

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
CONSOLIDATED EDISON)	DOCKET NO. 50-247
COMPANY OF NEW YORK,)	
INC.)	(Extension of Interim
)	Operation Period)
(Indian Point Station)	
Unit No. 2))	

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STATEMENT OF CONTENTIONS
BY THE NEW YORK STATE ENERGY OFFICE*

This Statement of Contentions is made in response to the Board's request at the pre-hearing conference held on October 27, 1976 (NRC No. 50-247, Transcript of Pre-hearing Conference, October 27, 1976, page 91 ("Tr. _____")).

It is the State's position that the applicant should address the following issues when it responds to Board Member Briggs' request for information (Tr. 66-67) at the hearing scheduled to begin on December 7th:

1. Entrainment mortality. Define and present data supporting the estimates of mortality; explain how these estimates are utilized in the "model"; and explain what the effects of these refined estimates will be on the output of the "model."
2. Compensation. Discuss plans to review the compensation mechanism used in the existing "model"; explain how the existing data and the "new" data will be used to validate the parameter values; explain the anticipated changes in these parameters; determine the effects of these changes on the "model" impacts; and explain the techniques and methodology employed to justify the compensation values used.

*Effective August 25, 1976, the New York State Energy Office assumed all of the functions and responsibilities of the New York State Atomic Energy Council, pursuant to Chapters 819-821 of 1976 Laws of New York.

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3. "f" factors. Explain how all the data, particularly data not previously analyzed, are expected to influence the "f" factors currently being employed; and explain how the expected changes in the "f" factors are going to influence the impact analysis for the Indian Point project.
4. Contribution to Mid-Atlantic Fishery. Discuss the data and analyses used to determine the Hudson River contribution to the Mid-Atlantic Striped Bass Fishery; define what is meant by the Mid-Atlantic Fishery; and discuss the anticipated percent contribution of Hudson River Striped Bass to the Mid-Atlantic Fishery.
5. General. Discuss the results of performing verification and sensitivity analyses for the major parameters of the "model."

After the State has evaluated the testimony presented on all the foregoing issues, the State will take a position as to whether or not the applicant's request for an extension of operation with once through cooling should be granted.

Respectfully submitted,

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Dated: November 22, 1976
Albany, New York