

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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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 19, 1982

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LICENSEES' RESPONSES TO INTERROGATORIES OF
WEST BRANCH CONSERVATION ASSOCIATION

ATTORNEYS FILING THIS DOCUMENT:

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PRELIMINARY STATEMENT

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 (the "Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), submit these responses to the "Interrogatory to the Licensees from the West Branch Conservation Association". The following are general comments or objections applicable to interrogatories of the West Branch Conservation Association ("WBCA").

A. Emergency Planning Responsibilities

The WBCA interrogatories in many instances reflect a fundamental misapprehension as to the various responsibilities for radiological emergency planning both generically and at Indian Point in particular. Although the Commission ultimately maintains licensing jurisdiction over nuclear power plants, the licensees' responsibility for and jurisdiction over emergency planning terminates at the site boundary. Pursuant to State law and consistent with federal regulations, the State of New York maintains primary responsibility for off-site radiological emergency planning (see N.Y. Executive Law, art. 2-B). Radiological emergency response plans and procedures

("RERP's" or "plans") for the four counties surrounding Indian Point are annexed to the State plan.

Accordingly, many of the interrogatories relating to off-site emergency planning were misdirected to the licensees. The information sought, if available, would be more appropriately obtained from the governmental authorities responsible for off-site emergency response.

Nevertheless, much of the information sought may be found in the off-site emergency plans themselves, with which the licensees are familiar. Accordingly, where information is known on such a basis, we have attempted in an effort to expedite discovery to respond to the interrogatories concerning those plans, primarily by reference to portions of the plans.* We continue to note, however, that the off-site authorities

* This approach is analogous to the general principle of responding to interrogatories, which permits reference to documents as an answer where the answer may be derived or ascertained from such documents. See, e.g., Fed. R. Civ. 33(c), which states:

Option to Produce Business Records. Where the answer to an interrogatory may be derived or ascertained from the business records of the party upon which the interrogatory has been served or from an examination, audit or inspection of such business records, including a compilation, abstract or summary thereof, and the burden of deriving or ascertaining the answer is substantially the same for the party serving the interrogatory as for the party served, it is a sufficient answer to such interrogatory to specify the records from which the answer may be derived or ascertained and to afford to the party serving the interrogatory reasonable opportunity to examine, audit or inspect such records and to make copies.

are the more appropriate sources for this type of information.

B. Document Production

In a number of instances WBCA has served interrogatories which are, in effect, requests for production of documents. We note that while 10 CFR § 2.740(b) requires responses to interrogatories within 14 days, 10 CFR § 2.741 allows 30 days for responses to document requests.* Accordingly, the licensees do not intend to produce documents or make objections, except as otherwise specified, at this time. We are prepared, while reserving any claims of privilege or other objections to such production, to consider a future time and location for the production of documents, in accordance with 10 CFR Part 2 and the convenience of the parties. In fact, since the licensees believe that documents WBCA has requested may also be encompassed by other intervenors' document requests, it may be in the interest of all parties to coordinate such requests.

C. Assumptions and Statements by WBCA

Many WBCA interrogatories contain purported factual statements and assumptions (See, e.g. 4.4-4). While such statements are improper, Licensees have attempted to respond to the underlying question(s). In so doing, however,

* Of course, where the due date for document production lies beyond the Board's May 31, 1982 date for close of discovery under Commission Questions 3 and 4, the May 31 date should control.

Licensees do not admit the truth of any matter contained
in the body of any interrogatory itself.

INTERROGATORY WBCA-3.2-1

What provisions have been made in the Rockland County RERP to make it safe for operating personnel to remain in the generating station at Lovett? and at Bowline? during a "general emergency"? Please answer for a 2 mile evacuation, a 5 mile evacuation and a 10 mile evacuation.

