

BEFORE THE
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In Camera

In the Matter of)

Docket No. 50-247

CONSOLIDATED EDISON COMPANY)
OF NEW YORK, INC.)
(Indian Point Station,)
Unit No. 2))

THE INTERROGATORIES CONTAINED HEREIN ARE
RELATED TO MATTERS TO BE CONSIDERED IN CAMERA
AND ARE AVAILABLE ONLY TO SUCH PERSONS
AS ARE AUTHORIZED TO SEE THEM BY DIRECTION OF
THE ATOMIC SAFETY AND LICENSING BOARD

December 22, 1971

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PDR ADGCK 05000247
G PDR

CITIZENS COMMITTEE FOR THE PROTECTION
OF THE ENVIRONMENT
INTERROGATORIES DIRECTED TO THE STAFF WITH REFERENCE
TO SUPPLEMENTAL STAFF TESTIMONY AT INDIAN POINT, UNIT NO. 2
HEARING DATED DECEMBER 14, 1971

1. Describe the minimum security plan which, in the Staff's judgment, is required for the protection of the public health and safety at the time the plant first reaches criticality. Provide similar information with respect to the minimum security required at the time the plant completes power ascension testing. Similarly, describe the minimum security needed one year from the time the plant achieves initial criticality.

2. Explain the basis for the Staff's judgment, as expressed in the supplemental testimony, for allowing the Applicant to achieve criticality, complete its testing program, and operate subsequent to achieving criticality, without having its full security plan implemented.

3. In light of the Applicant's reliance upon outside assistance in the event of an attempt to sabotage the plant, explain in detail your decision to permit criticality and some power ascension testing prior to the installation of door monitoring, alarm systems and the hot line telephone to the Peekskill Police Department.

4. With reference to the testimony of Mr. Madsen (on December 13, 1971), explain the basis upon which the Staff considered it permissible to consider the Applicant's construction schedule and security plan implementation schedule in determining what portions of the security plan needed to be operable prior to criticality, and/or completion of testing, and/or operation during the first year following criticality.

5. Both lighting of the perimeter fence and augmented electronic surveillance of the perimeter are proposed at the time at which plant criticality is achieved. Is it the Staff's position that the perimeter fencing and augmented guard force provide adequate security for the plant at that point? Describe the extent to which the Staff has considered the possibility that if the fence and the augmented guard force are adequate security, the perimeter lighting and augmented electronic surveillance may make the guard force overconfident and less vigilant and may even nullify the effectiveness of the guard force by disclosing their whereabouts at any given time.

6. Describe in detail the Staff review of the Applicant's security plan including the qualifications of the persons conducting the review, and the additional material examined by them in order to make the judgments with regard to the adequacy of the Applicant's security plan. For instance, to what extent did the Staff consider the incident at the linear accelerator (see In Camera transcript, December 13, 1971) in California in making its judgment to permit operation of the plant prior to installation of the electronic surveillance?

Respectfully submitted,

Anthony Z. Roisman (by G.K.)
Anthony Z. Roisman
Counsel for the Citizens Committee
for Protection of the Environment

December 23, 1971

BEFORE THE UNITED STATES

ATOMIC ENERGY COMMISSION

In the Matter of)

CONSOLIDATED EDISON COMPANY)
OF NEW YORK (Indian Point)
Unit No. 2))

Docket No. 50-247

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Interrogatories Directed to the Staff with Reference to Supplemental Staff Testimony at Indian Point, Unit No. 2 Hearing dated December 14, 1971, were mailed, postage prepaid, this 23rd day of December, 1971, to:

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