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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

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

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LICENSEES' INTERROGATORIES
AND DOCUMENT REQUEST
UNDER COMMISSION QUESTIONS
3 AND 4



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

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PRELIMINARY STATEMENT

Pursuant to 10 CFR Part 2 and the Memorandum and Order (Formulating Contentions, Assigning Intervenors, and Setting Schedule) herein, dated April 23, 1982 (the "April 23, 1982 Order"), Consolidated Edison Company of New York, Inc. ("Con Edison"), licensee of Indian Point Station, Unit No. 2, and Power Authority of the State of New York ("Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), request that each of the intervenors specified below answer separately, fully, seriatim and on or before May 17, 1982, or, if this document has not been served upon you by personal delivery, on or before May 24, 1982,* under oath and otherwise in accordance with 10 CFR Part 2 and the April 23, 1982 Order, each of the following interrogatories.**

These interrogatories are directed to each of the

* Pursuant to 10 CFR § 2.710 (as amended, 46 Fed. Reg. 58279 (Dec. 1, 1981)), parties served by Express Mail must answer interrogatories on or before May 19, 1982.

** Pursuant to footnote 3 to the April 23, 1982 Order, the Board has held the litigation of certain psychological fear and stress issues in abeyance pending the issuance of an opinion by the Court of Appeals for the District of Columbia in PANE v. NRC and further administrative guidance. Accordingly, the licensees reserve the right to serve further interrogatories on that subject upon such resolution.

following intervenors: Union of Concerned Scientists-New York Public Interest Research Group, Inc. ("UCS/NYPIRG"), Westchester People's Action Coalition, Inc. ("WESPAC"), West Branch Conservation Association ("WBCA"), Friends of the Earth, Inc. ("FOE"), New York City Audubon Society ("Audubon"), Parents Concerned About Indian Point ("Parents"), and Rockland Citizens for Safe Energy ("RCSE").

Note that intervenors are required to comply with definition H below, when identifying any claimed defect or inadequacy in emergency planning for Indian Point, the Indian Point emergency plan or the evacuation time estimates. Pursuant to such instruction, such identification should include a citation to any Nuclear Regulatory Commission or Federal Emergency Management Agency guidelines which intervenors claim the licensees have not complied with and the steps intervenors claim should be taken to remedy the claimed defect.

With respect to each interrogatory, if a particular intervenor does not make a particular allegation, claim, or contention, and has not been assigned lead or contributing intervenor status with respect to such allegation, claim or contention by the orders of the Board herein, said intervenor should so state.

TIME PERIOD

Unless otherwise specified, each interrogatory calls

for information for the entire period from January 1, 1971 through the date on which the answer or response to that interrogatory is served upon the licensees (sometimes referred to hereinafter as the "relevant period"). If any change occurred or occurs during the relevant period which affects the correctness, accuracy or intelligibility of any answer to any of these interrogatories, the exact nature of each change and the date thereof should be set forth in each such answer to each such interrogatory.

Intervenors shall supplement their responses to these interrogatories as required by 10 C.F.R. § 2.740(e).

DEFINITIONS

A. "or" shall mean and/or.

B. "Document" shall mean any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts and both sides thereof, and including, but not limited to: papers, books, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings (including, but not limited

to, meetings of boards of directors or committees thereof), affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, financial statements, computer printouts, data processing input and output, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing however denominated by intervenors.

C. "Identify" or "state the identity," when referring to a document shall mean to state:

1. The generic nature of the document (e.g., letter, memorandum, telegram, etc.);
2. The date on which the document and each copy thereof was prepared;
3. The name of each author, addressor and addressee of the document;
4. The name of each past or present custodian of each copy of the document; and
5. A brief description of the contents of the document. (In lieu of such a description, you may append to your answer a true and complete copy of the document.)

D. "Identify," when referring to an oral communication, shall mean:

1. To state the date of such communications;

2. To identify each person participating therein and each person who was present;

3. To state what was said by each participant in the course of such communication, or, if not known as recalled, the substance;

4. To state whether there are any documents which set forth, summarize or refer to any portion of such oral communication; and

5. If such documents exist, to identify each such document and each person having custody of the document.

E. "Identify" or "state the identity", when referring to a person, shall mean to state:

1. The person's full name;

2. The name of his employer;

3. His position with such employer;

4. His business address and telephone number;
and

5. His present or last known home address and telephone number.

Once a person has been identified in response to any interrogatory and provided no requested information concerning such person is different from that provided for in the earlier identification it shall be sufficient thereafter to identify such person by name only.

F. "Guidelines of the Nuclear Regulatory Commission" shall mean all rules and regulations codified in the Code of Federal Regulations, all NUREG's and regulatory guides issued

by the Commission, and all conditions or provisions of both licensees' operating licenses.

G. "Evacuation time estimates" shall mean the evacuation time estimates for the Indian Point emergency planning zone ("EPZ") prepared by CONSAD Research Corporation ("CONSAD") and those prepared by Parsons Brinckerhoff Quade & Douglas, Inc. ("Parsons"). Any response dealing with evacuation time estimates should state specifically which portion of the response pertains to CONSAD's estimates and which portion refers to Parsons' estimates.

H. "Identify," when referring to a claimed defect or inadequacy in emergency planning for Indian Point, the Indian Point emergency plan or in the evacuation time estimates, shall mean to state specifically the nature of the claimed defect or inadequacy, including:

1. the aspect of planning, provision of the plan or the evacuation time estimate alleged to be defective or inadequate;

2. the volume(s) and page number(s) of the emergency plan at which a defective or inadequate provision or evacuation time estimate appears;

3. whether the aspect of planning, plan provision or evacuation time estimate is alleged not to comply with any provision of the guidelines of the Nuclear Regulatory Commission ("NRC") or Federal Emergency Management Agency ("FEMA"), and if so, a specific citation to the applicable regulation;

4. the grounds for your claim that the aspect of planning, plan, provision or evacuation time estimate is defective or inadequate;

5. what steps you claim should be taken to remedy the claimed defect or inadequacy;

6. the grounds for your claim that the steps identified in response to (5) would remedy the claimed defect or inadequacy;

7. whether the steps identified in response to (5) have been taken at any nuclear plant or in any emergency plan other than Indian Point, and if so, the identity of the nuclear plant or emergency plan;

8. the specific relation between the claimed defect or inadequacy and the fact that the Indian Point vicinity is alleged to be an area of high population density;
and

9. in the case of a claimed defect in an evacuation time estimate, what you claim would be a correct estimate, and the method of calculation of such estimate.