RESPONSE:

The same provisions in the Rockland County RERP that apply to the general population also apply to the operating personnel at Lovett and Bowline.*

* Since this interrogatory is limited to the Rockland County RERP, Licensees' Response should not be interpreted as indicating that there are no provisions independent of the RERP for the protection of operating personnel at Lovett and Bowline and for the continuation of electric service to the affected areas.

INTERROGATORY WBCA-3.2-2

Up to what level of radiation exposure will the employees be allowed in order to maintain operation? Who will make the decision in the RERP? Have you the informed consent of the employees who are expected to remain at Indian Point? If so, please supply a consent form sample or the text of any letters of agreement.

What percent of the employees needed on the site during an emergency have signed agreements? Are there enough such employees on all shifts to continue operation of the plants at Indian Point?

RESPONSE:

In respect to the first two parts of this interrogatory, the Licensees assume reference is to Lovett & Bowline employees. The same provisions in the Rockland County RERP that apply to the general public apply to those employees. All decisions on permissible radiation exposures of the public will be made in accordance with the RERP by the Commissioner of Health with the guidance of the EPA Protective Action Guides.

With respect to Indian Point operating personnel, all have received health physics training and radiological emergency response training. No formal consent form is required by regulation and none is used. There are sufficient trained employees to continue operations on all shifts.

INTERROGATORY WBCA-3.2-3

What on-site provisions are there to decontaminate emergency personnel at Lovett and Bowline?

Have they dosimeters or film badges?

RESPONSE:

The licensees have no knowledge regarding onsite provisions to decontaminate emergency personnel, if any, at Lovett & Bowline. Likewise, the licensees have no knowledge of whether they have dosimeters or film badges.

INTERROGATORY WBCA-3.2-4

Have the above described emergency personnel received radiological emergency response training? If so, to what level of training? On what date or dates? For O & R stations? For Indian Point?

RESPONSE:

Licensees have emergency plan training programs to maintain the proficiency of emergency personnel at Indian Point. The training program consists of formal classroom lectures, field exercises, and drills. The type and extent of training each individual receives depends upon the specific duties assigned to that individual in the on-site Emergency Plan.

All onsite plant personnel, offsite licensee personnel who routinely visit the site, and extended onsite visitors (i.e., construction personnel, outage support personnel, etc.) receive an orientation program including familiarization with emergency alarms, the location of assembly areas, and accountability procedures. Emergency response training is generally received on an annual basis.

Licensees have no knowledge regarding radiological emergency response training of personnel at O & R stations.

INTERROGATORY WBCA-3.2-5

Please reply to 3.2-2 above as applied to emergency personnel expected to remain in Indian Point #2 and #3 generating stations during a "general emergency".

RESPONSE:

Radiological protection of operating and emergency personnel at Indian Point 2 is described in the Indian Point 2 Emergency Plan Plan, Sections 6.4, 6.5 and 7.4 and in Implementation Procedure 104.

Radiological protection of operating and emergency personnel at Indian Point 3 is described in the Indian Point Emergency Plan, Section 6.5, and in the Indian Point Emergency Procedures Document.

In the case of Indian Point 2, the Emergency Director, Plant Operations Manager or Recovery Manager will make decisions relating to worker exposure over 10 CFR Part 20 limits. (See Indian Point 2 Implementation Procedure IP 10-38). Decisions of this sort at Indian Point 3 are made by the Emergency Director (See Section 6.5.2 of the Indian Point 3 Emergency Plan).

INTERROGATORY WBCA-3.2-6

Refer to NUREG-0654, Rev. 1, Page 35 Evaluation Criteria 2. Are employees of the licensees informed and have they given consent to the extent that a full complement of shift workers is available at all times? If not, how will such volunteers who have consented reach the plant to assist in an emergency? Within what time frame can a full complement be assembled? Can each licensee meet the requirements of Table B-1 on pages 37 and 38 of NUREG-0654, Rev. 1? If not, in what numbers are each short?

