*82 MAY -4 AM :35

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
Louis J. Carter, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

In the Matter of) Docket Nos.

CONSOLIDATED EDISON COMPANY OF NEW YORK,) 50-247 SP 1NC. (Indian Point, Unit No. 2) 50-286 SP

POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3) May 3, 1982

LICENSEES' DOCUMENT REQUEST UNDER COMMISSION QUESTIONS 3 AND 4 AND THE APRIL 8 ORDER



ATTORNEYS FILING THIS DOCUMENT:

Charles Morgan, Jr.
MORGAN ASSOCIATES, CHARTERED
1899 L Street, N.W.
Washington, D.C. 20036
(202) 466-7000

Brent L. Brandenburg CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. 4 Irving Place New York, New York 10003 (212) 460-4600

D503

LICENSEES' DOCUMENT REQUEST

Licensees request that the intervenors produce and permit the licensees to inspect and copy, pursuant to 10 CFR \$2.741, each and every document identified in the list described in paragraph 2 of the Board's Order dated April 8, 1982 (Amending Memorandum and Order Dated March 10, 1982) (which describe or analyze the emergency planning exercise or the plans that were made to conduct or to observe the exercise carried out on March 3, 1982).

It is requested that the aforesaid production be made on May 14, 1982, at 10:00 a.m., at the offices of Shea & Gould, attorneys for licensee Power Authority, 330 Madison Avenue, New York, New York.

Respectfully submitted,

Brent L. Brandenburg

CONSCLIDATED EDISON COMPANY
OF NEW YORK, INC.
Licensee of Indian Point
Unit 2
4 Irving Place
New York, New York 10003
(212) 460-4600

Charles Morgan,
Paul F. Colarulli
Joseph J. Levin, Jr.

MORGAN ASSOCIATES, CHARTERED 1899 L Street, N.W. Washington, D.C. 20036 (202) 466-7000

Thomas R. Frey
General Counsel
Charles M. Pratt
Assistant General Counsel

POWER AUTHORITY OF THE STATE
OF NEW YORK
Licensee of Indian Point Unit 3
10 Columbus Circle
New York, New York 10019
(212) 397-6200

Bernard D. Fischman Michael Curley Richard F. Czaja David H. Pikus

SHEA & GOULD 330 Madison Avenue New York, New York 10017 (212) 370-8000

Dated: May 3, 1982

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges: Louis J. Carter, Chairman Frederick J. Shon Dr. Oscar H. Paris

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

CERTIFICATE OF SERVICE

I hereby certify that copies of LICENSEES' DOCUMENT REQUEST UNDER COMMISSION QUESTION 3 AND 4 AND THE APRIL 8 ORDER in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 3rd day of May, 1982.

Docketing and Service Branch * Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Louis J. Carter, Esq., Chairman Administrative Judge Atomic Safety and Licensing Board 7300 City Line Avenue Philadelphia, Pennsylvania 19151 New York, N.Y. 10038

Ellyn R. Weiss, Esq. William S. Jordan, III, Esq. Harmon & Weiss 1725 I Street, N.W., Suite 506 Washington, D.C. 20006

Joan Holt, Project Director Indian Point Project New York Public Interest Research Group 5 Beekman Street

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Marc L. Parris, Esq. Eric Thorson, Esq. County Attorney County of Rockland 11 New Hemstead Road New City, N.Y. 10956

Geoffrey Cobb Ryan
Conservation Committee
Chairman, Director
New York City Audubon Society
71 West 23rd Street, Suite 1828
New York, N.Y. 10010

Greater New York Council on Energy c/o Dean R. Corren, Director New York University 26 Stuyvesant Street New York, N.Y. 10003

Jeffrey M. Blum, Esq. *
New York University Law
School
423 Vanderbilt Hall
40 Washington Square South
New York, N.Y. 10012

John Gilroy, Westchester
Coordinator
Indian Point Project
New York Public Interest
Research Group
240 Central Avenue
White Plains, New York 10606

Janice Moore, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Charles J. Maikish, Esq. Litigation Division The Port Authority of New York and New Jersey One World Trade Center New York, N.Y. 10048

Ezra I. Bialik, Esq.
Steve Leipsiz, Esq.
Enviromental Protection Bureau
New York State Attorney
General's Office
Two World Trade Center
New York, N.Y. 10047

Alfred B. Del Bello Westchester County Executive Westchester County 148 Martine Avenue White Plains, N.Y. 10601 Atomic Safety and Licensing Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Andrew S. Roffe, Esq. New York State Assembly Albany, N.Y. 12248

Renee Schwartz, Esq. Paul Chessin, Esq. Laurens R. Schwartz, Esq. Margaret Oppel, Esq. P.O. Box 125 Botein, Hays, Sklar & Herzberg Croton-on-Hudson, N.Y. 10520 200 Park Avenue New York, N.Y. 10166

Stanley B. Klimberg General Counsel New York State Energy Office 2 Rockefeller State Plaza Albany, New York 12223

Honorable Ruth Messinger Member of the Council of the City of New York District No. 4 City Hall New York, New York 10007

Lorna Salzman * Mid-Atlantic Representative Friends of the Earth, Inc. 208 West 13th Street New York, N.Y. 10011

Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Honorable Richard L. Brodsky Member of the County Legislature Westchester County County Office Building White Plains, N.Y. 10601

Pat Posner, Spokesperson * Parents Concerned About Indian Point

Charles A. Scheiner, Co- * Chairperson Westchester People's Action Coalition, Inc. P.O. Box 488 White Plains, N.Y. 10602

Alan Latman, Esq. 44 Sunset Drive Croton-on-Hudson, N.Y. 10520

Zipporah S. Fleisher * West Branch Conservation Association 443 Buena Vista Road New City, N.Y. 10956

Mayor George V. Begany Village of Buchanan 236 Tate Avenue Buchanan, N.Y. 10511 Judith Kessler, Coordinator *
Rockland Citizens for Safe
Energy
300 New Hempstead Road
New City, N.Y. 10956

Ms. Amanda Potterfield, Esq. *
P.O. Box 384
Village Station
New York, New York 10014

Said H. Pikus

^{*} Service effected by Express Mail.