I. The word "person" as used herein, shall refer both to individuals and to any other legal entity.

J. "You" or "your" means the intervenors to whom these interrogatories are directed and agents, servants, employees, officers, directors and attorneys of any of them and all other persons acting or purporting to act on behalf of any of them.

K. To "state the grounds" or to "identify the grounds" for an allegation, claim, or contention means to

describe in detail the reasoning and facts and to provide all data and calculations, which you claim support the allegation, claim, or contention, and to identify all relevant documents, and communications, and individual informants and to state the precise nature and source of your knowledge, information and belief that there is good ground to support such allegation, claim, or contention, and to specify any assumption on which the allegation, claim or contention is based. In the case of any assumption on which an allegation, claim, or contention is based, state the probability that such assumption will in fact occur, and the method of calculation of such probability. If any part of the grounds for an allegation, claim, or contention is a guideline of the NRC, cite said guideline with specificity. If a particular intervenor does not make a particular allegation, claim, or contention, said intervenor should so state.

L. To "state the probability" of an event means to state the probability that the event will occur, to set forth the method by which the probability was calculated, and to set forth the data used in the calculation.

INSTRUCTIONS

References to the singular shall be deemed to include the plural, and references to the plural shall be deemed to include the singular. The use of the past tense in a verb

shall be deemed to include the present, and the use of the present tense shall be deemed to include the past. The use of any word in the masculine or feminine gender shall be deemed to include the other gender and the neuter, and when the sense so indicates, words of neuter gender shall be deemed to refer to any gender.

All interrogatories requesting identification of documents shall be deemed to refer to documents in the possession of any intervenor that were sent, received, written or otherwise generated during the relevant period (unless otherwise specified), and any other documents referred to or relied upon in connection with the preparation of the contentions or your answers to these interrogatories, regardless of whether they are in your possession or control.

Should you claim a privilege (including, without limitation, the attorney-client or work product privilege) with respect to any part of any discussion, document or other communication concerning which information is requested by any of the following interrogatories, you should answer the interrogatories in the manner above indicated, except that you need not set forth a summary of the contents of the part deemed privileged, i.e., in the case of a document, you should supply items C(1)-C(4), above, and in the case of an oral communication, you should supply items D(1), D(2), D(4), and D(5). In addition

to setting forth the above noted information concerning each such discussion, document or communication, you shall indicate that you claim privilege for such part and shall state the nature of the privilege claimed and the facts upon which such claim is based.

INTERROGATORIES

1. Identify* and state the grounds for each defect or inadequacy in the Indian Point emergency plans which you claim does not meet those standards set forth in 10 CFR § 50.47(b) or appendix E to 10 CFR Part 50.

2. For each instance in which you claim that an emergency response organization has failed to fully document the existence of appropriate letters of agreement with support organizations and agencies, identify:

- (a) the emergency response organizations;
- (b) the support organizations;
- (c) the relationship of each emergency response organization to the support organization;
- (d) the nature of the agreement which you claim has not been documented; and
- (e) the grounds for your claim that documentation of the agreement is required.

* Note that in the case of this interrogatory and all succeeding interrogatories described in Instructions H and K above, you are required to comply with said Instructions in answering the interrogatory.

3. For each relationship of the licensees, the state and local governments, and support organizations which you claim is not delineated in the emergency plans, identify:

(a) the state, local government, or support organization involved;

(b) the relationship you claim is not delineated; and

(c) the grounds for your claim that the emergency plan should delineate the relationship.

4. For each letter of agreement that you claim is outdated, identify:

(a) the letter of agreement;

(b) the grounds for your claim that a letter of agreement more than one year old is outdated; and

(c) any events occurring since the date of the letter of agreement that you claim renders the agreement outdated.

5. For each letter of agreement that you claim fails to describe mutually agreed upon provisions for the exchange of information relevant to the provision of emergency measures or services, identify:

(a) the letter of agreement;* and

* Note that in the case of this interrogatory and all succeeding interrogatories requiring identification of documents, you are required to comply with Instruction C, above, in answering the interrogatory.

(b) the grounds* for your claim that the letter of agreement fails to describe mutually agreed upon provisions for the exchange of information relevant to the provision of emergency measures or services.

6. For each individual in the line of succession for the "emergency coordinator" position that you claim is not qualified or not fully trained, identify:

(a) the individual;** and

(b) the grounds for your claim that that individual is not qualified or not fully trained.

7. State whether you claim that the licensees do not meet the "minimum staffing requirements" of Table B-1 of NUREG-0654, and if you do so claim, state the grounds for such claim.

8. For each respect in which you claim that sufficient operational, maintenance, supervisory, technical support,

* Note that in the case of this interrogatory and all succeeding interrogatories described in Instruction K above, you are required to comply with said Instruction in answering the interrogatory.

** Note that in the case of this interrogatory and all succeeding interrogatories requiring identification of persons, you are required to comply with Instruction E in answering the interrogatory.

and administrative personnel to adequately respond to an accident are not promptly available, identify:

(a) the personnel you allege would not be promptly available; and

(b) the grounds for your claim that such personnel are not promptly available.

9. For each respect in which you claim the emergency plans fail to indicate in what time frames the expected emergency response support and resources will be available for implementation, identify:

(a) the expected emergency response support or resource in question;

(b) the grounds for your claim that the plans fail to indicate in what time frame the emergency response support or resource is available for implementation; and

(c) the postulated accident scenarios about which you claim time frames for expected emergency response support are lacking, and the probabilities thereof.

10. State what criteria should be used in the emergency plans in determining the most efficient and most productive use (in terms of protecting the public health and safety) of available services and resources should such services and resources become wholly or partially unavailable or should such services and resources be inadequate to respond to a particular emergency situation.

11. For each criterion identified in response to interrogatory No. 10:

(a) state the source of the criterion; and

(b) identify each emergency plan for a nuclear plant in the United States which incorporates the criterion.

12. For each criterion identified in response to interrogatory No. 10, identify each provision of the current Indian Point emergency plan where more efficient and productive use of available services and resources could be realized by use of the criterion.

