

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

ANSWERS AND OBJECTIONS
TO INTERROGATORIES AND
DOCUMENT REQUESTS PROPOUNDED
BY UCS/NYPIRG TO THE
STATE OF NEW YORK

On May 3, Union of Concerned Scientists - New York
Public Interest Research Group (UCS/NYPIRG) mailed interrogatories
directed to the State of New York. The State of New York hereby
responds with its answers and objections to the interrogatories
and document requests propounded by UCS/NYPIRG.

It should be emphasized that the State of New York is
not a party to this proceeding since it is participating as an
interested state pursuant to 10 CFR § 2.715(c). Interrogatories
such as those served upon the State of New York can be filed by
parties on parties under §2.7406. The production of documents can
only be requested by parties from parties under §2.741. The State
is not a party and therefore is not bound to answer these
discovery requests. However the State recognizes that it should
as part of the exercise of its emergency planning function
participate in this proceeding and cooperate with reasonable
inquiries related to emergency planning. The State therefore
responds below to UCS/NYPIRG's interrogatories and document
requests. By responding, the state does not relinquish any

protection against discovery it has as an "interested state" in this or other contexts, such as access to state facilities during emergency exercises.

There are some objections to the UCS/NYPIRG discovery requests. These are made below. All objections are made by the undersigned. All answers were prepared by Donald Davidoff and an affirmation to that effect is attached.

Respectfully submitted,

STANLEY KLINBERG
General Counsel
NYS Energy Office

Jonathan D. Feinberg
By JONATHAN D. FEINBERG
Staff Counsel
NYS Department of Public Service

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

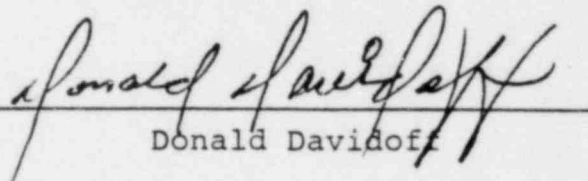
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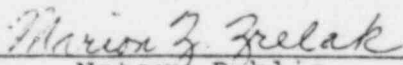
Docket Nos. 50-247-SP
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AFFIDAVIT OF
CORRECTNESS OF INTERROGATORIES

I, Donald Davidoff, being duly sworn hereby swear and affirm that the attached answers to the Interrogatories filed upon the State of New York by Union of Concerned Scientists - New York Public Interest Research Group are true and correct to the best of my knowledge and belief.


Donald Davidoff

Sworn to before me this
21st day of May 1982


Notary Public

MARION Z. ZRELAK
Notary Public, State of New York
Qualified in Albany County
Commission Expires March 30, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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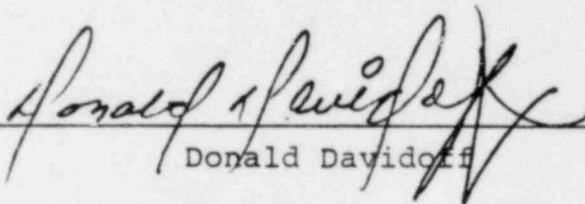
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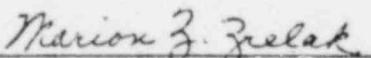
Docket Nos. 50-247-SP
50-286-SP

AFFIDAVIT OF
CORRECTNESS OF INTERROGATORIES

I, Donald Davidoff, being duly sworn, hereby swear and affirm that the attached additional answers to the Interrogatories filed upon the State of New York by Union of Concerned Scientists - New York Public Interest Research Group are true and correct to the best of my knowledge and belief.


Donald Davidoff

Sworn to before me this
25 day of May 1982


Notary Public

MARION Z. ZRELAK
Notary Public, State of New York
Qualified in Albany County
Commission Expires March 30, 1983

1. What is the position of NY State on the compliance of the Indian Point emergency plans with each of the sixteen mandatory standards set forth in 10 C.F.R. 50.47(b), and with the standards set forth in Appendix E to 10 C.F.R. Part 50? State all opinions and documents on which the position is based, and identify the person or persons who formulated the opinions and/or developed the documents.

