

Natural Resources Defense Council, Inc.

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December 1, 1971

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Washington, D. C. 20545

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

Dear Mr. Chairman:

Enclosed herewith is an Initial Statement of Contentions and Proposed Findings of Fact and Conclusions of Law of the Hudson River Fishermen's Association and the Environmental Defense Fund with respect to environmental issues. The contention and proposals are intended to provide the Board and the parties with guidance as to the development of our case. They are obviously subject to refinement, revision and addition based upon the subsequent submissions of the Staff and the evidence adduced at the hearing.

Virtually all of the proposed findings of fact contained in this statement are based upon data contained in documents prepared by the Applicant, answers to interrogatories supplied by Applicant and conversations with Applicant's employees and consultants during the course of discovery. Thus many of these proposed findings of fact are appropriate subjects for admissions pursuant to 10 CFR Part 2, Section 2.742. We intend to file such a request prior to the commencement of evidentiary hearings on the contested environmental issues.

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