RESPONSE:

We note, initially, that the reference to Page 35 Evaluation Criteria 2 appears to be in error.

A full complement of shift workers is available on site at all times in the event of an emergency at Indian Point No. 2 or 3. (See response to WBCA Interrogatory 3.2-2 regarding consent of on-site workers). The Licensees have been implementing the on-shift and 60-minutes staffing guidelines of Table B-1 of NUREG-0654 Rev 1 as a result of the NRC's February 11, 1980 Confirmatory Order. In addition, the Licensees are implementing the 30-minutes staffing guidelines of Table B-1 within 60 minutes also as a result of the aforementioned Confirmatory Order.

INTERROGATORY WBCA-3.3-1

- A. Please provide methodology used to arrive at Tables A-4, A-5, A-6, and A-7 on pages A-67, A-68, A-69, and A-70 in Rockland County RERP.
- B. Copies of working papers to show what populations are assumed and for what situations.
- C. List "Operational Strategies" referred to in Footnote (1) below each of the tables.

RESPONSE:

- A. The methodology used to arrive at Tables A-4 through A-7 in the Rockland County RERP may be found in the draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone." See, Licensees' Response to UCS/NYPIRG First Set of Interrogatories and Addendum Thereto at 3n*.
- B. See page 3, above concerning production of documents.
- C. The "operational strategies" referred to in footnote (1) below each of the evacuation travel time estimate tables are the agency evacuation procedures contained in Attachment 1 of each Rockland County RERP agency implementation procedure.

INTERROGATORY WBCA-3.3-2

Kindly provide total population estimated to be in Rockland County within the 10 mile EPZ. In Rockland County RERP Appendix G please designate which sector's zones were used to define the boundary of Rockland County.

RESPONSE:

As shown in Table K-1 of the Rockland County Radiological Emergency Response Plan (Rev. 1), the estimated 1980 population for the portion of Rockland County in the plume EPZ is 92,993.

With reference to the Rockland County RERP (Rev. 1) Appendix G, the following sectors/zones roughly define the Rockland County portion of the plume EPZ:

H5 part, H6 part, H7 part, H8 part, H9 part, H10 part, and H15 part.

J3 part, J4 part, J5, J6, J7, J8, J9, J10, and J15 part

K2 part, K3, K4, K5, K6, K7, K8, K9, K10, and K15 part

L2 part, L3, L4, L5, L6, L7, L8, L9, L10, and L15 part

M2, M3, M4, M5, M6, M7, M8 part, M9 part, M10 part, and M15 part

N2, N3, N4, N5 part, N6 part, and N7 part

P2, P3, P4, and P⁵ part

Q2, Q3, and Q4 part

R2, R3 part, and R4 part

INTERROGATORY WBCA-3.9-1

1. What studies were made of road evacuation routes and characteristics as shown in NUREG-0654, Rev. 1, pages 4-15 and 16, Tables 1 and 2 for Rockland?
2. What studies were made for the above under different weather conditions such as 1-rain, 2-snow, 3-ice, and 4-fog on Rockland's evacuation routes?
3. Show if studies did or did not include width of roads, shoulder conditions, room for disabled vehicles to pull over, crest down center of road.
4. Which roads were actually traveled?
5. Why are the road names in the brochures not correct where road names change? Were all directions in the brochure checked for correct names? For correct turns?
6. Please explain why there are errors on the brochure map for southern Rockland within the EPZ.
7. How was the capacity determined for each road?
8. Were any field counting studies made during commuting hours? 7-8:30 AM? 5-7 PM? If so, please list where, under what conditions and on what dates?
9. How was capacity integrated with population and road characteristics within the EPZ?

