

ERIC T. SCHNEIDERMAN ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE Environmental Protection Bureau

December 17, 2011

Lawrence G. McDade, Chair Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Mail Stop - T-3 F23 Two White Flint North 11545 Rockville Pike Rockville, MD 20852-2738

Richard E. Wardwell Administrative Judge Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission 190 Cedar Lane E. Mail Stop - T-3 F23 Two White Flint North 11545 Rockville Pike Rockville, MD 20852-2738

Dr. Kaye D. Lathrop Administrative Judge Atomic Safety and Licensing Board Ridgway, CO 81432

Re:

Indian Point Nuclear Generating Station, Unit 2 and Unit 3

Docket Nos. 50-247-LR/50-286-LR; ASLBP No. 07-858-03-LR-BD01

Dear Administrative Judges:

The State of New York submits its Statement of Position, Pre-filed Testimony, and Exhibits (NYSR60001 and NYS000223 to NYS000239) in support of consolidated contention NYS-17B. Also enclosed is a certificate of service.

As noted, the State filing its submissions in advance of the deadline for logistical reasons given the number of admitted contentions and to minimize the load on the EIE server and system. The State intends to make additional submissions in support of its other admitted contentions in the coming days.

Respectfully submitted,

Signed (electronically) by

John J. Sipos Assistant Attorney General

cc: All individuals, parties, or NRC offices on EIE Service List