13. Identify each respect in which you claim that adequate communications capabilities including, without limitation, communications equipment, have not been provided to assure the availability of communications under such circumstances as loss of normal power, technical problems with commercial telephone service, and adverse weather affecting normal communication systems; the probability of each such occurrence; and the method of calculation used to arrive at each such probability.

14. For each alleged inadequacy in communications capabilities identified in response to interrogatory no. 13, identify each nuclear plant emergency plan in the United States which currently has such communication capability.

15. State whether any licensee of a nuclear plant in the United States has established adequate "emergency action level" ("EAL") criteria, and without limitation, define "adequate" EAL criteria.

16. If your answer to interrogatory No. 15, is in the affirmative, identify each such licensee.

17. Identify each analysis in your custody or control dealing with or relating to the probability of loss of normal power, technical problems with commercial telephone service, or adverse weather conditions at Indian Point.

18. Identify what constitutes timely recognition of accident sequences with offsite consequences, sufficient to allow implementation of emergency response plans.

19. Identify each respect in which you claim the licensees have failed to establish adequate EAL criteria as provided for in Appendix 1 to NUREG-0654, and for each such respect, state the grounds for your claim that the licensees have failed to establish adequate criteria.

20. Identify those accidents for which parameters are not specified in the EAL's.

21. For each accident identified in response to interrogatory No. 20, identify:

(a) the probability of such accident, and the method of calculation of such probability;

(b) the parameters that should be specified for such accident;

(c) the grounds for your claim that such parameters should be specified for the accident; and

(d) each nuclear plant in the United States which has specified such parameters in an EAL.

22. Identify each EAL that does not adequately account for lead times necessary to implement protective action.

23. For each EAL identified in response to interrogatory No. 22:

(a) state the lead time necessary to implement protective actions; and

(b) state the grounds for your claim that such lead time is necessary to implement protective action.

24. Identify each respect in which you claim that the prompt notification capability has not been fully implemented.

25. Identify each respect in which you claim the content of Emergency Broadcast System ("EBS") messages is insufficient to adequately assure proper response.

26. Identify each respect in which you claim that the proposed prompt notification system fails to provide adequate notice to non-English-speaking residents.

27. For each of the following groups: (1) families with no English-speaking member; (2) the deaf and hearing impaired; (3) members of the population with learning disabilities; (4) "latch-key" children; (5) handicapped persons; (6) invalids; and (7) other special populations:

(a) define the group;

(b) state the number of group members who reside in the EPZ;

(c) state the grounds for your calculation as to the number of individuals in the group in the EPZ;

(d) state whether any of the groups overlap, and if so, the extent of the overlap, and the grounds for your statement as to the extent of the overlap;

(e) identify the respects in which the current emergency plans are deficient with respect to the group;

(f) identify the percentage, and geographical concentration of such persons within the plume EPZ;

(g) state how said percentage compares numerically with all other nuclear power plant sites in the United States;

(h) state the manner in which said persons could be adequately alerted and informed of a radiological emergency; and

(i) state the manner in which said persons would be alerted and informed of non-radiological emergencies and if different from your answer to (h), above, identify and state the grounds for such differences.

28. Identify each respect in which you claim that the current emergency planning pamphlets are inadequate.

29. State the grounds for your allegation that the present emergency planning pamphlets and present means of alerting and informing the population of an emergency do not give adequate attention to problems associated with persons who are deaf, blind, too young to understand the instructions, or who do not speak English, and without limitation:

(a) identify all "problems associated" with such persons;

(b) state the age at which children are too young to understand the instructions; and

(c) identify specific portions of the pamphlets which contain the purported deficiencies.

30. If you claim that the emergency planning pamphlets should be published in languages other than English:

(a) identify each such other language;

(b) for each language identified in response to (a), state the number of households in the EPZ which speak such language and contain no English-speaking member; and

(c) for each statement in response to (b), state the grounds for such statement.

31. State the grounds for your claim that transients who may be in the EPZ during an accident would not be adequately notified.

32. With respect to all transients alleged to be present within the plume exposure pathway EPZ ("plume EPZ"):

(a) for each of the four seasons, identify the estimated average number of persons present on weekdays;

(b) for each of the four seasons, identify the estimated average number of persons present on weekend days;

(c) identify the means of transportation used to arrive there;

(d) state the grounds for your allegations in (a) - (c) above; and

(e) state the grounds for your allegation that radiological emergency planning for such persons would be impossible.

33. Identify each respect in which you claim that the licensees' emergency response facilities do not comply with 10 CFR 50.47(b).

34. Identify each instance in which you claim that an emergency response facility is not sufficiently equipped and staffed.

35. Identify each instance in which you claim that emergency radiation monitoring capabilities of an emergency response organization are insufficient.

36. Identify each respect in which you claim that the ARAC and MIDAS assessment systems are insufficient for a range of accident conditions, including, without limitation, specification of the relevant range of accident conditions.

37. State in detail the influences of the "bowl" on local meteorology, and for each respect for which you claim the bowl influences local meteorology, state the grounds for your claim.

38. Identify each accident assessment capability lacking in an emergency response organization that would preclude it from making rapid assessments of the potential magnitude and locations of radiological hazards caused by liquid or gaseous release and, without limitation, define "rapid assessments".

39. Identify each respect in which you claim that the bases or criteria contained in the emergency plans are insufficient to make choices of protective actions in the event of a radiological emergency.

40. Identify each respect in which you claim that the evacuation time estimates prepared by (a) CONSAD; and (b) Parsons are inadequate for use in making protective action decisions.

41. Identify each protective action that you claim should have been developed in the plans.

42. For each protective action identified in response to interrogatory no. 41, identify:

(a) the accident scenario in which such protective action would be appropriate;

(b) the probability of the scenario; and

(c) the grounds for your claim that such protective action would be appropriate for the scenario.

43. Identify each respect in which you claim there are insufficient adequate sheltering capabilities within the EPZ.

44. Identify each respect in which you claim that sheltering afforded by structures within the EPZ varies considerably in effectiveness, and state the grounds for each such claim.

45. Identify each respect in which the emergency plans are deficient with regard to methods for permanent record keeping of emergency response personnel radiation exposure.

46. Identify each respect in which you claim that decontamination facilities, equipment, supplies, and trained personnel to conduct decontamination are not available in sufficient quantity to adequately respond to an accident.

47. Identify (a) each emergency response organization which does not have adequate capabilities to assess doses to emergency workers; and (b) the respects in which such emergency response organization lacks adequate capabilities.

