

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
CONSOLIDATED EDISON COMPANY OF) Docket Nos. 50-3
NEW YORK, INC.) 50-247
(Indian Point Station,)
Units Nos. 1 and 2))
AND)
POWER AUTHORITY OF THE STATE) Docket No. 50-286
OF NEW YORK)
(Indian Point 3 Nuclear Power Plant)

APPLICATION FOR AMENDMENT TO OPERATING LICENSES

Pursuant to Section 50.90 of the regulations of the Nuclear Regulatory Commission, Consolidated Edison Company of New York, Inc. ("Con Edison"), as holder of Provisional Operating License No. DPR-5 and Facility Operating License No. DPR-26, and the Power Authority of the State of New York ("Power Authority"), as holder of Facility Operating License No. DPR-64, hereby apply for an amendment to the Environmental Technical Specification Requirements ("ETSR") contained in Appendix B to each license.

This Application concerns the Environmental Surveillance Program, "Thermal Plume Mapping," contained in ETSR Section 4.1.1.a. Also affected, by reference to Section 4.1.1.a, are Sections 2.1.1, 2.1.2, 3.1, 3.1.1, 3.1.2, 3.2.2.3, 5.6.1.2 A.c. [Indian Point 1 and 2] and 5.6.1b.(1)(c) [Indian Point 3].

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In this Application we propose that all elements of the ETSR related to Thermal Plume Mapping be consolidated in Section 4.1.1.a. We also propose that Section 4.1.1.a be revised to refer to the conditions of the New York State Certification issued by the Department of Environmental Conservation ("DEC") pursuant to Section 401 of the Clean Water Act. This would permit substantial simplification of Section 4.1.1.a without changing the scope of the continuing survey program set forth in the 401 Certification. Furthermore, this change would obviate the need for future changes to conform with any 401 Certification changes which might be made by the DEC. NRC will continue to be provided with all reports submitted to DEC concerning the Thermal Plume Mapping Program.

No environmental impacts would occur as a result of these proposed modifications because no change is requested in the conditions related to plant operation.

Attachment A to this Application describes the bases for the specific amendment request. Attachment B to this Application contains revised pages of the ETSR that reflect the amendment request. Attachment C to this Application is an environmental impact evaluation of the changes proposed in the Application.

This request has been reviewed and approved by Con Edison's Environmental Protection Committee and by the Power Authority's Plant Operating Review Committee and its Safety

Review Committee. It involves no change in plant operations at Indian Point, no change in environmental effects related to plant operations and no change in types and amounts of effluents from the site.

Subscribed and Sworn to before me this 12th day of April 1979

Angela Roberti
Notary Public
ANGELA ROBERTI
Notary Public, State of New York
No. 41-8593813
Qualified in Queens County
Commission Expires March 30, 1980

CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.

BY William J. Cahill, Jr.
William J. Cahill, Jr.
Vice President

Subscribed and Sworn to before me this 10th day of April 1979

Ruth G. Zapp
Notary Public
RUTH G. ZAPP
Notary Public, State of New York
No. 30-4663428
Qualified in Nassau County
Commission Expires March 30, 1980

POWER AUTHORITY OF THE STATE
OF NEW YORK.

BY [Signature]

ATTACHMENT A
BASES FOR AMENDMENT REQUEST

On May 2, 1975, the New York State Department of Environmental Conservation ("DEC") issued a certification for Indian Point Unit No. 3 pursuant to Section 401 of the Clean Water Act. This certification is also applicable to Indian Point Units Nos. 1 and 2.

The DEC 401 Certificate contains the requirements for the thermal plume mapping program. In order to eliminate unnecessary duplication of regulatory provisions, Con Edison and the Power Authority are proposing that the Nuclear Regulatory Commission ("NRC") amend its licenses for the Indian Point plants with respect to the provisions of the Environmental Technical Specification Requirements ("ETSR") dealing with the thermal plume mapping program.

This elimination of unnecessary and duplicative material can be achieved by adding to the ETSR direct reference to the thermal survey conditions of the DEC 401 Certificate and deleting from the text of the ETSR material contained in the DEC 401 Certificate and the Official Compilation of Codes, Rules and Regulations of the State of New York, and references to reports already submitted in satisfaction of certification requirements, as well as additional duplicative material.