RESPONSES: 1, 3, 4

For Rockland County, as well as the other three counties in the Indian Point plume EPZ, studies were made of all evacuation and bus routes included in the RERP. Each primary evacuation route, backup evacuation route, and bus route was field-checked to determine its adequacy for the purpose it was intended to serve. Primary and backup

RESPONSES: 1, 3, 4 (continued)

routes were surveyed to determine the number of lanes, lane widths, shoulder width, locations and (if applicable) timing of traffic controls, and posted speed limit. Bus routes were surveyed to determine length, location of existing transit stops, adequacy of stops and coverage, locations of major concentrations of potential users, street names and signing, tight turns, narrow or congested streets, one way streets, low clearance bridges, low weight limit bridges, and other operating restrictions. All roads designated as primary or backup routes, and all bus routes, were actually traveled during the field reconnaissance.

RESPONSES: 5, 6

Comment cannot be made concerning incorrect road names and other errors on the brochure map for southern Rockland County within the EPZ without knowing specifically which items are considered to be in error.

The brochure maps for Rockland County were checked against the Hagstrom Map of Rockland County, and County of Rockland Road Map prepared by the Rockland County Planning Board and the Rockland County Highway Department (dated May 1974), and supplemented by field checks when necessary.

RESPONSES: 2,7

The method to calculate the capacity for each road under normal and adverse weather conditions, is described in draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone" in Section III A1 (Evacuation Capacity Analysis) and Appendix E (Methodology to Calculate Evacuation Capacities).

RESPONSE: 8

Field traffic count studies were not conducted by Parsons Brinckerhoff because adequate counts were available from State and County sources.

RESPONSE: 9

The method to calculate evacuation travel time estimates integrates information about the roadway network characteristics (including capacity) and the population, which varies by scenario. The manner in which this information is integrated and analyzed is described in the draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone."

INTERROGATORY WBCA-4.3-1

Please list the most difficult to solve patterns and the roads involved. Those that were the least amenable to their burden, from 1, the worst, through 10 and relate if they vary in difficulty on a 1-10 scale. At what location is there potential for serious congestion? It is due to road configuration? Due to the amount of vehicles using the road? Or both? Please explain.

RESPONSE:

It is not understood what is meant by "the most difficult to solve patterns" and patterns "least amenable to their burden".

The locations where there is potential for maximum congestion are identified in Section IV 1 (Critical Locations) in the draft document "Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone".

Congestion is due to a combination of the number of vehicles using the road at a given point (demand), and the capacity of the road at that point. A roadway with a very low capacity will not be congested if the demand is far below its capacity. Conversely, a very high demand will not cause congestion unless the capacity is inadequate to service the demand.

INTERROGATORY WBCA-4.4-1

Please supply a copy of each emergency assistance card sent to the "Four County Nuclear Safety Committee" from the brochures by residents of Rockland County.

RESPONSE:

The licensees have not received any of the subject cards. (See pp. 1-3 above regarding responsibilities for off-site emergency planning).

INTERROGATORY WBCA-4.4-2

Did you determine how many wheelchair users there are in Rockland's 10 mile EPZ? If so, what number did you determine and how did you arrive at it?

RESPONSE:

The number of wheelchair-bound patients and residents at special facilities (i.e., hospitals and nursing homes) located in the Rockland County portion of the plume EPZ is approximately 887. This figure was determined on the basis of information (average number of wheelchair patients/residents) provided by special facilities' administrators prior to August 1981. (See Rockland County RERP, Special Facilities Procedure, Attachment 1, Table 1: "Special Facilities in EPZ" for a breakdown of this figure.)

The Rockland Board of Cooperative Educational Services (BOCES)-administered Jawonio Center has 32 students in wheelchairs. (See Rockland County RERP, Schools Procedure, Attachment 1, Table 1: "Schools Located in EPZ.")

INTERROGATORY WBCA-4.4-3

The Rockland County RERP page Trl 24 lists Helen Hayes Hospital. The new building is now open, the lower line of occupants applies. Only 14 are ambulatory. The vehicles shown are insufficient to move the patients. Please provide a corrected figure and explain from where the transportation might be expected.

