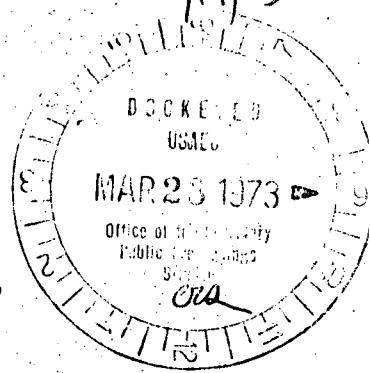


3/19/73

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION



In the matter of)
)
CONSOLIDATED EDISON OF)
NEW YORK, INC.)
)
(Indian Point Nuclear Reactor)
Unit #3)

Docket No. 50-286

AMENDED PETITION FOR LEAVE TO INTERVENE IN
RESPONSE TO THE ORDER OF THE SPECIAL ATOMIC
SAFETY AND LICENSING BOARD DATED FEB. 28, 1973

Cortlandt Conservation Association, Inc. makes the following response because it wishes to retain full rights as an intervenor in spite of the confusion attendant on the absence of a ruling on a motion to consolidate this proceeding with Indian Point #2. REPRESENTATION NO. 1. Since filing on November 22, 1972 a "Request for Hearing and Petition for Leave to Intervene," the record necessary to prepare an Intervention and an Amended Petition has received important additional information such as the "Summary Report of Reinspection and Appraisal of the Indian Point No. 3 Reactor Pressure Vessel Subsequent to Hoist Failure on January 12, 1971," which appeared in the Public Document Room March 2, 1973.

2. By premature attempt to render a decision on an operating license so far in advance of the completion of the facility, the public is deprived of its rights to an examination of all pertinent data.

3. The Docket 50-286 in the Atomic Energy Commission Special Document Room is incomplete

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4. The Cortlandt Conservation Association has no funds to retain competent counsel,

if such were available, and has unsuccessfully searched for pro bono publico legal assistance in amending its petition.

5. The intent of the Atomic Energy Commission Act of 1954 and the frequent statements by AEC Commissioners has been to welcome the full participation of the public in matters of licensing nuclear power stations, but the effect of Rules of Practice and AEC regulations and procedures has been to thwart the public and make it impossible for these rights to be preserved.

6. In order to abide by the law, the AEC and the Applicant is hereby requested to provide funds or appoint competent counsel to assist Cortlandt Conservation Association Inc. in protecting its rights in this proceeding.

7. Petitioner intends to bring the apparent conspiracy on the part of the Atomic Energy Commission and Applicant Utilities to abridge the public's rights to full participation in licensing matters by procedure, not by fact, to the attention of the appropriate courts, the American Bar Association and The President of The United States, unless relief is granted by this special Atomic Safety & Licensing Board.

8. The original petition set forth unmistakably the manner in which the interest of the petitioner and its members, many of whom live in close proximity to the nuclear plants, would be effected by the operation of Indian Point #3.

9. Operating licenses for all nuclear power plants should be held in abeyance until there is a final Rule-Making document available for the study of the Consolidated National Intervenors in the case of RM-50-1 (ECCS) and RM 50-2 (ALAP).

10. A Draft Environmental Statement in the ALAP Rule Making Action, dated January 1973, on page 5.33 indicates that the addition of cooling towers, which will be required for the operation of Indian Point #3, precludes the possibility of meeting new announced guidelines for limiting radioactive discharges by any existing technology.

WHEREFORE, Petitioner requests continuance of status as Intervenor and a prompt response to this Amended Petition.

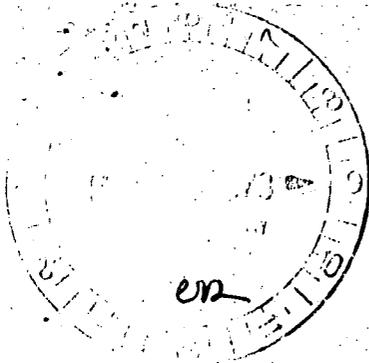
March 19, 1973.

CORTLANDT CONSERVATION ASSOCIATION INC.

By

Laura S. Seitz

Laura Seitz, President
44 Cleveland Drive
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REG. & U.S. PAC. 50-286

BEFORE THE UNITED STATES
ATOMIC ENERGY COMMISSION

In the Matter of)
)
Consolidated Edison Company)
of New York, Inc.)
Indian Point Unit No. 3)

Docket No. 50-286

CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of March served copies of the document entitled "Amended Petition of Cortlandt Conservation Association" in the above-captioned matter, by mailing copies properly addressed to the following persons:

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