48. Identify (a) each emergency response organization which lacks a sufficient supply of promptly available personnel

dosimetry; (b) the respects in which each such organization lacks such equipment; and (c) state whether you contend that such equipment would or would not be available to each such emergency response organization on short notice from other private or public sources, in the event of a radiological emergency, and state the grounds therefor.

49. Identify each respect in which you claim that relocation centers lack sufficient equipment for radiological monitoring of evacuees in a timely and adequate manner.

50. State the grounds for your allegation that medical and hospital facilities are inadequate to respond to a radiological emergency and, without limitation, identify the number of irradiated and contaminated persons that you claim will not be able to be cared for in existing hospital and medical facilities and the grounds for such estimate.

51. State the grounds for your claim that there is no method set forth in the plans for periodically estimating the total population exposure.

52. Identify each respect in which you claim that the recovery plans and procedures are not sufficiently detailed as to provide reasonable assurance that the public health and safety would be adequately protected.

53. State the grounds for your claim that there are no action level criteria or other objective criteria upon which to base decisions regarding the return of the general public to areas affected by a nuclear power plant accident at Indian Point.

54. Identify each respect in which you claim that the conduct of and planning for drills and exercises is not sufficiently detailed in the plans.

55. Identify each respect in which you claim that exercises and drills do not provide a sufficiently realistic test of emergency plans and response capabilities.

56. Identify each respect in which training criteria for emergency response personnel are not adequately set forth in the plans.

57. Identify each respect in which accountability programs are not described in the plans.

58. Identify each instance of necessary training which you claim has not yet taken place.

59. Identify each respect in which you claim that there is not sufficient assurance that the public will be adequately informed of revisions to the emergency plans.

60. Identify each respect in which you claim that there are no provisions for updating public information programs.

61. For each emergency response organization which you claim lacks sufficient expertise to properly utilize the evacuation time estimates, identify:

(a) the organization;

(b) the expertise it allegedly lacks; and

(c) the specific respects in which the organization will be required to vary the "idealized conditions assumed for the purposes of the time estimate studies."

62. State the grounds for your claim that there is no assurance that an adequate and appropriate level of preparedness will be maintained for so long as the Indian Point units operate.

63. Identify each public official with key responsibilities whom you claim remains unaware of the details of the emergency plan; and identify the respects in which you claim each such official remains unaware of the details of the emergency plan.

64. Identify each individual who has been blocked from securing a copy of the emergency plan, and the manner in which each such individual has been blocked.

65. State the grounds for your claim that most citizens do not know that a plan exists.

66. Identify each respect in which you claim that the American Red Cross lacks the resources to assume its responsibilities pursuant to the emergency plan.

67. State whether the resources needed by the American Red Cross to assume its responsibilities pursuant to the emergency plan differ from the resources needed by the American Red Cross to respond to other emergencies, and if your answer is in the affirmative, state the grounds for your allegations.

68. Identify each respect in which you claim that bus service is not adequate for handling mass school evacuations as well as carrying all persons without personal automobiles.

69. State:

(a) your estimate of the number of ambulances available in the EPZ;

(b) the grounds for your estimate; and

(c) the grounds for your claim that the number of ambulances in the EPZ is inadequate.

70. State the grounds for your claim that the density of traffic in relevant areas will necessarily result in collisions for which there are insufficient towing and repair services, and without limitation, identify all "relevant areas."

71. Identify each respect in which you claim that:
(a) the emergency plans; and (b) the evacuation time estimates have failed to adequately account for the density of traffic.

72. Identify each policeman, fireman, and teacher, whom you claim cannot be expected to carry out his responsibilities under the emergency plan, and the responsibilities each such individual cannot be expected to carry out and the length of time each such individual would be exposed to radiation, and the dose thereof; and state the grounds for such claim.

73. Identify each instance in which you claim that the licensees have failed to comply with NRC regulations in connection with communicating information about conditions at the Indian Point plants.

74. Identify the respects in which the drain on telephone service will be intolerable.

75. State what you claim would constitute an effective drill, and the grounds for such claim.

76. Identify each type of need, situation, capability, and ability which has not been adequately taken into account in the development of the emergency plans.

77. Identify the correct assumptions that should be made about the response of the public, including utility employees and emergency workers, during a radiological emergency and identify all respects in which you claim that such response to hazards which involve the threat of contamination are qualitatively different from response to hazards in which the extent of the danger is more immediately determined by human senses.

78. Identify all respects in which you claim that people respond to radiological threats in a manner different from the way in which people respond to hazards such as fires and floods.

79. State the grounds for your claim that prohibition of access to limited access roadways outside the EPZ will provoke panic and disorganization.

80. State the grounds for your claim that panic will ensue when parents and children cannot communicate with each other.

81. State the grounds for your claim that individuals waiting in cars in traffic will not behave cooperatively.

82. State the grounds for your claim that TMI-2 accident experience demonstrated that "extra" trips within the affected area will be made.

83. With regard to the discussion of a "PWR atmospheric accident" in the bases of UCS/NYPIRG I(B)(2):

- (a) define "conditional probability;"
- (b) state the probability assumed for the accident scenarios in which the protective action guides ("PAG's") were exceeded;
- (c) state the meteorology assumed;
- (d) state the probability of the various accidents and the various meteorologies occurring at the same time; and
- (e) state the total probability (not conditional probability) of exceeding the PAG guidelines.

84. Identify each respect in which you claim that the time estimates for evacuation assume different procedures for the evacuation of school children than the plans themselves actually call for.

85. State the grounds for your claim that Rockland County cannot be evacuated in any safe time.

86. State the grounds for your claim that operating personnel will abandon the Lovett and Bowline stations.

87. State whether you claim that operating personnel will abandon the Indian Point plants in the event of a radiological emergency, and if you do so claim, state the grounds for such claim.

88. State your estimate of the probability:

- (a) that there would be
 - (i) a failure in transmission lines,
 - (ii) a blown-up transformer, or
 - (iii) faulty circuit breakers; and

(b) that such event would occur simultaneously with an accident at Indian Point that would require evacuation, and the grounds for such estimate.

89. Identify each respect in which the time estimates of: (a) CONSAD, and (b) Parsons are inadequate, and identify all "unproven assumptions" and "unverified methodologies" upon which they allegedly rely, and identify and annex copies of all documents claimed to support your allegations.