Sections 2 and 3 of the ETSR contain references to the Thermal Plume Mapping portions of the ETSR. These references are inappropriately placed because thermal surveys, which are environmental surveillance functions, are not limiting conditions of operation or plant monitoring requirements. Monthly routine thermal surveys are required for a prescribed period and involve the use of specialized equipment and specially trained personnel. Intensive surveys, which are expanded routine surveys, are required until the relationship of the plants' combined discharge to New York State water quality criteria is established. Neither of these efforts should be viewed as a plant limiting condition of operation or plant monitoring requirement which is suggested currently by their inclusion in ETSR Sections 2 and 3. Details of the bases for the changes sought in each section referred to in the Application are described below.

Section 2.1.1.3 should be deleted. This specification is not a limiting condition of operation because:

- 1) a determination of compliance with New York State thermal criteria will be based on the results of the completed survey program and cannot be readily determined based on plant operating conditions;

- 2) if the Thermal Plume Mapping portions of the ETSR are modified, quotation of the State thermal criteria would be

deleted and reference to them in Section 2.1.1.3 would be unnecessary.

The bases of Section 2.1.1 and 2.1.2 should be modified. The last sentence of the first paragraph on page 2.1-6 and the last sentence of the bases on page 2.1-9 refer to New York State thermal criteria presented in Section 4.1.1.a. The reference to Section 4.1.1.a would be deleted consistent with deleting from Section 4.1.1.a quotations from the criteria.

The monitoring requirements of Section 3.1 are intended to insure that the limiting conditions for operation are maintained. Plant personnel measure and record variables associated with plant operations, the station CWS intakes and station effluents. At locations outside the physical limits of the Indian Point site measurements taken in the river are governed by requirements developed under the thermal plume mapping program specified in Section 4.1.1.a. Therefore the monitoring requirements of Section 3.1 of the ETSR duplicate requirements of Section 4.1.1.a where they involve requirements outside the site and should be deleted.

Objective A. of Section 3.1 concerns thermal releases in the river and are assessed under the thermal plume mapping program, not as part of the site monitoring program. Therefore objective A should be deleted.

In Section 3.1.1.4 the sentence beginning "The maximum surface temperature..." should be deleted. The monitoring referred to during thermal surveys is not done during any other periods of plant operations and is not designed to be a continuous operational monitoring program. At the completion of the thermal survey program there should be sufficient data for the purpose of calibrating models capable of determining whether or not there is compliance with the State thermal criteria at all times.

Section 3.1.2.3 should be substantially modified. We believe the reference in this section to "a correlation between the maximum temperature in the discharge canal and the maximum surface temperature of the plume" duplicates the intent of the thermal survey to determine whether or not plant operations raise surface river water temperatures above 90 degrees F. The correlation presently specified is outside the scope of operational monitoring and is not a plant operating responsibility. Once the effect of plant operation is determined and predictive models calibrated the intent of this section can be achieved.

In Section 3.2.2.3 the relationship between plant operations and characteristics of the thermal discharge referred to in the first sentence is among the subjects for determination in the thermal plume mapping program and should be deleted from Section 3.0 monitoring requirements.

Section 4.1.1.a, "Thermal Plume Mapping", would be substantially modified and condensed. The entire program as it is presently conducted is addressed in the 401 Certification in Conditions III.C.3 and III.C.4.

Section 5.6.1.2.A.c [Indian Point 1 and 2] and Section 5.6.1b.(1)(c) [Indian Point 3] refer to the reporting requirements for the Thermal Plume Mapping Program in Section 4.1.1.a.4. The reference consistent with this proposed ETSE amendment would be to Section 4.1.1.a.1.

ATTACHMENT B

REVISED PAGES OF ENVIRONMENTAL
TECHNICAL SPECIFICATION REQUIREMENTS

2.0 LIMITING CONDITIONS FOR OPERATION

General: During a national power emergency, regional emergency, reactor emergency or an emergency need for power the limiting conditions for operation (LCO) provided in these Environmental Technical Specifications shall be inapplicable. During such emergencies, however, the LCO shall not be exceeded except as is necessitated by the emergency.

Applicability

Applies to the controlled release of thermal discharges, total residual chlorine and other chemical discharges, radioactive liquid, gaseous waste effluents and solid waste from the Indian Point Station.

