

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John H. Adams, Esq.
Executive Director

September 23, 1971

Leonard M. Trosten, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1821 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 the first round of requests for documents on behalf of the Hudson River Fishermen's Association in preparation for the hearings in this proceeding which will deal with NEPA issues.

Meeting an expedited schedule for these hearings depends largely on the speed and completeness with which Con Edison replies to those requests. Without prompt disclosure of all the relevant information under the control of Con Edison, the Intervenor will be unable to complete their analysis of the problems presented by the plant and prepare for the hearings.

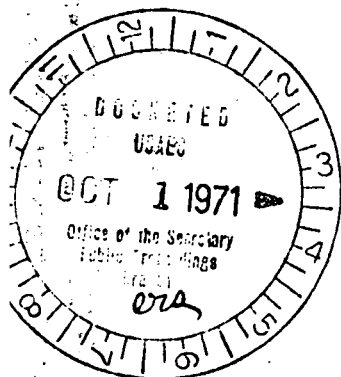
Anthony Z. Roisman, on behalf of EDF, joins me in this request for documents.

Yours sincerely,

Angus Macbeth
Angus Macbeth

AM/js
Enclosure
cc:

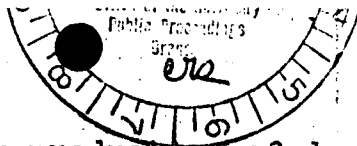
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Myron Karman, Esq.
Anthony Z. Roisman, Esq.
Mr. R.B. Briggs, Director
Honorable William J. Burke



cont'd

PROJECT NUMBER
PROD. & UTIL. FAC. _____

cc: Paul S. Shemin, Esq.
Algie A. Wells, Esq.



Requests for production of documents:

1. All studies or reports made by Con Edison's employees or contracted for by Con Edison or presently within Con Edison's control which relate to marine life in the Hudson in the vicinity of Indian Point Unit No. 1, 2, or 3. Included in this request are all studies or reports dealing with fish and other marine population and movement in the River, types and quantities of fish, eggs, larvae and other marine life in the River, elements of the total environment which affect fish, eggs, larvae and marine life in the River, the food chain on which fish and other marine life depend and effects of environmental changes which affect that chain. This list is suggestive rather than exclusive.

2. All studies or reports made by Con Edison's employees or contracted for by Con Edison or presently within Con Edison's control which relate to the effect of discharging heated water from Indian Point Unit 1, 2, or 3 into the Hudson.

3. All studies or reports made by Con Edison's employees or contracted for by Con Edison or presently within Con Edison's control which relate to the effect of discharging chemicals from Indian Point Unit 1, 2, or 3 into the Hudson.

4. All studies or reports made by Con Edison's employees or contracted for by Con Edison or presently within Con Edison's control which relate to the alternatives to once-through cooling of Indian Point Unit 1, 2, or 3 and Verplanck Unit 1 or 2. Included in this request are all studies or reports which discuss the spatial requirements of cooling alternatives, the cost of cooling alternatives, the possibility of fogging, misting, icing or saline drift from the cooling alternatives, the aesthetic impact of cooling alternatives, chemical and heated water discharges from the cooling alternatives. This list is suggestive and not exclusive.

5. Indicate all studies and reports presently being undertaken by Con Edison's employees or contracted for by Con Edison on any of the subject matter covered by Requests 1 through 4 inclusive.

Indicate the date on which the study or preparation of the report was begun and the date on which it is expected to be completed.

Indicate who may be contacted by Intervenor to obtain access to the data and/or conclusions presently developed in connection with these reports and studies.

6. All studies by Dr. Gerald Lauer of the biology of the white perch in the Hudson River in the vicinity of Indian Point.

7. All studies and investigations directed by Dr. Edward Raney of the swimming performance and temperative preference and avoidance of estuarine fish species.

8. All studies and analyses prepared by Dr. Gwyneth Howells of the environment of the Hudson River at Indian Point.

9. All studies, surveys and performance reviews made by Mr. Herbert Riesbol of fish screening techniques.

10. All reports to Con Edison or its Advisory Board of any study or review made by Dr. R.S.A. Beauchamp of the fish problems encountered at power stations in Great Britain.

11. All studies and reports made to Con Edison or its consultants by Dr. Richard Wolke concerning pathological examinations of dead fish collected from the vicinity of the Indian Point Unit 1, 2, or 3 intake screens.

12. All studies and reports made to Con Edison or its consultants by Dr. Ross Nigrelli concerning pathological examination of fish from the vicinity of the intake screens at Indian Point Unit 1, 2, or 3.

13. All studies and reports made to Con Edison or its consultants by Eastern Fish Disease Laboratory, Bureau of Sport Fisheries and Wildlife; Drs. G.L. Hoffman, R.L. Herman and S.F. Suleszko concerning parasitological and pathological examinations of fish from the vicinity of the intake screens at Indian Point Unit 1, 2, or 3.

14. All studies and reports done for Con Edison or its consultants by Norman Porter Associates concerning water movements and velocities in the vicinity of the Indian Point Unit No. 1, 2, or 3 intake structure.

15. All studies and reports done for Con Edison or its consultants by Dr. J.L. McHugh concerning the approach to a study of the population dynamics of fish in the vicinity of Indian Point.

16. All studies and reports done for Con Edison or its consultants by Dr. Brian Rothchild concerning the development of a program to evaluate the effect of the fish kills at Indian Point on the fish populations in the Hudson River.

17. All studies, reports, or reviews done for Con Edison or its consultants by Dr. James McFadden concerning the entire scope of the ecological studies at Indian Point.

18. All studies, reports or reviews made for Con Edison, its consultants or Advisory Board by or on the work of Mr. Daniel Bates concerning fish protection work and the development of new fish protection devices.

19. All "Progress Reports" submitted to Con Edison or its consultants by the Institute of Environmental Medicine as part of the "Ecological Survey of the Hudson River."

20. All "Annual Reports" submitted to Con Edison or its consultants by the Institute of Environmental Medicine in connection with the "Hudson River at Indian Point."

21. "Development of a Biological Monitoring System and a Survey of Trace Metals, Radionuclides and Pesticide Residues in the Lower Hudson," submitted to Con Edison or its consultants by the Institute of Environmental Medicine.

22. "Hydraulic Survey of Hudson River - The Haverstraw Bay Area - October, 1969" submitted to Con Edison or its consultants by Alden Research Laboratories.

23. "Indian Point Cooling Water Studies - Model No. III" submitted to Con Edison or its consultants by Alden Research Laboratories.

24. All records indicating when fish have been killed in the vicinity of Indian Point Unit 1, 2, or 3 and the approximate number, size and type of fish in each kill from the time Indian Point No. 1 first opened to the present.

25. All records indicating the difference in water temperature between water withdrawn from the Hudson River and the water discharged into the Hudson River for every day water has been discharged from Indian Point Unit 1, 2, or 3, indicating the dates and time of day and the temperatures on each date.

26. Report entitled "Effect of Indian Point Facility on Water Quality of the Hudson River" submitted to N.Y. Department of Environmental Conservation, Public Service Commission and the Department of Commerce on September 18, 1970.

27. All studies or reports done for Con Edison or its consultants by Ichthyological Associates concerning thermal discharges and/or the mortality of fish.

28. All studies, reports or reviews concerning alternatives to once-through cooling in the possession or control of Con Edison regardless of whether such studies, reports or reviews were directly undertaken in connection with Indian Point Unit 1, 2, or 3 or Verplanck Unit 1 or 2.