RESPONSE:

According to information obtained from the administrative offices of Helen Hayes Hospital, the facility owns the following vehicles:

- 2 vans - capacity of 5 wheelchair patients each
- 1 bus - capacity of 30 wheelchair patients
- 1 car - capacity of 4 patients
- 4 station wagons - capacity of 5 patients each
- 1 ambulance - capacity of 2 stretcher patients

On the basis of the total capacity of these facility-owned vehicles, the ambulatory and wheelchair patients of Helen Hayes Hospital could be evacuated in two round trips of 64 patients each trip.

Ambulance transport to supplement the 1 facility-owned ambulance would be provided by county ambulance corps under the coordination of the Rockland County Volunteer Ambulance Disaster Coordinator. Additionally, the Ambulance Coordinator could request assistance from Orange County which would have excess ambulance capacity in an evacuation.

INTERROGATORY WBCA-4.4-4

The Rockland County RERP page Trl 20 lists Camp Jawonio. It has 350 students at a session. 70 are in wheelchairs, 35 in crutches or braces, 245 are ambulatory but slow. Its bus capacity totals 18 wheelchairs. How will the wheelchairs be moved in the event of a general emergency.

RESPONSE:

Jawonio Center is listed on page Tr 1-20 of the Rockland County RERP. Information provided by Dr. Campo, District Superintendent of Schools of the Rockland Board of Cooperatives Educational Services (BOCES), as input to Revision 1 (August 1981) of that document, indicated that Jawonio Center has 32 multiple handicapped students, all of whom require special vehicles for evacuation. For purposes of evacuation, it has been preassigned 4 vans (which accommodate wheelchairs and/or have lap belts) from BOCES so that the students will remain in the care of BOCES employees who are familiar with their needs.

INTERROGATORY WBCA-4.4-5

What transportation plans are there for citizens who are permanently disabled and who live at home?

RESPONSE:

Citizens who are permanently disabled, live at home, and have no means of transportation (either through friends, relatives, etc.) can make their evacuation-related needs known by filling out and sending in the postcard attached to the emergency planning brochure mailed to all households in the plume EPZ. When this information is received from those people in the County requiring special assistance, the County Transportation Coordinator, in consultation with the appropriate health and social services agencies, will be able develop a coordinated and efficient approach for providing the necessary assistance.

INTERROGATORY WBCA-4.4-6

What is the length of time used to determine the ability to move a wheelchair patient into a van?

RESPONSE:

For the purposes of the evacuation travel time estimate calculations, the length of time used to load a van with wheelchair patients was 15 minutes.

INTERROGATORY WBCA-4.4.7

Much of the Plan expects to provide several trips to and from one location to evacuate the disabled, or even the school population. How will buses be able to return to the assigned pick-up place on roads clogged with evacuees?

How have you determined the use of police and sheriffs to cover all these tasks? What numbers?

RESPONSE:

Buses will be required to make more than one trip for only the school-in-session scenario, which occurs approximately 18% of the time. Under this scenario only, buses will first evacuate school children, and then return for the transit dependent general population and special facilities.

The RERP provides several procedures to facilitate the return of vehicles making second trips as described above. First, traffic control officers instructed to give priority to buses and emergency vehicles will be stationed at the EPZ boundary, traffic signal locations, host facilities, evacuation route access points, and upon request, schools and other major pickup points. Second, the individuals responsible for emergency transportation (e.g., Transportation Coordinator and Ambulance Coordinator) will be at the EOC with the County Sheriff, and will be informed of the quickest and least congested routes for travel. These EOC personnel can communicate information about

RESPONSE: 4.4-7 (Continued)

the fastest travel routes to drivers via the appropriate dispatchers. Third, all lanes of a roadway will not be used for outbound flow under the Plan, leaving inbound lanes for the return of emergency vehicles and buses to the evacuated area.

