

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 UCS/NYPIRG

INTRODUCTION

The NRC Staff hereby request that UCS/NYPIRG 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 UCS/NYPIRG.
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

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

NCS/NYPIRG 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 UCS/NYPIRG 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 UCS/NYPIRG 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 UCS/NYPRIG.

### INTERROGATORIES

#### Interrogatory 1

Identify all documentary or other material that you intend to use during this proceeding to support Contentions 3.1, 3.2, 3.3, 3.6, 4.1, 4.2 and 4.4, 4.5 and 4.6 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 3.1, 3.2, 3.3, 3.6, 4.1, 4.2 and 4.4, 4.5 and 4.6?

b) Provide the addresses 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 the contentions referenced in 2a. above.

Interrogatory 3 (Refer to Contention 4.1)

Identify the extent to which the EPZ should be expanded giving your reasons for such an expansion.

Interrogatory 4 (Refer to Contention 4.2)

a) Identify what you mean by "adequate sheltering" in your Contention III(A)b. In your response to this Interrogatory give examples of "adequate sheltering".

b) Define what you mean by the term "degraded" with regard to the roadway network in your Contention III(A)c.

c) Define what is meant by the term "upgraded" and the words "made capable of being used" as these words are used in Contention 4.2 and your Contention III(A)e with regard to the roadway network.

Interrogatory 5 (Refer to Contention 4.5)

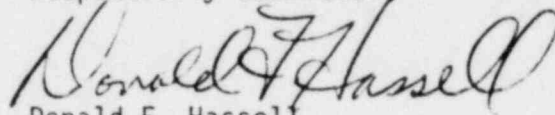
Identify the "specific steps" (with reasons given for each "step") that you believe must be taken by NRC, State, and local officials to promote "public awareness" as referenced in Contention 4.5.

DOCUMENT REQUESTS

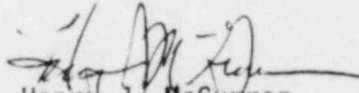
1. Provide for inspection and copying by the NRC Staff all documents identified in UCS/NYPIRG's answers to interrogatories 1 through 5.

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

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Donald F. Hassell".

Donald F. Hassell  
Counsel for NRC Staff

A handwritten signature in cursive script, appearing to read "Henry J. McGurran".

Henry J. McGurran  
Counsel for NRC Staff

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