90. State what you regard as accurate estimates of the evacuation time for the EPZ and the grounds for your claim that such estimates are accurate, including, but not limited to, the method by which your estimates were calculated.

91. State the grounds for your allegation that the licensees cannot be depended upon to notify the proper authorities promptly and accurately enough to assure effective response, and, without limitation:

(a) identify all licensee employees whom you claim cannot be depended upon;

(b) identify all prior instances in which the licensees did or did not notify the proper authorities promptly and accurately; and

(c) state the manner in which the State's assessment and notification capabilities would not independently assure an effective response.

92. State the grounds for your claim that sheltering has been demonstrated to be useful for no more than a two hour

period in terms of protecting the public from inhalation doses.

93. State the probability of accident scenarios (in combination with meteorological conditions common to the Indian Point area) for which there are no adequate protective actions to protect the public health and safety, and the grounds for your statement regarding such probability.

94. Identify each respect in which you claim the emergency plans and protective actions do not adequately address the special circumstance of precipitation occurring at the time of a release of radioactivity.

95. State the risk to the population (a) in the EPZ; and (b) in any proposed expanded EPZ, of precipitation occurring at the time of a release, and the grounds for your calculation.

96. Identify each respect in which you claim that the emergency plan and the protective action alternatives fail to adequately address the nature of the river valley and mountain system in the Indian Point area.

97. Identify each respect in which you claim the emergency plan and proposed protective action alternatives fail to adequately address conditions which would prevail during inversion or other adverse meteorology.

98. Identify each respect in which (a) the emergency plan and proposed protective action alternatives; and (b) the evacuation time estimates fail to address the impact of snow or icing upon the ability of emergency response organizations and the general public to effectuate evacuation as a protective action.

99. State the grounds for your claim that any pre-school children or home-bound children who are dependent on public transportation could be required to wait several hours.

100. State:

(a) the number of school buses available to evacuate the population in the EPZ;

(b) the number of buses that you claim are necessary to evacuate the population in the EPZ;

(c) the grounds for the numbers stated in response to (a) and (b); and

(d) whether you contend that buses would or would not be available to each appropriate emergency response organization on short notice from other private or public sources, in the event of a radiological emergency, and state the grounds therefor.

101. State the grounds for your claim that tens of thousands of people are expected to evacuate down Route 9A South through Briarcliff.

102. Identify the specific respects in which the evacuation time estimates are inaccurate with respect to evacuation on Route 9A.

103. State the grounds for your contention that perhaps as many as 15,000 people are expected to get on the Taconic Parkway North via Route 202.

104. Identify the specific respects in which the evacuation time estimates are inaccurate with regard to evacuation on the Taconic Parkway North via Route 202.

105. State the grounds for your claim that many thousands of people are expected to take the Taconic Parkway South, with half of them getting on at the same entrance, Baldwin Road in Yorktown.

106. Identify the specific respects in which you claim the evacuation time estimates are inaccurate with respect to evacuation on the Taconic Parkway South.

107. With regard to the serious accident postulated in WBCA Question 1, state (a) the probability of such an accident; (b) the risk posed by such an accident; and (c) the grounds for your response to (a) and (b).

108. Identify all respects in which you claim that the evacuation time estimates are inaccurate with regard to Rockland County.

109. State the population and geographical concentration of transients on summer weekends and during ski weather

in Rockland County and the grounds for your statement of such numbers.

110. State the grounds for your claims that Wayne Avenue is not capable of carrying emergency traffic.

111. Identify each respect in which you claim that the evacuation time estimates are inaccurate for ERPA's 30-33.

112. Identify the boundaries to which you allege that the plume EPZ should be expanded, including, without limitation:

- (a) the geographic territory included (annex map);
- (b) the additional square mileage included;
- (c) the approximate radius;
- (d) the maximum mileage from the plants' site boundary to the outer boundary of the proposed EPZ;
- (e) the additional population included; and
- (f) any additional counties, municipalities, or other political entities included.

113. State the grounds for your allegation that the plume EPZ should be expanded, including, without limitation, reference to each of the factors contained in 10 CFR § 50.47(c)(2) which you claim support the expanded plume EPZ that you propose.

114. Identify the impacts of the expansion of the plume EPZ:

(a) upon evacuation time estimates, including but not limited to evacuation times for children, handicapped, invalids, or mentally retarded persons, and other persons dependent upon others for their mobility; and

(b) upon the number of transients who are located within the plume EPZ.

115. State whether you allege that the present level of emergency planning does not provide an adequate basis upon which adequate further measures can be taken beyond the current plume EPZ at the time of a radiological emergency. If your answer is in the affirmative:

(a) state the grounds for said allegation;

(b) identify further measures which you allege should be taken beyond the current plume EPZ at the time of a radiological emergency; and

(c) identify each of the improvements in emergency planning necessary to achieve the basis for implementing the measures set forth in (b) above.

116. Identify all "special institutions" referred to in Parents' Contention II, Basis (7), and all "special problems" said institutions will have in dealing with a nuclear emergency. For each such "special institution", state:

(a) the number of residents;

(b) the number of staff;

(c) the average number of out-patients;

(d) the nature of the institution; and

(e) the resources which each such institution would strain.

117. State the grounds for your allegation that special institutions will have special problems in dealing with a radiological emergency.

118. State the grounds for your allegation that it would be impossible to implement timely appropriate protective measures in the New York City Metropolitan Area, and, without limitation, identify:

(a) the boundaries of the New York City Metropolitan Area;

(b) the protective measures you allege to be appropriate;

(c) the time period in which such measures should be taken, and the grounds for alleging that such measures could not now be timely implemented;

(d) the grounds for your claim that such measures would be appropriate; and

(e) the grounds for your claim that such measures would be impossible to timely implement.

119. Identify each respect in which you claim that measures for control of agricultural products and drinking water supplies beyond the plume EPZ are inadequate.

120. Identify specifically the "massive damage to the public health and safety beyond the current plume EPZ" which you allege would occur in the event of a "severe radiological accident" and identify each such "severe radiological accident," including, without limitation, the probability of such accident and the grounds for your statement of the probability.

121. State the grounds for your allegation that the direction of evacuation for the majority of potential evacuees would be limited.

122. State the grounds for your allegation that the direction of the roadway network and the direction of increased population density and absolute numbers of population are in the direction toward which winds frequently blow in the Indian Point area.