It is our opinion that the New York State Radiological Emergency Preparedness Plan (State portion, Site Specific portion and the Putnam, Orange, Rockland, and Westchester County portions) is in substantial compliance with the sixteen planning standards for offsite emergency preparedness set forth in 10 C.F.R. 50.47(b), and Appendix E to 10 C.F.R. Part 50. Several specific items within some of the sixteen planning standards need further revision, as indicated by FEMA in its comments on the Indian Point portions of the State Plan dated December 31, 1981. We are advised that FEMA will be submitting its official critique of the Indian Point Exercise in the near future, and that some further comments about specific items may be forthcoming in that report. However, the items referred to in the FEMA comments of December 31, 1981 are easily corrected. We have engaged in the process of correcting these items in the course of our work with the four counties over the past few months. The opinion stated above is based on a review of the plan material against the Federal criteria by the Radiological Emergency Preparedness Group, which view was endorsed by the Disaster Preparedness Commission prior to a formal submission of the Plan by the Commission to FEMA.

2. Provide copies of any and all documents referred to in the answer to Interrogatory 1.

A copy of FEMA comments on the four county plans is attached.

3. What is the position of NY State on the assumptions about the response of the public and of utility employees utilized by or underlying the conclusions of the persons who developed the emergency plans and evacuation time estimates for Indian Point? State all opinions and documents on which the position is based, and identify the person or persons who formulated the opinions and/or developed the documents.

This question is not sufficiently clear for us to develop a response.

4. Provide copies of any and all documents referred to in the answer to Interrogatory 3.

See response to Item 3 above.

5. What is the position of NY State on the present estimates of evacuation times, based on NUREG 0654 and studies by CONSAD Research Corporation and by Parsons, Brinckerhoff, Quade & Douglas, Inc.? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents.

Our position on the evacuation time estimates employed in the development of the Indian Point Plan is that they are reasonable. The CONSAD study was commissioned by FEMA. It was not shared with us. The Parsons study was commissioned by the Power Authority of the State of New York and Consolidated Edison as part of the development of the first draft of local plan material. The Parsons study was reviewed by State staff from the New York State Department of Transportation which has expertise in the area of traffic and evacuation estimating. After thorough review, the Department of Transportation staff accepted the estimates and the basis for them developed by Parsons.

6. Provide copies of any and all documents referred to in the answer to Interrogatory 5.

Copies of correspondence between Parsons and the Department of Transportation are attached. These documents identify the persons who developed the estimates as requested in No. 5.

7. What is the position of NY State on the assumptions contained in the present estimates of evacuation times for Indian Point? State all opinions and documents on which the position is based and identify the persons or persons who formulated the opinions and/or developed the documents.

As stated in response to Question #5, the Department of Transportation reviewed the assumptions and concepts used in the development of the evacuation time estimates for the Indian Point area. Based on the review completed by the Department of Transportation staff and their recommendation to the Radiological Emergency Preparedness Group, it is our opinion that the assumptions are valid.

8. Provide copies of any and all documents referred to in the answer to Interrogatory 7.

See the material referred to in Item 6.

9. What is the position of NY State on the methodologies utilized by CONSAD Research Corporation and by Parsons, Brinckerhoff, Quade & Douglas, Inc. and in NUREG-0654 in preparing the present estimates of evacuation times for Indian Point? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents.

It is our position that the methodologies utilized by Parsons Brinckerhoff, Quade & Douglas, Inc. in the development of the evacuation time estimates for the Indian Point area are reasonable and are consistent with the current state of the art in the development of such estimates according to the NY DOT staff. The rationale set forth in the present planning criteria is also reasonable, and is consistently employed throughout the United States.

10. Provide copies of any and all documents referred to in the answer to Interrogatory 9.

11. What evaluations or review of the present time estimates for Indian Point have been done by NY State, and what person or persons participated in the review or evaluations? Were the raw data for the present time estimates obtained, evaluated and/or double-checked by NY State or for NY State? By what person or persons?

This question has been covered in full in responses #5, 7 and 9.

12. What evaluations or review of the present emergency plans for the State of New York have been done by NY State, and what person or persons participated in the review or evaluations? Were the raw data or computer models for the plans obtained, evaluated and/or double-checked by NY State or for NY State? By what person or persons?