The use of all emergency personnel to cover these tasks is discussed in the appropriate implementation procedure for a given agency in the Rockland County RERP.

INTERROGATORY WBCA-4.4-8

Before the National Guard can be of assistance it will have to be mobilized and moved. These guardsmen may be otherwise occupied. In a "general emergency" how could they be mobilized in sufficient time to assist the police and sheriffs? What calculations were made to determine when they could be on the scene and in what numbers? Please supply data.

RESPONSE:

The licensees have no knowledge of procedures for mobilizing and moving the National Guard. (See pp 1-3, above, regarding off-site emergency planning).

INTERROGATORY WBCA-4.4-9

Please provide text of questionnaire used by door-to-door survey teams in Rockland County preparatory to any opinion study. How many homes or apartments were visited where interviews were completed? Please provide totals or tallies of results of replies to the questions asked.

RESPONSE:

See page 3, supra, regarding production of documents.

Four hundred and sixty one homes and apartments were visited.

INTERROGATORY WBCA-4.4-10

How many buses did Red and Tan Lines offer for an evacuation of the ten mile EPZ in Rockland?

How many school buses would be needed for a worst case emergency of a plume passing through Rockland County 10-mile EPZ?

What is the total number of buses that would be needed from outside the 10-mile EPZ in a worst case emergency?

RESPONSE:

Based on a letter received from Mr. Jay M. Day, Traffic Manager of Rockland Coaches, Inc., ("Red and Tan Lines") between 50 and 80 buses would be available at any time of day on weekdays. On the other days, 80 buses would be available, except from June 15 through Labor Day when 30 buses would be available.

Approximately 310 school buses would be needed for a worst case (i.e., full plume EPZ evacuation when school was in session) emergency in Rockland County.

The total number of buses garaged outside the plume EPZ that would be needed to evacuate the portion of Rockland County within the plume EPZ in a worst case emergency is approximately 150 buses.

INTERROGATORY WBCA-4.4-11

How many accidents or illnesses have you figured would occur on the roads during a "general emergency" that would require ambulance service? Per hour? Per sector? Would ambulances be available if the mode was to be moving the sick and those "dependent on others for their mobility"?

RESPONSE:

The number of accidents or illnesses that would occur on the roads and would require ambulance service was not calculated. It was assumed, however, that only 50% of the available ambulances would be used for evacuation purposes. The Rockland County Volunteer Ambulance Disaster Coordinator, with responsibility for coordinating ambulance resources during an evacuation, would thus provide ambulance transportation, as necessary, for any such accidents or illnesses. (See Ambulance Medical Service Procedure of the Rockland County RERP, Rev. 1.)

INTERROGATORY WBCA-4.7-1

Why wasn't the brochure printed in Spanish to be provided to the more than 6,000 Spanish speaking residents within the Rockland County 10 mile EPZ? How much would it cost for 2,000 copies? What is the total printing bill for the present brochure for four counties?

What mailing list was used for the brochure's distribution? Have you any estimate of how many residents within the 10 mile EPZ were missed?

RESPONSE:

The licensees have no evidence that there are substantial numbers of Spanish-speaking residents of Rockland County who live in households within the plume EPZ in which no person reads English. The cost of producing 2000 copies of the brochure in Spanish is not known to the licensees. It would include costs of translation, typesetting, creating maps marked in Spanish, as well as printing. The printing cost of the existing brochures was approximately \$75,400.

The customer billing lists of the four utilities (Con Edison, Orange & Rockland, NYSEG, & Central Hudson) for the portion of their service territories within and somewhat beyond the Plume EPZ were used. Based upon brochure mailings returned as undelivered, to the best of our knowledge approximately 97% of utility customers within the plume EPZ received the brochure.

INTERROGATORY WBCA-4.7-2

Describe the structure of the "Four County Nuclear Safety Committee". How often has it met in 1980, 1981 and 1982? Who are its officers? How were they elected? How many people from each of the four counties are on the Committee? Is there a Board of Directors? If so, how many are on it and how are they elected? Who may speak for it? By what grant of authority? Is it incorporated? If so, where?