123. Identify all analyses regarding, referring to, or relating to wind direction in the Indian Point area.

124. Identify changes in wind direction in the Indian Point area which generally occur within a 24-hour period and the time, season, and direction of such changes.

125. State the grounds for your allegation that consequences of accidents would be manifested at distances beyond the current plume EPZ and, without limitation, identify:

(a) the accidents which intervenors allege would produce such consequences;

(b) the probabilities and consequences of such accidents;

(c) the method of calculation of such probabilities and consequences; and

(d) the particular manifestations associated with each such consequence.

126. State the grounds for your allegation that the New York City Metropolitan Area would not accept an influx of large numbers of potentially or actually irradiated and/or contaminated persons evacuating from Indian Point, and, without limitation, identify:

(a) the number of potentially or actually irradiated and/or contaminated persons that intervenors allege would be evacuating;

(b) the boundaries of the New York City Metropolitan Area to which persons would allegedly be evacuating; and

(c) the manner in which the New York City Metropolitan Area "would not accept" such evacuees.

127. Identify each respect in which you claim that the topography of the Indian Point area has not been adequately addressed in emergency planning.

128. State the grounds for your allegations that the present plume EPZ should be extended sufficiently to encompass the entire population which is at risk from all consequences of accidents at Indian Point Units 2 and 3 and, without limitation, identify:

(a) all such consequences and the probabilities thereof and the method of calculation of such probabilities and consequences;

(b) the size and location of the population alleged to be at risk; and

(c) the manner in which current emergency planning fails to account adequately for such risk.

129. With respect to each procedure (a)-(d) contained in Contention 4.2, state the grounds for your allegation that the procedure:

- (a) is feasible; and
- (b) should be taken to protect the public.

130. With respect to each procedure (a)-(d) contained in Contention 4.2, state whether implementation of the procedure can be expected in the near future; if your answer is in the affirmative, state:

- (a) the grounds for such an allegation; and
- (b) the time schedule within which each such procedure is expected to be implemented.

131. State the grounds for your allegation that potassium iodide should be provided in an appropriate form for all residents in the EPZ.

132. Identify the "appropriate form" for provision of potassium iodide.

133. Identify all negative health effects known to or believed by you to be associated with the provision of potassium iodide, and state the grounds for such knowledge or belief.

134. Identify the quantity of potassium iodide which you allege constitutes a sufficient supply, and state the grounds for said allegation.

135. Identify the "distribution system" for potassium iodide for transients within the plume EPZ which intervenors would allege to be adequate, and, without limitation, state whether you contend that such supply would or would not be available to each appropriate emergency response organization on short notice from other private or public sources, in the event of a radiological emergency, and state the grounds therefor.

136. Identify the level and type of sheltering capability which you would allege to be adequate for all residents in the plume EPZ and state the grounds for said allegations.

137. Identify the manner in which present sheltering capability is alleged not to be adequate and state the grounds for said allegations.

138. State whether and what types of alternate sheltering capability have been considered by intervenors in determining that present sheltering capability is not adequate, including, without limitation:

- (a) basements of homes;
- (b) basements of businesses; and
- (c) basements of public buildings.

139. Identify all conditions which would constitute a "degraded" roadway network, as set forth in Contention 4.2(c).

140. Identify the manner in which the roadway network should be upgraded to permit successful evacuation of all residents in the EPZ before the plume arrival time.

141. Identify:

(a) the "plume arrival time," as set forth in Contention 4.2(d); and

(b) the "shortest plume arrival time," as set forth in UCS/NYPIRG Contention III (A)(f);

and state the grounds for such time estimates.

142. Identify all weather conditions and combinations of conditions which you allege would impair the ability of the public to promptly evacuate the plume EPZ; the nature of such impairments; the manner in which such impairments would occur; the probability of the occurrence of such weather conditions and combinations of conditions; and the manner of calculation of such probabilities.

143. Identify the particular "license conditions" which you propose to prohibit power operation of Indian Point Units 2 and 3 when the roadway network becomes degraded because of adverse weather conditions.

144. State the grounds for your allegation that the present roadway network is incapable of supporting an evacuation in the time period provided from the initiation of an accident to the time the plume reaches persons at risk for the most limiting accidents, and identify:

(a) the time period provided from the initiation of an accident to the time the plume reaches persons at risk;

(b) the "accident" and "most limiting accidents" referred to above;

(c) the number and location of persons "at risk";

(d) the maximum risk to the public health and safety which intervenors deem acceptable from the operation of a nuclear power plant;

(e) the maximum risk to the public health and safety which intervenors deem acceptable from non-radiological causes; and

(f) the method of calculation of items (a)-(e) above.

145. Identify and annex copies of all traffic engineering studies regarding any part of the road network within the plume EPZ and state the manner in which you have relied upon such studies in formulating your allegations regarding evacuation.

146. State the grounds for your allegation that many special institutions within the plume EPZ such as the Asthmatic Children's Foundation, will have extraordinary problems, and will be in greater danger due to the stressful requirements of a nuclear emergency and, without limitation:

(a) identify each such special institution, its location, and its population;

(b) identify each "stressful requirement of a nuclear emergency" and state the grounds for such allegations;

(c) identify each "greater danger" allegedly caused by a nuclear emergency and state the grounds for such allegations;

(d) identify all said "extraordinary problems"; and

(e) identify dangers to residents of said institution existing as a result of non-radiological factors and the manner in which said dangers are presently addressed.

147. State the grounds for your allegation that special institutions outside the plume EPZ will have special problems in dealing with a nuclear emergency and, without limitation:

(a) identify all such "special institutions," their location, and resident and non-resident population;

(b) identify all "special problems";

(c) state the grounds for your allegation that parents would be frantic and that institutional staff would be distracted by their own parental concerns; and

(d) identify the number of said institutional staff who have children and state the grounds for said allegations.

148. State the grounds for your allegation that specific steps must be taken, by NRC, State, and local officials to promote a public awareness that nuclear power plant accidents with substantial risks are possible at Indian Point and, without limitation:

(a) Identify all such "specific steps";

(b) for each such "specific step", identify the particular jurisdiction (e.g., NRC, State, municipality) and the official thereof who should promote such awareness, and the specific statutory or regulatory authority enabling each such official to promote such awareness;

(c) identify all "nuclear plant accidents with substantial risks" and the probability thereof; and

(d) annex a copy of the early draft of NUREG-0660 cited in the basis for UCS/NYPIRG Contention I(B)(7).