The present Radiological Emergency Preparedness Plan (State portion, Indian Point Site Specific portion and the four county portions) was prepared by either consultants employed by the Indian Point utilities or staff of the Radiological Emergency Preparedness Group (REPG). In either case, all material was reviewed by senior staff in the REPG on a final edit basis before submission to the Disaster Preparedness Commission. After review by the Commission, this material was officially certified to FEMA by the Chairman of the Disaster Preparedness Commission pursuant to regulations and procedures requested by FEMA. Where appropriate, raw data was reviewed for accuracy by REPG staff. The only computer modeling employed in plan development to date was that used by Parsons in the development of a comparison of static time estimates with estimates developed through the so-called dynamic model concept. That material was reviewed by the Department of Transportation staff, as referred to in earlier answers.

13. What is the position of NY State on the reliability of Con Edison and/or PASNY to notify the proper authorities of an emergency promptly and accurately? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents. What information does NY State have or has NY State had about the performance of Con Edison and/or PASNY with regard to notifying authorities of an emergency at Indian Point?

Since May of 1980, REPG has been charged with the responsibility for primary contact from utilities in the case of an accident that requires reporting. The utilities also are required to make use of the dedicated hotline which connects both reactors with the four counties and the State of New York. There was some confusion and some lack of reporting prior to the enactment of the new specific emergency classification system contained in the sixteen planning criteria. The former reporting system left considerable room for judgement on behalf of nuclear power plant operators. The new classification system is much more explicit, and since its effective date, State experience with the reporting of incidents from both Consolidated Edison and PASNY has been acceptable. We continue to work with these utilities and the other nuclear facilities around the State to improve the notification system, both in terms of procedures and in the communications system itself. Each report of an unusual event or a higher classification from a company is recorded on the dedicated hotline, and REPG also makes a permanent record of the incident on a separately devised reporting document.

The report recently delivered by the Disaster Preparedness Commission to the Governor and the Legislature, which is already in the hands of the intervenors, recommends an increase in the amount of data which would automatically flow to the State. This is the so-called independent assessment concept, which would augment any

present reporting system. The call for an independent assessment system is partially motivated by concern, in general terms, about reliance upon any utility to report incidents. However, the record of these two companies over the past two years has shown a consistent improvement in the attempt to report necessary information to the State and the counties.

14. Provide copies of any and all documents referred to in the answer to Interrogatory 13.

A copy of the present reporting form is attached. A representative sample of reporting forms received from utilities will be supplied on request.

15. What is the position of NY State on the range of accident scenarios and meteorological conditions taken into account in the emergency plans and proposed protective actions for Indian Point? Specify the accident scenarios and meteorological conditions that are taken into account in the emergency plans and proposed protective actions for Indian Point. State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed the documents.

The offsite emergency plans of the four counties and the State in relation to the Indian Point site are not predicated on any range or type of accident scenario or meteorological conditions. Rather, we have developed these plans to respond to any accident that might occur, and to be prepared for a full range of activities within 10 miles of each site for inhalation purposes, and within 50 miles of each site for ingestion purposes.

16. Provide copies of any and all documents referred to in the answer to Interrogatory 15.

None.

17. Does the State have an independent set of standards for what constitutes an acceptable radiation dose resulting from an accident at Indian Point, or does the State adopt the federal standards? Describe and explain fully.

The State does not have an independent set of standards for "acceptable radiation dose." In fact, most authorities are unwilling to establish any levels of radiation dose as being "acceptable." The State has adopted the protective action guides developed by the Environmental Protection Agency as guidelines for making decisions on when to take protective actions. Adoption of the Federal protective action guides is set forth in the State Plan.

18. Are there any federal radiation standards which the State currently believes are insufficient to protect the public health and safety of the citizens of New York State? Explain.

No. However, in September 1975, the Environmental Protection Agency issued the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" (EPA-520/1-75-001). Certain PAG guidance is either to be developed or is in draft form. The chapters of this Manual dealing with PAGs for exposure from radioactive material deposited on property or equipment have not yet been developed. The proposed ingestion pathway PAGs by the Food and Drug Administration, Department of Health, Education and Welfare were published for comment in the December 5, 1978 Federal Register. New York State adopts both the EPA PAGs and the proposed FDA PAGs. The draft ingestion material and missing contamination PAGs should be finalized.

