

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

DOCKETED  
SERIALIZED

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In the Matter of	X	
	X	Docket Nos.
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point, Unit No. 2	X	50-247 SP
	X	50-286 SP
	X	
POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3)	X	May 28, 1982
	X	
	X	

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OFFICE OF THE  
DOCKET CLERK

FOE/AUDUBON'S SUPPLEMENTAL RESPONSE  
TO LICENSEES' REQUEST FOR THE PRO-  
DUCTION OF DOCUMENTS

This written response is submitted subsequent to licensees' having had the opportunity on May 26, 1982 at 2:00 o'clock in the afternoon, at FOE's office located at 208 West 13th Street, New York, New York 10011, to inspect and copy the documents in possession and control of FOE/Audubon which were referenced in its May 18, 1982 ANSWERS TO LICENSEES' INTERROGATORIES BY FRIENDS OF THE EARTH AND NEW YORK CITY AUDUBON SOCIETY. Richard Czaja, Esq., who appeared for the licensees at FOE's office at the above date and time, requested this further written response. The following documents were made available to him at that time:

(a) From references to the answer to interrogatory #1:

(i) Information Bulletin from the New York City Energy Project, "potential Consequences of Nuclear Reactor

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Accidents Referenced to the Indian Point Reactors, April 7, 1980 (a copy of this document was provided to Mr. Czaja free of charge);

- (ii) Richard Webb, The Accident Hazards of Nuclear Power Plants, 1976 (this document was proffered to Mr. Czaja but he declined to inspect or copy it).

(b) From references to the answer to interrogatory #46:

- (i) Virginia Brodine, Radioactive Contamination, 1975;
- (ii) John Gofman, Radiation and Human Health, 1981;
- (iii) Zhores Medvedev, Nuclear Disaster in the Urals, 1979.

(These documents were also proffered to Mr. Czaja, but he declined to inspect or copy them)

FOE/Audubon does not have in its possession or control the following documents:

(a) From references in the answer to interrogatory #1:

- (i) WASH 740, revised, 1965 (a few pages of these materials were discovered in FOE's office subsequent to Mr. Czaja's appearance on May 26, 1982, and they will be made available for inspection and copying upon further request);
- (ii) WASH 1400, 1974;

(b) The citation in the answer to interrogatory #53;

42 F.R. 2558-61, Jan. 13, 1977 (Mr. Czaja indicated that he could readily obtain this document himself);

(c) The references in the answer to interrogatory #37:

- (i) Draft EIS by U.S.A.E.C., related to operation of Indian Point Nuclear Generating Plan, No. 3, Con Ed Docket No. 50-286, Oct. 1973;
- (ii) Consolidated Edison Co. of N.Y., Inc., Indian Point Nuclear Generating Unit No. 3, Preliminary Safety Analysis Report, Docket No. 50286--1, 1/15/68;
- (iii) "Turbulent Diffusion in Complex Terrain", Bruce Egan, Env. Res. & Tech., Inc., In Chapter 4 of Lectures on Air and Environmental Impact Analysis.

Mr. Czaja indicated that he had access to the NRC documents, NUREG-0396 and NUREG-0654, FEMA-REP-1.

With regard to references in FOE/Audubon's answers to licensees' interrogatories related to emergency plans for the Indian Point nuclear power plants, we note licensees' responses to FOE/Audubon's interrogatories which indicate that these plans are available for inspection and copy at the White Plains Public Library.

Submitted by:

*Richard M. Hartzman*

Richard M. Hartzman, Esq.  
Attorney for FOE/Audubon  
Friends of the Earth, Inc.  
208 West 13th Street  
New York, N.Y. 10011

Dated: May 28, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DUPLICATE  
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

RECEIVED  
DOCUMENTS & SERVICE  
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In the Matter of	)	
	)	
CONSOLIDATED EDISON COMPANY OF NEW YORK	)	Docket Nos. 50-247 SP
(Indian Point Unit 2)	)	50-286 SP
	)	
POWER AUTHORITY OF THE STATE OF NEW YORK	)	
(Indian Point Unit 3)	)	May 28, 1982

Certificate of Service

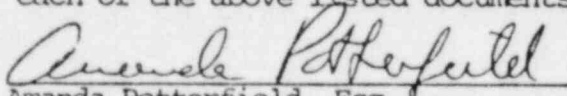
I hereby certify that copies of:

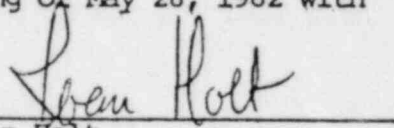
UCS/NYPIRG SUPPLEMENTARY INTERROGATORIES TO CON EDISON  
AND PASNY

UCS/NYPIRG MOTION TO COMPEL DISCOVERY PURSUANT TO 10 C.F.R.  
2.740(f) and MEMORANDUM IN SUPPORT OF MOTION TO COMPEL DISCOVERY

FOE/AUDUBON SUPPLEMENTAL RESPONSE TO LICENSEES' REQUEST  
FOR THE PRODUCTION OF DOCUMENTS

have been served on the official minimum service list for the above captioned proceeding by depositing in the United States mail, first class, this 28th day of May 1982. The judges of the Atomic Safety and Licensing Board were each mailed a copy of the UCS/NYPIRG Motion to Compel and Memorandum in Support of Motion to Compel Discovery by Express Mail on May 27, 1982. Mr. Brandenburg for Con Edison and Mr. Pikus of Shea and Gould for PASNY were served by hand on the morning of May 28, 1982 with each of the above listed documents.

  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

'82 JUN -1 11:45

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 Nos. 50-247 SP  
50-286 SP

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