

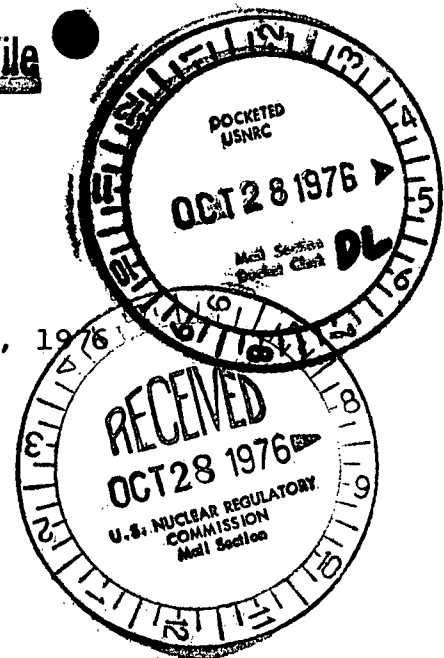
William J. Cahill, Jr.  
Vice President

## Regulatory Docket File

Consolidated Edison Company of New York, Inc.  
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October 25, 1976

Director of Nuclear Reactor Regulation  
ATTN: Director, Division of Site Safety  
and Environmental Affairs  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Re: Indian Point 2 - Docket No. 50-247  
Proceeding for Extension of Operation  
With Once-Through Cooling

Dear Sir:

Consolidated Edison Company of New York, Inc. (Con Edison) wishes to supplement its letter to you dated August 30, 1976, containing its comments on the Draft Environmental Statement in the above matter.

The Statement presents Figure 3-1 on page 3-3 for the purpose of showing that the incremental impacts of the proposed license amendment (the shaded area in Figure 3-1) are negligible. In view of this favorable conclusion, Con Edison did not comment on the Figure (or Table 3-1). In order to eliminate any misunderstanding concerning our failure to comment, we would like to note Con Edison's position with respect to Table 3-1.

Properly interpreted, the Table stands for the proposition that assuming the worst possible environmental impact, the impact of the requested extension of time is negligible. We disagree with the magnitude shown as a reduction in relative yield as depicted on that figure. The major purpose of the extension request is to allow time for Con Edison's presentation of data which shows that the staff model which was used to generate this curve grossly overstates adverse impacts. We believe the principal errors in the model are as follows:

1. Although some changes have been made in the model since the Indian Point 2 proceeding, the model retains

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important features which were criticized by the Appeal Board in the Indian Point 2 hearing when the Appeal Board held that Con Edison's model more nearly conformed to reality and was superior.

2. Although the staff agrees to the existence of compensatory mechanisms in the striped bass population, the compensatory factor was specified so that compensation had no effect on the model results.

3. The model runs depicted in Table 3-1 assume that Indian Point 1, Bowline, Lovett, Roseton and Danskammer are all operating continuously at full power with once-through cooling through 2010. This is a gross error because some of these plants will be retired before that time, and plants never operate continuously at full power. Also, some of these plants have been in existence for many years and are properly considered as background for Indian Point 2. Finally, we note that Table 3-1 on page 3-4 of the DES indicates that the Albany and 59th Street Plants are included in the calculation. Con Edison is familiar with the 59th Street Plant, and any suggestion that there are entrainment problems at this plant is erroneous, and we have never observed any impingement problem.

Very truly yours,



William J. Cahill, Jr.  
Vice President

WJC:rc

cc: Distribution

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