

BEFORE THE
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)
)
CONSOLIDATED EDISON OF) Docket No. 50-247
NEW YORK (Indian Point,)
Unit No. 2))

CITIZENS COMMITTEE
FOR THE PROTECTION
OF THE ENVIRONMENT
MOTION FOR PRODUCTION
OF DOCUMENTS
DIRECTED TO THE APPLICANT

The Citizens Committee for the Protection of the Environment moves this Board to issue an order requiring the Applicant to produce for inspection and copying at 1821 Jefferson Place, N. W., Washington, D. C. (the office of its counsel) the original or a copy of the following documents:

1. All drawings in their possession or in the possession of their contractors, subcontractors or consultants that show the design and specifications for the reactor support ring, the generator support shoes and the generators including the fit of these components to the other components to which they are attached. To the extent that the drawings have been revised provide the original and all revisions including the most recent drawing showing the component specification and design as presently installed on the reactor.

2. Minutes or memoranda of all meetings attended by Applicant or any of its contractors , subcontractors or consultants at which

the reactor support ring and/or reactor support shoes designs, specifications, modifications or ability to perform their intended functions were discussed.

3. All correspondence received by Applicant, its contractors, subcontractors or consultants relating to the design, specifications, modifications or ability to perform their intended function of the reactor support ring, generator support shoes and the generators,

4. All reports, studies, analyses, audits, inspections in the possession of Applicant, its contractors, subcontractors, or consultants relating to the design, specification, modification or ability to perform their intended functions of the reactor support ring, generator support shoes and the generators.

5. All stress analyses or other inspections, reports, studies or analyses in the possession of Applicant, its contractors, subcontractors or consultants relating to the strength of the reactor support ring, generator support shoes and the generator or relating to the stresses to which these components could be subjected during operation.

6. With reference to all of the documents requested Applicant is requested to produce a copy of all documents which are or have been in its possession or the possession of its contractors, subcontractors and consultants and which are referred to in this motion or which are in any wise related to the subject matter of the letter dated March 14, 1972, from H. K. Brill to L. Manning

Muntzing or to the subject matter or any part of it of the deposition taken of Mr. Brill by Applicant on April 20, 1972.

This request is related to the subject matter of the hearing scheduled to commence on May 17, 1972, and it is therefore requested that the documents be produced no later than May 8, 1972, in order to permit as careful an inspection as possible of the material contained therein.

REspectfully submitted,

A handwritten signature in cursive script, appearing to read "Anthony Z. Roisman".

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

Dated: May 2, 1972