19. Provide copies of any and all documents referred to in the answer to Interrogatory 17 and 18.

A copy of the EPA Manual is supplied. The HEW regs are available in the cited volume of the Federal Register.

20. Interrogatory #20 is omitted.

21. What is the position of NY State on the appropriateness of the present plume exposure pathway EPZ for Indian Point? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed the documents.

Our position on the appropriateness of the present plume exposure pathway emergency planning zone for Indian Point is that the State has accepted the Federally recommended 10 mile zone as appropriate as a generic standard. We are not aware of any evidence that indicates that a wider zone is more appropriate for any particular New York State plant than the generic one recommended by the Federal government.

22. Provide copies of any and all documents referred to in the answer to Interrogatory 21.

None.

23. What is the position of NY State on the provision of potassium iodide to the residents of the EPZ of the Indian Point plants? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed the documents.

The position of the State of New York on the question of potassium iodide is set forth in detail in the previously referred to report to the Governor and the Legislature by the Disaster Preparedness Commission. The specific detailed response is extracted from the full report and set forth under Item 24 below. In addition, the Commissioner of Health will convene a nationwide symposium on the medical aspects of radiological emergencies in conjunction with the New York City Academy of Medicine. One of the items to be discussed in the symposium will be the present position referred to above.

24. Provide copies and any and all documents referred to in the answer to Interrogatory 23.

An excerpt from the Chapter 708 Report is attached.

25. What is the position of NY State on the sheltering capability in the EPZ of the Indian Point plants? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the documents.

Sheltering as a protective action refers to getting the population into a structure such as their homes to provide protection from a gaseous release. A sheltering directive would include recommendation for ventilation control such as closing doors and windows, turning off air conditioners, etc. Sheltering in this context does not necessarily refer to the civil defense/nuclear attacks shelter with blast and fallout protection. The county offices of civil defense/emergency services have information on fallout shelter spaces identified by the US Corps of Engineers shelter surveys. County plans can incorporate use of the public fallout shelters to supplement sheltering in houses, places of work, schools, etc.

26. Provide copies of any and all documents referred to in the answer to Interrogatory 25. N/A

The State of New York has not made a specific study of the sheltering capability of the EPZ. We have assumed that the EPZ contains enough dwellings or other buildings to provide adequate protection for the population.

27. What is the position of NY State on the effect of adverse weather conditions on the roadway network described in the emergency plans for Indian Point? What weather conditions result in what changes in the evacuation capabilities of the roadway network around Indian Point in the opinion of NY State. State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated and/or designed the documents.

Adverse weather conditions are one of the considerations which the Federal planning regulations require to be considered in the development of the evacuation component of a radiological emergency plan. The work performed by the Parsons firm as consultants, and as reviewed by the Department of Transportation staff, is consistent with the Federal requirements and does indeed take into consideration the specific weather conditions which the Federal regulations require.

28. Provide copies of any and all documents referred to in the answer to Interrogatory 27.

The Federal evacuation time conditions are attached.

29. What is the position of NY State on the establishment of conditions on the licenses of Con Edison and PASNY relevant to evacuation capabilities of the road network around Indian Point? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated and/or developed the documents.

It is the position of New York State that it is appropriate for the NRC to consider the capabilities of the road network in conditioning the granting of licenses.

30. Please provide copies of any and all documents referred to in the answer to Interrogatory 29.

None.

31. What is the position of NY State on the feasibility of and need for upgrading the roadway network at Indian Point to permit successful evacuation of all residents in the EPZ before the plume arrival time? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed documents.

It is the position of New York State that evacuation of the EPZ for Indian Point is feasible based on the capability of the road network. This opinion is based on documents referenced in Answers 5, 7, and 9.

32. Provide copies of any and all documents referred to in the answer to Interrogatory 31.

None.