Objective

To define the conditions for controlled release of nonradioactive and radioactive liquids and nonradioactive solids to the Hudson River and nonradioactive and radioactive gases to the atmosphere in order to assure compliance with applicable Federal and State regulations and to limit the stress to the aquatic ecosystem that might be caused by the discharge of excess concentrations or heat.

2.1

THERMAL

Applicability

Applies to the discharge of the heated water from the discharge structure.

3.0 MONITORING REQUIREMENTS

Applicability

Applies to routine sampling and analysis of the Station effluents and to an analytical evaluation of the data collected from the environmental monitoring survey.

Objective

To establish a sampling and analysis program which will assure that all effluents are kept within applicable Federal and State regulations.

3.1

THERMAL

Applicability

Applies to temperature measurements made in the intake forebays, and inside the discharge canal.

2.0 LIMITING CONDITIONS FOR OPERATION

Objective

To define the conditions for discharge of the heated water to assure compliance with applicable Federal and State regulations and to limit stresses to the aquatic ecosystem.

2.1.1 Maximum ΔT_c Across Circulating Water System (CWS) 3.1.1

Objective

To limit the maximum temperature rise across the CWS during full and reduced flow at all power levels.

Specification

2.1.1.1 The maximum temperature rise across the CWS shall not exceed the following temperature differentials, subject to the conditions of Section 2.1.2:

- (a) 17F° when the CWS is operating at full flow and normal operation, or
- (b) 28F° when the CWS is operating at reduced flow, or

3.0 MONITORING REQUIREMENTS

Objective

- A. To assure that thermal protection conditions, including the temperature difference across the circulating water system discharge temperature, and rate of temperature change, are maintained within the Environmental Technical Specifications.

Maximum ΔT_c Across Circulating Water System (CWS)

Objective

To monitor the intake and discharge temperatures at all power levels to assure that the allowable ΔT_c across the CWS is not exceeded.

Specification

- 3.1.1.1 The individual intake water temperatures along with the discharge canal water temperature shall both be continuously monitored and recorded. The intake water temperature shall be measured at a depth representative of the average intake temperature in a forebay of an intake for each Unit. The average temperature of the individual intake temperatures shall be calculated.

2.0 LIMITING CONDITIONS FOR OPERATION

2.1.1.1 Specification (Cont'd)

- (c) 31F° when the CWS is operating at reduced flow and one or more of the circulating water pumps is down for maintenance or pump outage, or
- (d) 31F° when the CWS is operating at reduced flow and 10% of the normal condenser discharge is recirculated to the inlet for deicing purposes, or
- (e) 38F° when the CWS is operating at reduced flow and 20% of the normal condenser discharge is recirculated to the inlet for deicing purposes.
- (f) Item (a) above becomes 19F° when heater or preheater drains empty directly into condenser or during periods of high air in-leakage into condenser.
- (g) The limits specified in this Section may be exceeded if one or more of the circulating water pumps are down for maintenance or pump outage.

2.1.1.2 Whenever the temperature increment (ΔT_c) is above the specified limits in Section 2.1.1.1 for more than 6 hours, an investigation shall be undertaken to determine the cause for the temperature increase and corrective action shall be taken to reduce the ΔT_c to within the specified limits within 24 hours. These occurrences with corrective action shall be recorded and reported in accordance with Section 5.6:2.1.b.

3.0 MONITORING REQUIREMENTS

3.1.1.2 The discharge canal water temperature shall be obtained by means of a probe located in the discharge canal before the confluence with the river, at a depth of 5.5 feet below mean low water (see Figure 2.1-1 for location of probes).

3.1.1.3 Methods of measurement shall include temperature sensors (RTDs) with an accuracy of $\pm 0.5^\circ\text{F}$ and a sensitivity of 0.1°F . Temperature data from permanent RTDs shall be readout on a recorder in the control room. A three way switch shall be used to select the individual intake temperatures for recording purposes. The difference in output of the sensor at the discharge canal from the average of the individual intake temperatures, i.e., the ΔT_c across the CWS, shall be recorded on a daily basis and reported in accordance with Section 5.6.1.1, Annual Environmental Operating Report. A strip chart record shall be kept for examination and the daily minimum, maximum and average values of the ΔT_c shall be reported.

