

# Natural Resources Defense Council, Inc.

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October 30, 1972

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

In re: Consolidated Edison Company  
of New York, Inc.  
Indian Point Station Unit  
No. 2  
Docket No. 50-247

Dear Mr. Chairman:

In accordance with the schedule agreed on in this proceeding, the Intervenor, HRFPA and EDF, are filing with the Licensing Board today the following documents:

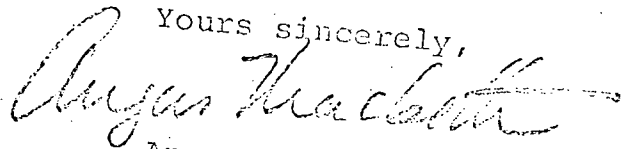
1. Intervenor's Answer to Summary of Con Edison's Position Concerning Environmental Issues.
2. Testimony of John R. Clark on Effects of Indian Point Units 1 and 2 on Hudson Aquatic Life.
3. Testimony of Eric Aynsley, Ph. D. on Alternatives to Once Through Cooling at Indian Point Unit No. 2.
4. Matters in Controversy Between Intervenor, Hudson River Fishermen's Association and Environmental Defense Fund, and the Regulatory Staff.
5. Outline Summary of Intervenor's Factual Position.

The matters in controversy between Intervenor and the Regulatory Staff are few in number since there is a basic agreement on the necessity of installing a closed cycle cooling system at Indian Point 2. A brief basis for the issues in controversy is provided to elucidate

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the Intervenor's position at this time. In addition, since it is anticipated that the Applicant will oppose the Staff's basic conclusion and the foundations on which it rests, the Outline Summary is supplied so that the thrust of the Intervenor's position will be clear to the parties and the Board. Intervenor's, of course, reserve the right to refine these statements in light of the other testimony filed in this proceeding and the agreed on schedule adopted by the parties.

Yours sincerely,



Angus Macbeth

AM/sp

Enclosures

cc: Mr. J. D. Bond  
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Board Panel