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January 30, 1976

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50-247

Carmine J. Clemente, Esq.
New York State Atomic
Energy Council
Department of Commerce
99 Washington Avenue
Albany, New York 12245

Re: Indian Point Seismic
Proceeding

Dear John:

In accordance with the Appeal Board's Order of
January 14, 1976, I enclose "Con Edison's Written
Interrogatories to New York State Atomic Energy Council".

Sincerely yours,

Patrick K. O'Hare

Patrick K. O'Hare

Enclosure
cc w/enc:

Michael C. Farrar, Esq.
Dr. John H. Buck
Atomic Safety and Licensing
Appeal Panel
Dr. Lawrence R. Quarles
Frederic S. Gray, Esq.
Hon George V. Begany
Hendrick Hudson Free
Library
David S. Fleischaker, Esq.
Secretary, U.S.N.R.C.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
)
CONSOLIDATED EDISON COMPANY) Docket Nos. 50-3
OF NEW YORK, INC. and) 50-247
POWER AUTHORITY OF THE) 50-286
STATE OF NEW YORK) (Show Cause - Seismic)
(Indian Point Station,)
Units 1, 2 and 3))

CON EDISON'S WRITTEN INTERROGATORIES
TO NEW YORK STATE
ATOMIC ENERGY COUNCIL

Pursuant to the Appeal Board's Order of January 14, 1976, Consolidated Edison Company of New York, Inc. ("Licensee") requests that the New York State Atomic Energy Council ("the State") answer, under oath or affirmation, in accordance with 10 C.F.R. § 2.740b(1975), the following interrogatories:

1. With respect to the State's answers to Licensee's interrogatories served November 17, 1975, Nos. 7, 9, list each of the "recently published, well documented acceleration vs. intensity relationships" that the State contends should be used to determine correct Safe Shutdown Earthquake accelerations for the site. With respect to each one so listed, state the author(s), title, and citation of each publication setting forth or supporting such relationship.

2. State your contention regarding the validity and applicability of the Coulter, Waldron and Devine acceleration v. intensity relationships reported in the following publication: Coulter, Waldron, & Devine, "Seismic and Geologic Siting Considerations for Nuclear Facilities", Fifth World Conference on Earthquake Engineering, Rome, Italy, 1973.

3. State your contention regarding the validity and applicability of the acceleration v. intensity relationships discussed in each of the studies listed in Attachment B to CCPE's answers to Licensee's interrogatories served November 17, 1975.

Respectfully submitted,

Le Boeuf, Lamb, Leiby & MacRae

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Attorneys for Consolidated Edison
Company of New York, Inc.

January 30, 1976

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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(Indian Point Station,)
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CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of
January, 1976 served the foregoing document entitled
"Con Edison's Written Interrogatories to New York State
Atomic Energy Council" by mailing copies thereof, first-
class postage prepaid and properly addressed, to the
persons listed below:

Michael C. Farrar, Esq.
Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Dr. Lawrence R. Quarles
Atomic Safety and Licensing
Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Dr. John H. Buck
Atomic Safety and Licensing
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Frederic S. Gray, Esq.
Acting Assistant Chief
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Atomic Safety and Licensing
Appeal Panel
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Roisman, Kessler and Cashdan
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Secretary
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555
Attention: Chief, Docketing
and Service Section (21)


Patrick K. O'Hare

LeBOEUF, LAMB, LEIBY & MacRAE
Attorneys for Consolidated Edison
Company of New York, Inc.