3.1.1.4 Continuous temperature monitoring is required following changes in power level, during reduced flow and deicing operations until the ΔT_c across the CWS is stable within 5% of the expected value. Monitoring during all flow conditions shall be carried out by continuously measuring and recording information as to the heat load, the intake and discharge canal water temperatures, and the maximum ΔT_c across the CWS. The flow rate through the CWS shall be logged each day and any changes recorded at the time of the change. The operating conditions measurements, flow rates and results are to be reported in accordance

2.0 LIMITING CONDITIONS FOR OPERATION

Specifications (Cont'd)

Bases

The rise of intake water temperature condenser is a fixed value based on condenser design, condenser cleanliness,

3.0 MONITORING REQUIREMENTS

3.1.1.4 Specification (Cont'd)

with Section 5.6.1.1, Annual Environmental Operating Report.

3.1.1.5 The continuous temperature recorder shall not be inoperative for a period exceeding 14 days. As an alternative during the monitoring or recording system downtime for calibration or repairs, manual temperature readings in the intake structure and in the discharge canal in the location 2 in Figure 2.1-1 shall be obtained and recorded once during each shift.

Temporary malfunction of temperature monitoring systems shall not be restrictive on plant operations, providing manual temperature measurements are taken.

3.1.1.6 There shall be an annual channel calibration of the sensor systems and a monthly channel functional test of the sensor systems.

3.1.1.7 Deviations from this monitoring program shall be promptly reported in accordance with Section 5.6.2.1.a.

Bases

Temperature monitoring sensors (RTDs) in the forebay of the intake and inside the discharge canal at the confluence with the Hudson River

2.0 LIMITING CONDITIONS FOR OPERATION

Bases (Cont'd)

the intake water temperature is less than 40°F, the flow will be reduced from 100% flow to 60% flow for Units Nos. 1 and 2, thereby resulting in an increase in the temperature differential across the CWS. This flow reduction was required by the New York State Department of Environmental Conservation in an agreement made with Consolidated Edison on April 28, 1972, to rescind an Order by the State on February 29, 1972, to shut down the circulating water pumps after a fish kill occurred at the intake structure during testing of the pumps for Unit No. 2. The purpose of flow reduction is to reduce the volume of river water used and the intake velocity through the outer fixed screens to reduce fish impingement during wintertime. Flow at Unit No. 3 will also be reduced to minimize impingement effects when the intake river water temperature is less than 40°F as required in Specification 2.2.1.2. Flow may also be reduced when the intake water temperatures are greater than 40°F, provided the temperature conditions of the New York State thermal criteria are maintained.

Since the temperature differential increases with reduced flow, maintenance requiring pump shutdown should be avoided during the summertime (when the ambient water temperature can reach 79°F) in order to avoid excessive thermal stresses on aquatic biota.

During the winter, warmed water from the discharge canal can be recirculated to the intake forebay of Unit No. 3 for deicing purposes to melt

3.0 MONITORING REQUIREMENTS

Bases (Cont'd)

During reduced flow when the intake water temperature is greater than 40°F, an increased temperature differential across the CWS will result in increasing the surface temperature of thermal discharges. Besides the thermal effects on biota as they pass through the condensers, organisms which are in the river water will also be exposed to the thermal plume, and during reduced pump capacities at the same heat load, they will be exposed to higher temperatures than otherwise. During periods when the ambient river water temperatures reaches about 79°F, many organisms will be living near their upper critical temperatures and probably above their thermal range of metabolic insensitivity. Thus to avoid changes in species composition or the biotic community, operation during reduced pump capacities, when the ΔT_c can be 28°F, will be limited by the maximum discharge canal water temperature of 98°F. Therefore operation with reduced flow is limited.

2.0 LIMITING CONDITIONS FOR OPERATION

Specification (Cont'd)

- 2.1.2.2 If this temperature is exceeded for two (2) hours, corrective action shall be taken to restore compliance with specifications unless there exists an emergency need for power.
- 2.1.2.3 When the discharge canal head differential is less than 1.5 feet for more than two (2) hours, the maximum temperature in the discharge canal shall not exceed 90°F. See Specification 2.2.2.2.
- 2.1.2.4 Deviation from the specifications for more than 24 hours shall be promptly reported in accordance with Section 5.6.2.1.a.

