

January 30, 1976

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )

CONSOLIDATED EDISON COMPANY )  
OF NEW YORK, INC. )

(Indian Point, Unit No. 1) )  
(Indian Point, Unit No. 2) )  
(Indian Point, Unit No. 3) )

Docket No. 50-3  
Docket No. 50-247  
Docket No. 50-286

STAFF MOTION FOR PRODUCTION AND INSPECTION OF DOCUMENTS  
IN THE POSSESSION OF THE CITIZEN'S COMMITTEE  
FOR PROTECTION OF THE ENVIRONMENT

On January 16, 1976, the Citizen's Committee for Protection of the Environment (CCPE) answered interrogatories propounded by the NRC Staff (Staff). CCPE designated Dr. Mihailo Trifunac, California Institute of Technology, to testify on the issues of appropriate ground acceleration value produced by the Safe Shutdown Earthquake.

In accordance with 10 CFR §2.741, the Staff requests production of the following documents in the possession of Dr. Trifunac which are relevant to his computations and permission to inspect those documents:

1. All plots and documents used in derivation of the Trifunac and Brady relationship between acceleration and intensity.

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2. All documents relating to Dr. Trifunac's choice of a normal, rather than a log-normal distribution for acceleration data.
3. All documents relating to Dr. Trifunac's choice of log-linear regression on means of acceleration as opposed to simple log-linear regression on the data set.

The Staff requests that the documents described above be produced by CCPE and that the Staff be permitted to inspect such documents during the normal business hours on or before February 27, 1976, or at such time or place mutually convenient to the parties.

Respectfully submitted,



Colleen K. Nissl  
Counsel for NRC Staff

Dated at Bethesda, Maryland,  
this 30th day of January, 1976.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NOTICE OF APPEARANCE, NRC STAFF INTERROGATORIES TO NYSAEC, and STAFF MOTION FOR PRODUCTION AND INSPECTION OF DOCUMENTS IN THE POSSESSION OF THE CITIZEN'S COMMITTEE FOR PROTECTION OF THE ENVIRONMENT," in the above-captioned matter have been served on the following by deposit in the United States mail, first class or air mail, this 30th day of January, 1976.

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Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Washington, D.C. 20555

Atomic Safety and Licensing  
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