

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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

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In the Matter of

Consolidated Edison Company of
New York (Indian Point Unit 2)

Power Authority of the State of
New York (Indian Point Unit 3)

Docket Numbers 50-247SP
50-286SP

May 3, 1982

WESPAC'S INTERROGATORIES FOR

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY



On April 23, 1982 the Atomic Safety and Licensing Board issued a Memorandum and Order Formulating Contentions, Assigning Intervenors, and Setting a Schedule for the above-captioned proceeding. The Board ordered that formal discovery was to begin on April 26, and that all interrogatories on "matters under Commission Questions 3 and 4" be filed by May 3, although "discovery on matters to be heard later than the week of June 22 shall continue." (Board 4/23 order at 22, footnote 5). WESPAC received this order on the evening of April 28, two working days before the filing deadline.

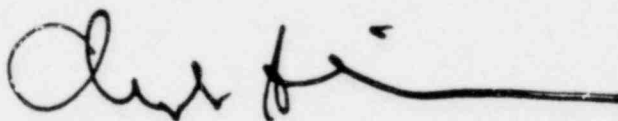
WESPAC hereby requests that the Port Authority of New York and New Jersey answer each of the following interrogatories in accordance with the foregoing and in line with the Federal Rules of Civil Procedure as soon as possible, but in no event later than May 31, 1982.

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1. List any transportation facilities (including railroads, automobile roads, highways, airports, bridges, tunnels, or other parts of a road network) under the jurisdiction of the Port Authority that are wholly or partly within Westchester or Putnam County. Where facilities are run by other agencies but are related to the Port Authority, include them.

2. Indicate which, if any, of the items listed in (1) are within the currently-defined Emergency Planning Zone for Indian Point.
3. Indicate which, if any, of the items listed in (1) are involved in any of the evacuation routes for the Indian Point Radiological Emergency Plan.
4. Supply copies of any reports, telephone calls, memoranda, or other communication between the Port Authority and PASNY, Con Edison, the Four-County Nuclear Safety Committee, or the two consultants (Parsons, Brinkerhoff, Quade, & Douglas and EDS Nuclear) relative to the use of MTA facilities in the offsite emergency plan. Such reports should include at minimum the following:
 - (i) Any information requested as to road capacity, traffic control personnel, and other transportation network data, whether or not the Port Authority was able to supply it, and the Authority's response.
 - (ii) The requirements for Authority personnel to participate in emergency response.
 - (iii) Training of Authority personnel as to their roles in emergency response to an Indian Point accident.
5. Please list all closings or delays in the Port Authority facilities listed in (2) or (3) due to construction, breakdowns, labor actions, operator error, or adverse weather for the past five years. Include the cause, effect, and duration of the disruption of service. Indicate what steps were taken to compensate. If the records are available, list all such closings since 1962, the year Indian Point Unit 1 began operation.

6. For the Trans-Hudson crossings under Port Authority Control (George Washington Bridge, Holland Tunnel, and Lincoln Tunnel), give the number of cars per lane per hour for normal and peak traffic times. How much does one lane blockage affect that number? If an accident at Indian Point were to cause self-evacuation from Manhattan which would double the normal number of cars using these facilities above an average rush hour, how long would it take for this number of cars to cross the river? Please provide the methodologies and/or references used in making these calculations.
6. Is the Port Authority confident that the transportation facilities it is involved with would perform satisfactorily in the event of an accident at Indian Point? If not, what improvement would the Authority like to see?

Respectfully Submitted,



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Co-Chairperson

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914/682-0488

May 3, 1982