33. What is the position of NY State on the feasibility of and need for upgrading of the emergency plans for the Indian Point plants to take into account the special needs of special groups and particularly those who are dependent on others for their mobility? What specific measures could and/or should be taken in this respect? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

The county and State portions of the Plan were developed with the needs of special populations very much in mind. However, it remains for certain procedures and certain special actions by the public to flesh out the most appropriate method of handling this special problem. The Plan calls for development of public information material. Such descriptive material has been developed and mailed to a wide range of residences and businesses within the emergency planning zone. The material discusses the problem of those with special needs, and invites the public to submit specific instances where special assistance is required. Those requests are referred to the appropriate county Department of Social Services where follow-up contacts are to be made. In many cases, such contacts have already been made, but we recognize that much more needs to be done in this important area. Despite public efforts, a major responsibility remains for families and friends of those with special problems. Vulnerability is not a simple matter of relationship to a possible accident at a nuclear power plant. Any emergency or disaster would effect this population in a similar fashion. It remains a residual responsibility for relatives or friends to work out special problems with appropriate public agencies, recognizing, however, that total burden cannot and should not be borne by government.

34. Provide copies of any and all documents referred to in the answer to Interrogatory 33.

Copies of the Indian Point brochures are attached.

35. What is the position of NY State on the feasibility of and need for specific steps to be taken by NRC, State and local officials to promote a public awareness that nuclear power plant accidents with substantial offsite risks are possible at Indian Point? What specific steps have been or are being contemplated or considered by NY State? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

We recognize that it is essential for all concerned parties to promote a public awareness as to the possibility of an accident at a nuclear power plant and that there might be substantial risk to the population within the vicinity of such plants. We also believe that it is feasible for specific steps to be taken to promote that public awareness. The Federal planning criteria specifically require such public information activity. There are two basic steps which the State is embarking upon. First, we will develop a series of informational documents for various segments of our society dealing with the existence of nuclear power plants and the potential offsite risks to the public. The Department of Health, which is a major participant in the radiological emergency planning program, has a long history of public education programs in the area of health matters. We will rely on the expertise which exists in DOH, and we will bring that into focus within the program responsibility of the Radiological Emergency Preparedness Group. Probably the most effective way of advising the public about this problem is by direct contact. Working with the counties, we have already participated in a series of meetings with a variety of organizations to discuss radiological emergency planning. The work plan for the remainder of fiscal year 1982-83 for the Radiological Emergency Preparedness Group, places heavy emphasis on public contacts.

36. Provide copies of any and all documents referred to in the answer to Interrogatory 35.

Attached is a copy of the REPG work plan and a list of specific appearances in one or more of the Indian Point counties.

37. What is the position of NY State on the feasibility of and need for the establishment of a maximum acceptable level of radiation exposure as an objective basis for measuring the adequacy of emergency planning at Indian Point? What levels of radiation exposure have been or are being considered by NY State as acceptable in the event of an accidental release of radiation? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

(See the answers to Item 17 and 18)

38. Provide copies of any and all documents referred to in the answer to Interrogatory 37.

(See the answers to Item 17 and 18)

39. What is the position of NY State on the feasibility of and need for the emergency planning brochure to give more attention to problems associated with persons who are deaf, blind, too young to understand the instructions, or who do not speak English? What specific additional improvements are necessary in the emergency planning brochure in the opinion of NY State in this regard? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

(See the answer to #33 and #35).

40. Provide copies of any and all documents referred to in the answer to Interrogatory 39.

(See Above)

Interrogatory
May 21, 1982

41. Provide copies of all reports, draft or final, resulting from the emergency planning exercise of March 3, 1982 at Indian Point.

The State's report on the Indian Point exercise is still in the process of preparation. A copy will be provided when the report is complete. Drafts of state documents are pre-decisional materials of the agency that are privileged.

42. What is the position of NY State on the performance of the employees and agents of NY State and the four counties during the emergency planning exercise of March 3, 1982? State all opinions and documents on which the position is based, and identify the person or persons who formulated the opinions and/or developed the documents.

Analysis of the performance of employees and agents of the State and the four counties during the March 3, 1982 Exercise will be contained in the After Action Report, discussed in Question #41 above.

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43. Is/the the State's independent position that the combined off-site emergency plans of the licensees, local and state officials are required to be in full compliance with the emergency planning measures set forth in 10 CFR 50, Appendix E, 10 CFR 50.47 and NUREG-0654, Rev. 1, as a condition of operation for the Indian Point plants?

a.) If yes, does the State believe that the licensees should not be allowed to operate their plants when any component of the emergency plans are not in full compliance?

b.) If no, which planning measures set forth in 10 CFR 50, Appendix E and 10 CFR 50.47, and including each of the criteria set forth in NUREG-0654, Rev. 1, need not be met as a condition of operation, in the opinion of the State?

