

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 VILLAGE OF BUCHANAN



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.

We have put together a number of discovery interrogatories which are asked within this filing. Since hearings on matters relating to Commission Questions 3 and 4 will undoubtedly take longer than the week of June 22, we would like to be able to ask interrogatories on these issues after this initial May 3 filing deadline.

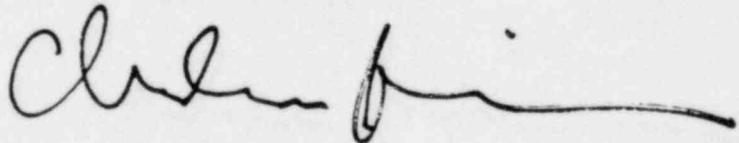
WESPAC hereby requests that the Village of Buchanan, New York, answer each of the following interrogatories in accordance with the foregoing and in line with the Federal Rules of Civil Procedure as soon as possible, but in no event later than May 31, 1982.

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1. How many dollars does the Village annually receive in property taxes from Consolidated Edison? How much of this is related to the Indian Point nuclear facility? What percentage is it of the total village revenue?
2. How many dollars does the Village annually receive in property taxes or payments in lieu of taxes from the Power Authority of the State of New York? How much of this is related to the Indian Point nuclear facility? What percentage is it of the total village revenue?
3. Supply copies of any reports, telephone calls, memoranda, or other communication between the Village of Buchanan (including the Police and transportation authorities) and PASNY, Con Edison, the Four-County Nuclear Safety Committee, or the two consultants (Parsons, Brinkerhoff, Quade, & Douglas and EDS Nuclear) relative to Buchanan's role 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 Village was able to supply it, and the Village's response.
 - (ii) Any information requested as to Village residents with special needs as regards transportation (See WESPAC's Interrogatory Numbers 7 and 9 to Con Edison) or notification (see WESPAC's Interrogatory Number 10 to Con Edison), whether or not the Village was able to supply it, and the Village's response.
 - (iii) The requirements for Village personnel to participate in emergency response.
 - (iv) Training of Village personnel as to their roles in emergency response to an Indian Point accident.
4. Provide information on the road network in the Village of Buchanan, including:
 - (i) The automobile-carrying capacities of all roads in the Village which are used as evacuation routes under the Indian Point Emergency Plan.

- (ii) The capacities of intersections, particularly entrances onto Route 9, which are used as parts of evacuation routes.
 - (iii) The number of traffic control officers required to implement Buchanan's part of the Plan.
- 5(a) Does the Buchanan Police Department have adequate personnel to meet its role under the emergency plan?
- 5(b) Please indicate where they would be stationed, and how long each police officer would be able to stay at his/her post.
6. Please list all closings of Buchanan roads which would be involved in evacuation due to construction or adverse weather for the past five years. If the records are available, list all such closings since 1962, the year Indian Point Unit 1 began operation.
- 7(a) How much does the development of the Indian Point Emergency Plan cost the Village of Buchanan?
- 7(b) What is the projected cost per year to keep the plan operational and updated?
8. Is the Village of Buchanan (including the Mayor, Board of Trustees, and Police Department) confident that the health, safety, and homes Buchanan residents would be safeguarded in the event of an accident at Indian Point? If not, what improvement would the Village like to see?

Respectfully Submitted,



Charles A. Scheiner
Co-Chairperson