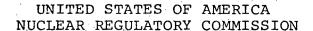
LAW OFFICES OF LEBOEUF, LAMB, LEIBY & MACRAE 1757 N STREET, N. W. WASHINGTON, D. C. 20036 140 BROADWAY ARVIN E. UPTON NEW YORK, N.Y. 10005 LEONARD M. TROSTEN WILLIAM O. DOUB January 30, 1976 WASHINGTON TELEPHONE EUGENE B. THOMAS; JR. 202-457-7500 HARRY H. VOIGT L. MANNING MUNTZING CABLE ADDRESS LEX K. LARSON LALALU, WASHINGTON D.C. HENRY V. NICKEL TELEX: 440274 JAMES P. MCGRANERY, JR. WASHINGTON PARTNERS Carmine J. Clemente, Esq. New York State Atomic Energy Council Department of Commerce 99 Washington Avenue Albany, New York 12245 Indian Point Seismic Re: 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, Patrice K. O'Have Patrick K. O'Hare Enclosure Michael C. Farrar, Esq. cc w/enc: 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. 8111140004 760130 PDR ADDCK 05000247



## 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, Ramb, Leiby of Mac Rac

LeBOEUF, LAMB, LEIBY & MacRAE 1757 N Street, N.W. Washington, D. C. 20036 (202) 457-7500

Attorneys for Consolidated Edison Company of New York, Inc.

January 30, 1976

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of	<b>)</b>
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)	)

## 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. John H. Buck
Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Atomic Safety and Licensing Appeal Panel 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

Frederic S. Gray, Esq.
Acting Assistant Chief
Hearing Counsel
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Hon. George V. Begany Mayor, Village of Buchanan Buchanan, New York 10511 Hendrick Hudson Free Library 31 Albany Post Road Montrose, New York 10548

David S. Fleischaker, Esq. Roisman, Kessler and Cashdan 1712 N Street, N.W. Washington, D. C. 20036 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.