149. Identify "the degree of change of practice" by the Commission with respect to emergency planning, as set forth in the basis for UCS/NYPIRG Contention (I)(B)(7).

150. Identify all safety-grade standards alleged to be necessary for each appropriate item of emergency planning hardware, the costs thereof, and the time schedule in which safety-grade changes could be implemented, and state the grounds for such allegations.

151. State the grounds for your allegation that a maximum acceptable level of radiation must be established

before any objective basis will exist for adequate emergency planning and, without limitation:

(a) identify the maximum level of radiation exposure that should be established for adults and for children, and state the grounds therefor;

(b) identify all changes in emergency planning or the evaluation of emergency planning which should be implemented upon establishment of such a maximum level;

(c) state whether you contend that a different maximum level should be established for nuclear power plant sites other than Indian Point, and state the grounds for your allegations; and

(d) identify the "objective basis" which should exist and why it is necessary; and

(e) state why the Environmental Protection Agency guidelines (EPA 520/1-75/001) fail to provide an objective basis for adequate emergency planning.

152. Identify all present means of alerting and informing the population of an emergency.

153. State the grounds for your allegation that only requisite improvements in the roadway network can remedy purportedly unacceptable risks, including without limitation, (a) identification of the "requisite improvements;" and (b) a statement of all other remedies considered in making such a conclusion.

154. State the grounds for your allegation that sheltering as a protective action, as outlined NUREG-0654 and

as developed in the RCRERP Rev. 1, is inadequate in major releases of radiation.

155. Identify the "major releases of radiation" for which sheltering is alleged to be inadequate; the probabilities of such major release; and the method of calculation of such probabilities.

156. Identify all protective actions which would be adequate in major releases of radiation.

157. State the grounds for your allegation that the air turnover rate in the standard residence permits infiltration of airborne contaminants such as radionuclides and, without limitation:

(a) identify the "standard residence" referred to above;

(b) identify the "air turnover rate" and state the grounds upon which said rate was calculated;

(c) identify the rate of infiltration of airborne contaminants and state the grounds upon which said rate was calculated; and

(d) identify all "airborne contaminants" referred to above, and state the grounds for your allegations that said contaminants could infiltrate the standard residence.

158. State the grounds for your allegation that there are no feasible offsite procedures which can adequately protect the public, and without limitation:

(a) identify all options considered in reaching your conclusion;

(b) for each such option set forth in paragraph (a), state the grounds for your conclusion that said option is inadequate;

(c) identify all offsite emergency procedures which can adequately protect the public, regardless of feasibility; and

(d) identify the level of protection which you deem "adequate".

159. State the criteria used for determining:

(a) what constitutes a "protective measure";

(b) what constitutes "feasibility", including without limitation, economic costs or cost/benefit analysis data, technological criteria, and scheduling criteria; and

(c) what constitutes a "feasible protective measure".

160. State the grounds for your allegation that straightening of roads and leveling of mountains are needed and, without limitation:

(a) identify all roads which require straightening, the costs of such straightening, and the time schedule in which it could be accomplished;

(b) identify all mountains which require leveling, the costs of such leveling, and the time schedule in which it could be accomplished; and

(c) state the specific manner in which the straightening of roads and leveling of mountains would improve the level of offsite emergency planning including, without limitation, the effect on evacuation time estimates and identification of all supporting documents.

161. State the grounds for your allegation that the terrain is such that there is no way to protect the public because it cannot evacuate on the present antiquated roads, and, without limitation:

(a) identify all "antiquated roads";

(b) identify all accident scenarios under which public evacuation would be necessary, the probability of the occurrence of each such accident, and the number and location of persons to be evacuated for each such accident.

162. State the grounds for your allegation that the emergency plans should be upgraded by taking account of special groups with special needs in emergencies and, without limitation:

(a) identify all such "special groups";

(b) identify each "special need" associated with each such special group; and

(c) identify the number of persons in each special group and their geographical concentration.

163. Identify all provisions which must be made for evacuating persons who are dependent upon others for their mobility.

164. Identify all accident scenarios, and the probabilities thereof, under which persons who are dependent upon others for their mobility should be evacuated.

165. Identify all other protective action measures considered for persons dependent upon others for their mobility, and the grounds for your conclusion that evacuation would be necessary.

166. Identify by number, category, and geographical concentration all persons who are dependent upon others for their mobility, and state the grounds for such allegations.

167. With respect to WESPAC Contention 6, identify:

(a) all "meaningful groups," including, without limitation, numbers and geographical location and all documents upon which said contention is based;

(b) all "attributes of groups which bear heavily on the feasibility of evacuation strategies";

(c) all persons, including without limitation, number and geographical location, "whose circumstances would leave them behind as the majority flee" and all documents upon which said allegation is based; and

(d) all "circumstances" referred to in paragraph (c), above.

168. With respect to any institution (including, without limitation, hospitals; nursing homes; prisons; the Asthmatic Children's Foundation Home in Ossining; the Blythedale Children's Hospital in Valhalla; and the New York School for the Deaf in White Plains) for which deficiencies in emergency planning allegedly exist:

(a) identify all deficiencies in emergency planning for that institution;

(b) state the grounds for your allegation that the staff is depleted;

(c) identify the level of staffing which you would deem adequate;

(d) identify the present level of planning for non-radiological emergencies and state whether the present level of planning is adequate to protect the population in non-radiological emergencies; and

(e) if your answer to (d) above is in the affirmative, identify the factors that distinguish radiological emergencies and state the grounds for your allegations.

169. State the grounds for your allegation that the walls of the Ossining Correctional Facility would not provide adequate shielding from radiation for persons therein.

170. Identify the protective action measures for persons present in the Ossining Correctional Facility which would provide adequate protection.

171. Identify by number and category the patients at the Franklin Delano Roosevelt Hospital who could not be evacuated.

172. Identify the categories (including, without limitation, nursing home residents, senior citizens and blind persons), number, and geographical concentration of persons who would need assistance in the event of a radiological emergency, and identify the type of assistance that would be necessary.

173. With respect to each category of persons referred to in interrogatory no. 172, above:

(a) State the grounds for your allegation that they would need assistance;

(b) state the level of planning which you would deem adequate;

(c) identify the present level of planning for non-radiological emergencies and state whether the present level of planning is adequate to protect the population in non-radiological emergencies; and

(d) if your answer to (c) above is in the affirmative, identify the factors that distinguish radiological emergencies and state the grounds for your allegations.