Bases

The analysis is based on the assumption that the maximum ambient temperature is 79°F and the maximum effect of recirculation on the intake temperature, from the tidal influence of the estuary, is a temperature differential

3.0 MONITORING REQUIREMENTS

Specification (Cont'd)

- 3.1.2.2 Temperatures in the discharge canal will be transmitted to the same control room as that of the intake and daily maximum, minimum and average temperatures reported in accordance with Section 5.6.1.1 Annual Environmental Operating Report.
- 3.1.2.3 The temperature measurements shall be visually displayed for monitoring purposes, recorded and reported in accordance with Section 5.6.1.1, Annual Environmental Operating Report.
- 3.1.2.4 When the above monitoring system is not operative an alternative backup system as presented in Section 3.1.1.5 shall be used.
- Deviations from the monitoring program shall be promptly reported in accordance with Section 5.6.2.1.a.

Bases

The placement of the temperature monitoring instrument in the discharge canal will give the temperature of the discharge water immediately before mixing with the receiving

2.0 LIMITING CONDITIONS FOR OPERATION

Bases (Cont'd)

of less than 1.2F°. An upper limit of 98°F of the discharge water at the discharge port is thereby being set.

The thermal discharges shall also be maintained at all times to adequately protect aquatic biota against exposure to excess temperatures and to comply with the New York State thermal criteria.}}

2.1.3 Maximum Heat Rejection Rate (Btu/hr)

Objective

To limit the maximum heat discharged with the heated coolant water into the Hudson River.

Specification

2.1.3.1 The maximum rate of heat rejected into the river with the discharged heated coolant water, determined on a daily average basis, shall not exceed the sum of 16.3×10^9 Btu/hr.

All thermal discharges shall occur through the subsurface ports of the outfall structure.

Bases

The heat rejected is a function of the reactor core design, the primary

2.1-9

3.0 MONITORING REQUIREMENTS

Bases (Cont'd)

water. The placement of this temperature sensor at a 5.5 foot depth in the discharge canal will provide for temperature measurements representative of the discharge water before mixing with the receiving water.

3.1.3 Maximum Heat Rejection Rate (Btu/hr)

Objective

To calculate the maximum heat rejection rate.

Specification

3.1.3.1 The heat output in Btu/hr for all Units in operation shall be averaged daily and reported in accordance with Section 5.6.1. Annual Environmental Operating Report.

Bases

Calculation of the heat rejection rate to the river will be made for use in determining compliance with the limiting condition of operation contained in Section 2.1.3.

Amendment No. 22, Unit 1
Amendment No. 47, Unit 2
Amendment No. 22, Unit 3

2.0 LIMITING CONDITIONS FOR OPERATION

Specification (Cont'd)

- 2.2.2.2 At or below 50% of the sum of the rated power levels of the three Units, a discharge velocity through the discharge ports shall be maintained such that the thermal discharges shall satisfy the New York State thermal criteria. When the discharge canal head differential is less than 1.5 feet, the temperature in the discharge canal shall not exceed 90°F.
- 2.2.2.3 If the head differential is not maintained at the required level beyond 24 hours, such deviation shall be promptly reported in accordance with Section 5.6.2.1.a.

3.0 MONITORING REQUIREMENTS

Specification (Cont'd)

- 3.2.2.2 The relationship between discharge velocity, open port area, and canal head above river level shall be confirmed by actual measurement and reported in accordance with Section 5.6.1.1.
- 3.2.2.3 Results of all adjustments to the gates of each of the port holes of the discharge structure and optimum mode of operation of the CWS through the intake-discharge structure, including the above mentioned relationship shall be recorded and reported in accordance with Section 5.6.1.1. Results of the discharge velocity measurements shall also be recorded and reported in accordance with Section 5.6.1.1, Annual Environmental Operating Report.
- 3.2.2.4 Deviations from these specifications beyond 24 hours shall be promptly reported in accordance with Section 5.6.2.1.a.

4.1.1.a Thermal Plume Mapping

The requirements of this thermal plume mapping program are contained under Conditions III.C.3 and III.C.4 of the New York State Department of Environmental Conservation ("DEC") 401 Certification issued May 2, 1975, and as may be amended by the DEC. Actions required based on the progress of the program are those contained in the 401 Certification. The objectives of the program, types of surveys, schedule for surveys and report requirements are based on those conditions. Those conditions are subject to interpretation and amendment by the DEC.

