

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CONSOLIDATED EDISON COMPANY OF NEW)	Docket Nos. 50-247 SP
YORK INC. (Indian Point, Unit No. 2))	50-286 SP
)	
POWER AUTHORITY OF THE STATE OF NEW)	May 3, 1982
YORK (Indian Point, Unit No. 3))	

NRC STAFF INTERROGATORIES TO, AND
REQUEST FOR DOCUMENTS FROM PARENTS

INTRODUCTION

The NRC Staff hereby request that Parents pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying all documentary material identified in responses to the interrogatories below.

INSTRUCTIONS AND DEFINITIONS

1. Information sought in these Interrogatories shall include information within the knowledge, possession, control or access of any agents, employees and independent contractors of Parents.
2. Answer each Interrogatory separately in writing under oath or affirmation of the individuals who contributed thereto. Documents produced shall indicate in response to which specific request the documents are being produced. For all references requested in these

DS07
S
11

interrogatories, identify them by author, title, date of publication and publisher if the reference is published; and if it is not published, identify the document by the author, title, the date it was written, the qualification of the author relevant to this proceeding, and where a copy of the document may be obtained.

3. In your answer, repeat each Interrogatory set forth herein and then set forth an answer thereto separately and fully. As to any Interrogatory, section or subsection of said Interrogatory that you refuse to answer for any reason, separately state the grounds for any such refusal. Where a complete answer to a particular Interrogatory, section or sub-section of said Interrogatory is not possible, such Interrogatory, section or sub-section of said Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

4. Identify any documents used as the basis for the answer to the Interrogatory.

5. If any Interrogatory or part thereof is objected to, state separately the objection and basis therefor.

6. If privilege is claimed as to any document, identify what is being withheld, the date of the document, the sender(s), the recipient(s) of all copies, the privilege claimed, the basis for the assertion of privilege, and the present location of the document.

7. If any document requested is unavailable, explain the circumstances of such unavailability.

8. In accordance with 10 C.F.R. § 2.740(e) these Interrogatories and requests for documents require prompt supplemental answers should

Parents obtain or identify supplemental information or documents which call into question the correctness of earlier answers.

9. In the event any word, term, or phrase is unclear to Parents it is requested that oral clarification be requested of the undersigned Staff counsel. Any word, term, or phrase is to have its generally accepted meaning.

10. "Documents" means all writings and records of every type in the possession, control or custody of Parents, its directors, officers, attorneys, employees or agents, including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, logs, transcripts, microfilm, accounting statements, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of the Parents.

INTERROGATORIES

Interrogatory 1

Identify all documentary or other material that you intend to use during this proceeding to support Contentions 3.2, 3.7, 4.1, 4.4, 4.6 and 4.7 and that you may offer as exhibits on these contentions or refer to during your cross-examination of witnesses presented by Consolidated Edison Company of New York, Inc., Power Authority of The State of New York, or the NRC Staff.

Interrogatory 2

a) Upon what person or persons do you rely to substantiate in whole or in part your case on Contentions 3.2, 3.7, 4.1, 4.4, 4.6, and 4.7?

b) Provide the address and education and professional qualifications of any persons named in your response to 2a above.

c) Identify which of the above persons or any other persons you may call as witnesses on these contentions referenced in 2a. above.

Interrogatory 3 (Refer to Contention 4.1)

In your "basis(7)" to your contention II you state that, "[S]pecial institutions outside the 10 mile EPZ will have special problems in dealing with a nuclear emergency." Identify by name and address all the "special institutions" that you are referring to in this statement, and their location. Describe the "special problems" they will encounter in dealing with a nuclear emergency.

Interrogatory 4 (Refer to Contention 4.4)

a) Indicate the specific provisions that should be added to the emergency plan to protect children within and without the EPZ.

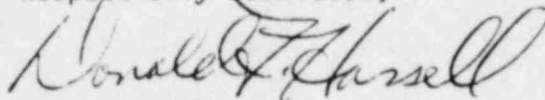
b) In your contention I, basis#(22) you state that "[m]any special institutions within the 10 mile EPZ will have extraordinary problems." Identify the name and location of these "special institutions" and identify the "extraordinary problems" that each of these institutions will have with regard to evacuation.

DOCUMENT REQUESTS

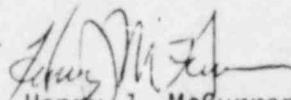
1. Provide for inspection and copying by the NRC Staff all documents identified in Parents' answers to interrogatories 1 through 4 above.

2. Provide for inspection and copying by the NRC Staff all documents within the possession or control of Parents which relate to emergency planning (State, local, or on-site plans) for Indian Point Units 2 and 3.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Donald F. Hassell". The signature is fluid and cursive, with the first name "Donald" being more prominent.

Donald F. Hassell
Counsel for NRC Staff

A handwritten signature in dark ink, appearing to read "Henry J. McGurren". The signature is cursive and somewhat stylized, with the first name "Henry" being the most legible part.

Henry J. McGurren
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 3rd day of May, 1982.