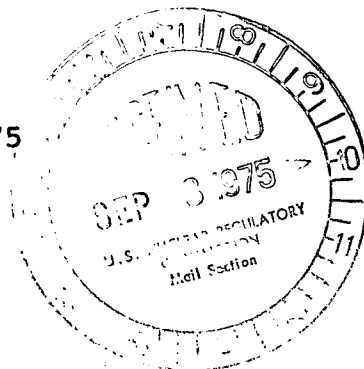


Carl L. Newman
Vice President

Consolidated Edison Company of New York, Inc.
4 Irving Place, New York, N. Y. 10003
Telephone (212) 460-5133

September 4, 1975

Mr. George W. Knighton
Chief, Environmental Projects Branch #1
Directorate of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Re: Indian Point 2 - Docket No. 50-247

Dear Mr. Knighton:

Enclosed for your information are six copies of report entitled "Indian Point No. 2 Routine Monthly Thermal Monitoring - Report No. 3 Supplement - July 1974" prepared by Con Edison. Since the plant was not operating during most of the time the temperature measurements were taken, the report is not a report of operations within the meaning of the license and the Environmental Technical Specification Requirements. This report was intended to ascertain natural temperature patterns in the Hudson River with little or no influence from the station's thermal discharge.

Also enclosed is a copy of my letter to Mr. Thomas Quinn of the New York State Department of Environmental Conservation requesting an interpretation of the applicability of New York Thermal Criteria to the Indian Point discharge in view of the findings contained in the enclosed report.

Very truly yours,

Carl L. Newman
Carl L. Newman

Encs.

cc: Dr. Richard Rush (2)

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August 13, 1975

Mr. Thomas Quinn
Acting Assistant Director
Bureau of Industrial Programs
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Re: Indian Point 2
§ 401 Certification

Dear Mr. Quinn:

In accordance with the water quality certification dated September 24, 1973 and issued to Con Edison for Indian Point Unit No. 2 pursuant to section 401 of the Federal Water Pollution Control Act, Con Edison is required to conduct routine thermal monitoring surveys. Con Edison has submitted the results of surveys for the months of May, June and July 1974. In those surveys Con Edison and its contractor had to determine ambient temperatures, i.e., the temperature of the water that existed prior to the addition of heat of artificial origin, in order to make comparisons with thermal criteria as defined in section 704.2 of the Department's regulations.

Con Edison undertook an additional thermal monitoring survey in July 1974, when Indian Point Units 1 and 2 were both out of service for a substantial period of time in order to observe the natural temperature patterns occurring in the Hudson River in the vicinity of Indian Point. A copy of the report of that survey is enclosed.

The report indicates that the present guidance of the State, in regard to determining the estuarine temperature that existed prior to the addition of heat of artificial origin (ambient) is unclear where there are substantial natural spatial and temporal surface temperature variations. These variations result in uncertainty in relating ambient temperatures measured beyond the reach of the plume to those within the plume itself for purposes of determining compliance with thermal criteria. The report concludes that a more precise estimation of the intensity and extent of the thermal plume can be realized if the assessment is based on measurements taken at a three-foot depth. The upper three

Mr. Thomas Quinn

August 13, 1975

feet of the water column in the vicinity of Indian Point are less than 8% of the total water column.

Con Edison therefore requests that the Department clarify the applicability of the thermal criteria to Indian Point by way of interpretation or modification. Con Edison suggests that for purposes of the criteria set forth in section 704.2(b)(5), the "surface" measurements for purposes of sub-divisions (ii), (iii) and (iv) be taken at a three-foot depth. Measurements for purposes of sub-division (i) would be taken within one foot of the top of the water column. Further, measurements of ambient temperature for purposes of comparison with the criteria of section 704.2(b)(5), would be taken at a three-foot depth.

Con Edison will be pleased to consult with the Department to discuss this request and the information contained in the enclosed report.

Very truly yours,

Carl Newman

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Encl.