4.1.1.a.1 Specification

The licensees shall submit to the NRC, concurrently with submittal to the DEC, all reports required under conditions III.C.3 and III.C.4 of the 401 Certification. These submittals will satisfy the reporting requirements of Section 5.6.1.2 (Indian Point 1 and 2) and 5.6.1b. (Indian Point 3).

5.0 ADMINISTRATIVE CONTROLS

5.6

Specifications (Continued)

for the prior interval. Information to be presented will include the following:

- a. Effects of chlorine and other chemical discharges on the ecosystem of the Hudson River in accordance with Sections 2.3 and 3.3 and 4.1.2a(2).
- b. Reduction in frequency of chlorination and reduction in concentration of free and combined residual chlorine in the discharge canal.
- c. Thermal plume model verification and mapping (near and far field) in accordance with Section 4.1.1.a.1.
- d. Ecological effects of thermal discharges in accordance with Section 4.1.2.a(2).
- e. Potential reduction in dissolved oxygen in the cooling water through the plant.
- f. An assessment of performance of fish pumps as installed.
- g. Results of the general ecological survey in accordance with Section 4.1.2a(1).
- h. Ecological effects of entrainment of organisms in accordance with Section 4.1.2a(2).
- i. Evaluation of head loss across the fixed intake screens as a function of velocity through the screens and fish collected.
- j. Ecological effects of fish impingement in accordance with Section 4.1.2a(3)v.i.
- k. Operational experience of air bubblers at Units Nos. 1 and 2 to prevent fish impingement.

Results of all radiological environmental samples taken shall be summarized and tabulated on an annual basis. In the event that some results are not available within the 120 day period, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.6.1
b. Semiannual, and/or Special Environmental Operating Reports

(1) Non-Radiological

A Progress report and/or Annual Report shall be submitted by the licensee to the Director of Office of Nuclear Reactor Regulation by the end of July and the end of January, or as otherwise specified below, describing activities of the Thermal Plume Mapping and Ecological Survey Program, Entrainment Studies, Impingement Studies, and Special studies for the prior six-month interval. Information to be presented will include the following:

NOTE: These programs and studies will be performed in conjunction with Consolidated Edison, operators of Indian Point Units No. 1 and 2, and a joint report issued.

- (a) Effects of chlorine and other chemical discharges on the ecosystem of the Hudson River in accordance with Sections 2.3 and 3.3 and 4.1.2a(2).
- (b) Reduction in frequency of chlorination and reduction in concentration of free and combined residual chlorine in the discharge canal.
- (c) Thermal plume model verification and mapping (near and far field) in accordance with Section 4.1.1.a.1.
- (d) Ecological effects of thermal discharges in accordance with Section 4.1.2a(2).
- (e) Potential reduction in dissolved oxygen in the cooling water through the plant.
- (f) An assessment of performance of fish pumps as installed.
- (g) Results of the general ecological survey in accordance with Section 4.1.2a(1).

ATTACHMENT C

ENVIRONMENTAL IMPACT EVALUATION

The license amendment requested by this Application involves no changes in plant operations or in the limiting conditions of operations at the Indian Point site and therefore has no environmental impact. In addition, no physical monitoring requirement of the ETSR is affected. Protection of the biological community and the environmental compatibility of the plants' thermal effluents and circulating water systems is assured by continued adherence to the limits of the ETSR.

A review of the cost and benefits of the amendment requested shows some benefits and no costs. There would be no environmental impact associated with the proposed action and therefore no cost. There would be administrative and regulatory benefits as a result of the clarification and simplification of ETSR requirements. Therefore, on the basis of a cost-benefit balance, without incurring any environmental impacts, the best course of action involves approval of the request by the licensees.


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NUCLEAR REGULATORY COMMISSION

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POWER AUTHORITY OF THE STATE) Docket No. 50-286
OF NEW YORK)
(Indian Point 3 Nuclear Power Plant))

CERTIFICATE OF SERVICE

I certify that I have, this 12 day of April 1979, served the foregoing document entitled "Application for Amendment to Operating Licenses" fully executed on April 12, 1979, by mailing copies thereof, first class postage prepaid and properly addressed to the following person:

Honorable George V. Begany
Mayor, Village of Buchanan
188 Westchester Avenue
Buchanan, New York 10511


Edward J. Sack