

UNITED STATES OF AMERICA  
ATOMIC ENERGY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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

CITIZENS COMMITTEE FOR  
PROTECTION OF THE ENVIRONMENT  
RESPONSE TO  
JUNE 26, 1974 ORDER

Plant Security

The Staff letter of July 12, 1974 indicates several areas in which further evidence is required:

1. The Staff should present evidence of an on-site inspection to verify full implementation of the security plan.
2. The Applicant should present evidence that it now has met Section 4.4.2 of ANSI-N18.17 with respect to all guards now used at the plant.
3. The Applicant should present evidence that it has written procedures to comply with Section 4.2.1 of ANSI-N18.17.
4. The Staff should identify the areas outside the plant considered by it and explain how they are secure from persons or items coming over, under or through the fence at places other than the gate.

Freezer-Dryer

The Staff Report (RO Inspection Report 50-247/73-18) does not settle, but perpetuates the freezer-dryer problem. It does not indicate the basis for the belief that the steps taken will solve the problem. Notably the original inspector has not provided an explanation of how his original conclusions that a total failure of the air system could occur and that the ESR would have to be received before the item was resolved are now changed.

At least the following issues remain:

1. Can a common cause result in failure of both freezer-dryer systems:
2. How long does it take for a freeze-up and could one occur between inspections?
3. What is the status of the ESR and its implementation?
4. How much have the present steps reduced the probability of a failure of the air system:
5. What has been the actual experience with the new system?
6. How much will the ESR fix improve plant safety?

Conclusion

Initially we believe these issues should be addressed on the merits by the parties in writing in the form of affidavits. From these submittals it can be determined whether there is need for an evidentiary hearing.

Respectfully submitted,

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

Berlin, Roisman & Kessler  
1712 N Street, N. W.  
Washington, D. C. 20036  
(202) 833-9070

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