174. With respect to each park or other outdoor recreation area for which radiological emergency planning is alleged to be necessary:

(a) for each of the four seasons identify the estimated average number of persons present on weekdays;

(b) for each of the four seasons, identify the estimated average number of persons present on weekend days;

(c) identify the means of transportation used to arrive there;

(d) state the grounds for your allegations in (a)-(c) above; and

(e) state the grounds for your allegation that communication with and evacuation for such persons would be impossible.

175. State the grounds for your allegation that reception centers and congregate care centers are not equipped with emergency supplies, and, without limitation:

(a) identify all "emergency supplies" with which such centers should be equipped; and

(b) state whether such centers can be equipped with supplies subsequent to their activation.

176. Identify all problems associated with the evacuation and response of children and those entrusted with their care during a radiological emergency.

177. State the grounds for your allegations that problems associated with the response of children and those entrusted with their care would occur during a radiological emergency and, without limitation:

(a) identify by category "those entrusted with their care";

(b) identify the age group encompassed by "children";

(c) identify by number, percentage of the total plume EPZ population, and geographical concentration, the population of children within the plume EPZ and state how such population percentage compares numerically with all other nuclear power plant sites in the United States; and

(d) state whether the problems associated with the response of children and those entrusted with their care during a radiological emergency differ from such problems during a non-radiological emergency, and if your answer is in the affirmative, state the grounds for your allegations.

178. State the grounds for your allegation that effective drills are precluded because they can only simulate one situation at a time and the variant atmospheric and other

circumstances surrounding an accident are many, and, without limitation, identify all "variant atmospheric and other circumstances" which should be simulated in drills, and the grounds for your allegations.

179. Identify the number and percentage of residents of the plume EPZ who are employed outside the plume EPZ and without limitation:

(a) identify the geographical concentration of such residents' employment outside the plume EPZ;

(b) state the manner in which this fact would have an adverse impact, if any, on emergency planning and on the evacuation time estimates; and

(c) state the grounds for your allegations.

180. Identify:

(a) each person whom you expect to call as a witness at the evidentiary hearings relating to Commission Questions 3 and 4 (including, without limitation, each such person's full name, present address, present employment or other professional affiliation, and qualifications) and annex a copy of said person's resume and list all his publications;

(b) the subject matter and Board contention and underlying intervenor contention on which the witness is expected to testify;

(c) the substance of the facts and opinions to which the witness is expected to testify and a summary of the grounds for each opinion;

(d) each document (including, without limitation, each treatise, book, bulletin, accounting interpretation, regulation, report, article, or other literature or writing) upon which the witness has based his testimony, or will so rely at the hearing, or will otherwise refer to in support of his testimony;

(e) any relationship between the witness and any intervenor or party herein; and

(f) any proceeding in which the witness has previously testified and the transcript pages of such testimony (you should annex the transcript pages to your response).

181. State the grounds for each of the following Board contentions: (If the grounds for such contention are entirely set forth in a response to a prior interrogatory or interrogatories, you may respond by listing the number(s) of said interrogatory or interrogatories.)

Board Contentions 3.1; 3.2; 3.3; 3.4; 3.6; 3.7; 3.9; 4.1; 4.2; 4.3; 4.4; 4.5; 4.6; and 4.7.

182. State the grounds for each of the following contentions: (If the grounds for such contention are entirely set forth in a response to a prior interrogatory or interrogatories, you may respond by listing the number(s) of said interrogatory or interrogatories.)

(a) UCS/NYPIRG I(A), I(B)(1), I(B)(2); I(B)(C), I(B))(6), I(B)(7), II(A), II(B), III(C), and III(A);

(b) WESPAC 1, 2, 3, 4, 5, and 6;

(c) Parents I bases (2), (4)-(7), (15), (22), II, basis (7), and III;

(d) RCSE (1), (2), (3), (4) and (5);

(e) WBCA filing dated January 11, 1982: 1, 3, 4 and 5; and

(f) FOE/Audubon I.

183. Identify all communications, written or oral, with federal, state, county, or local government officials, upon which you rely in responding to any interrogatories.

184. Identify and state the ground for all alleged inadequacies and deficiencies in emergency planning identified as a result of the March 3, 1982 emergency planning exercise.

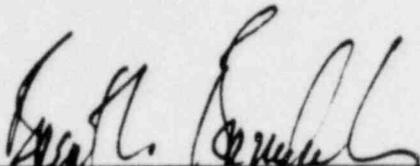
LICENSEES' DOCUMENT REQUEST

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 response to any interrogatories set forth above.

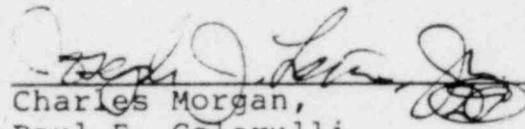
Each document so produced shall have affixed to it a legend stating the interrogatory or interrogatories (and subparagraph or subparagraphs thereof) to which it relates.

It is requested that the aforesaid production be made on May 24, 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

CONSOLIDATED 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,) 50-247 SP
INC. (Indian Point, Unit No. 2)) 50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK)
(Indian Point, Unit No. 3)) May 3, 1982
)

CERTIFICATE OF SERVICE

I hereby certify that copies of LICENSEES' INTERROGATORIES AND DOCUMENT REQUEST UNDER COMMISSION QUESTIONS 3 AND 4 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

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

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

Joan Holt, Project Director
Indian Point Project
New York Public Interest
Research Group
5 Beekman Street
New York, N.Y. 10038

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

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

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

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

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

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

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

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

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

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

Alfred B. Del Bello
Westchester County Executive
Westchester County
148 Martine Avenue
White Plains, N.Y. 10601

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.
Botein, Hays, Sklar & Herzberg
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

Atomic Safety and Licensing
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
P.O. Box 125
Croton-on-Hudson, N.Y. 10520

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

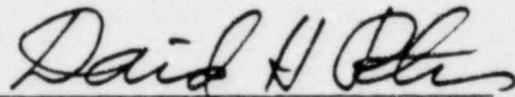
Alan Latman, Esq.
44 Sunset Drive
Croton-on-Hudson, N.Y. 10520

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


David H. Pikus

* Service effected by Express Mail.