RESPONSE:

The Four County Nuclear Safety Committee consists of the county executives of Westchester, Orange and Rockland County Legislature, the four counties' civil defense directors and the four counties' Health Commissioners. In 1980 Mr. Harvey Harth was appointed project coordinator. The licensees do not have a record of the committees meetings. The licensees have no further knowledge regarding the structure or organization of the Four County Nuclear Safety Committee.

As to Answers:

CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.

By



Richard P. Remshaw
Project Manager - Indian Point Hearings

POWER AUTHORITY OF THE STATE OF NEW YORK

By

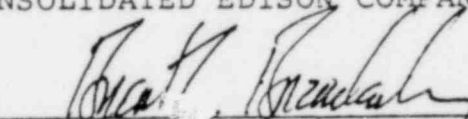


Herschel Specter
Project Manager - Indian Point Hearings

As to Objections:

CONSOLIDATED EDISON COMPANY OF NEW YORK INC.

By




Brent L. Brandenburg
Assistant General Counsel

POWER AUTHORITY OF THE STATE OF NEW YORK

MORGAN ASSOCIATES, CHARTERED

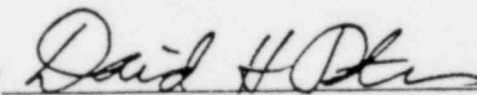
By



Joseph J. Lewis, Jr.

SHEA & GOULD

By



David H. Pikus

Attorneys for Power Authority of
the State of New York

VERIFICATION

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

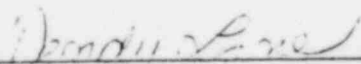
HERSCHEL SPECTER, being duly sworn, deposes and
says:

That he is the Project Manager - Indian Point
Hearings for Power Authority of the State of New York, licensee
of Indian Point 3 Nuclear Power Plant; that he is authorized to
make this verification on behalf of said Authority; and that
the foregoing answers to interrogatories are true and correct
to the best of his knowledge, information and belief.



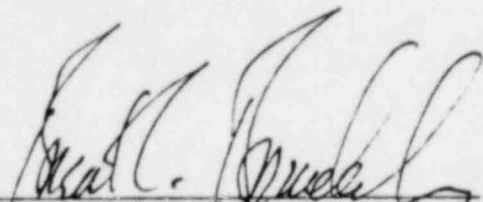
HERSCHEL SPECTER

Sworn to before me this
19th day of May, 1982.



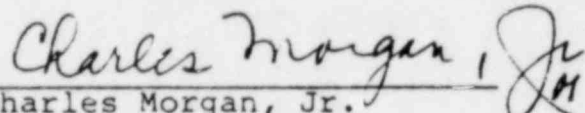
Notary Public

WENDY M. LANE
Notary Public, State of New York
No. 31-4687915
Qualified in New York County
Commission Expires March 30, 1983


Brent L. Brandenburg

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Respectfully submitted,


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Dated: May 19, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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WFA

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

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CONSOLIDATED EDISON COMPANY OF :
NEW YORK, INC. (Indian Point, : Docket Nos. 50-247-SP
Unit No. 2) : 50-286-SP
POWER AUTHORITY OF THE STATE OF : May 19, 1982
NEW YORK, (Indian Point, :
Unit No. 3) :
----- x

CERTIFICATE OF SERVICE

I certify that I have served copies of the "Licensees' Responses to Interrogatories of West Branch Conservation Association" on the following parties by first class mail, postage prepaid, this 19th day of May 1982.

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

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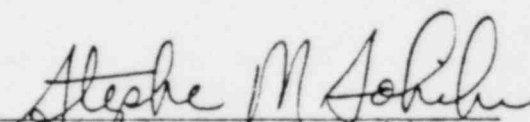
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