

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )  
 )  
CONSOLIDATED EDISON COMPANY )  
OF NEW YORK ) Docket No. 50-286  
 )  
(Indian Point, Unit No. 3) )

MOTION FOR LEAVE TO FILE  
A BRIEF AMICUS CURIAE

Citizens Committee for Protection of the Environment has sought a hearing to determine whether the operating licenses for Indian Point #1 & 2 and construction permit for Indian Point #3 should be revoked, modified or suspended in light of newly discovered evidence regarding the seismicity of the Indian Point site. It is obviously interested in the possible issuance of an operating license for Indian Point #3 and believes it should have an opportunity to argue to the Appeal Board why the resolution of the seismic issue in a unified hearing for all Indian Point plants should precede the issuance of a full-term operating license for Indian Point #3. No party to the proceeding will represent the CCPE position. CCPE does not request an opportunity for oral argument and the brief it proposes to file is short and within the deadlines set in ALAB-278.

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PDR ADOCK 05000286  
G PDR

For these reasons CCPE requests permission to file the attached brief.

Respectfully submitted,

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Dated: June 30, 1975

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of )

CONSOLIDATED EDISON COMPANY OF )  
NEW YORK, INC. )

(Indian Point Nuclear Generating )  
Station, Unit No. 3) )

Docket No. 50-286

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S RESPONSE TO THE ATOMIC SAFETY AND LICENSING APPEAL BOARD ORDER OF JUNE 20, 1975," in the above-captioned matter have been served on the following by deposit in the United States mail, first class or airmail, this 30th day of June, 1975:

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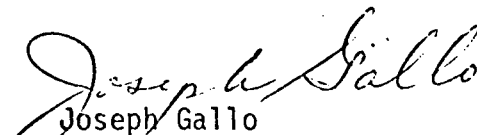
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