It is the State's position that substantial compliance with each of the criteria set forth in 10 C.F.R. 50.47 and NUREG-0654 should be required as a condition of operation.

44. Are there any additional emergency planning requirements the state believes should be imposed upon the Indian Point licensees as a condition of operation? Please list and describe fully.

No.

45. please indicate upon what independent NY State studies, documents, standards, and criteria the responses to Interrogatories 43 and 44 are based, or whether NY State is relying upon the NRC and/or FEMA positions.

NY State is relying upon the NRC and/or FEMA positions.

46. Provide copies of any and all documents referred to in the responses to Interrogatory 45.

None.

47. What contacts did NY State have with the utilities and their consultants, EDS Nuclear and Parsons, Brinckerhoff, Quade and Douglas, Inc., who wrote the county portions of the NYSRERP? Please describe these fully, including dates, participants, and content, and provide copies of any and all documents arising out of and about these contacts.

The Parsons firm had been at work on various aspects of evacuation prior to the creation of the Radiological Emergency Preparedness Group in May of 1980. The EDS firm was retained by the utilities to prepare the remainder of the 4 county emergency plan about the time that REPG came into existence. REPG has worked with EDS Nuclear from the first moment they were brought on the scene to assist the counties in the development of plan material. It was decided that State staff would concentrate on development of the State portion of the Plan and the Site Specific portions thereof, while EDS and Parsons would concentrate on development of the first draft of the four county plans.

The relationship between State staff and the two consultants was continuous and fruitful from mid-1980 until August 1981 when all Plan material was collected and submitted for formal review by FEMA. Thereafter, the consultants have assisted in a variety of ways pertaining to the exercise and to revisions in Plan material, as well as in certain training matters.

It is extremely burdensome to provide a complete list of all the correspondence, meetings and other documents that arose out of this ongoing task which covered more than 1 year. Perhaps further discussion with UCS-NYPIRG could narrow the specific area of interest and documents could be provided.

48. What evaluations or reviews of the County portion of the NYSRERP for around Indian Point have been done by NY State, and what person or persons participated in these reviews or evaluations? Were the raw data or computer models for the plans obtained, evaluated and independently verified by NY State? If so, by which person or persons? Please provide all documents used in answering this question.

All drafts of county material were reviewed by members of the REPG staff. As stated in the answer to previous questions, the evacuation components were also reviewed by staff from the Department of Transportation. Raw data was checked, where deemed necessary, and the computer model for dynamic evacuation analysis was reviewed, as previously mentioned, by DOT staff. No documents were used to answer the question, and hence none were provided.

49. What State Agencies, Groups, Departments, and/or Commissions were or are involved in developing, coordinating, and maintaining the NYSRERP?

The Radiological Emergency Preparedness Group is primarily responsible for developing, coordinating and maintaining the entire New York State Radiological Emergency Preparedness Plan.

The REPG is a staff group for the Disaster Preparedness Commission. REPG also has primary contacts with the Department of Health and the Division of Military and Naval Affairs. In addition, we are authorized to deal with a variety of State and other agencies in the pursuit of our responsibilities. We are expected to and do indeed work closely with the affected counties in revising and reviewing the county portions of the plan.

50. Provide all revisions, appendices, and attachments to the NYSRERP from August, 1981 to date.

The August 1981 Plan material referred to in this question is the latest revision. There is work in progress as far as the four counties are concerned and as far as the State Plan is concerned, but there are no specific revisions in print at this time.

51. Continue to provide any further revisions, appendices and attachments to NYSRERP to UCS/NYPIRG throughout current proceeding and until further notice.

As revisions become available, we will be pleased to supply them to all parties.

52. Provide all contracts and agreements which New York State has entered into with Con Edison, PASNY, Con Edison's and PASNY's consultants, and independent consultants, relating to development, preparation, maintenance, and revision of the NYSRERP.

The only contract which New York State entered into with any party concerning development, preparation, maintenance and revision of the Radiological Emergency Preparedness Plan is that which covered the original work provided by the Radiological Emergency Preparedness Group from May 1, 1980 until September 30, 1981, at which time the contract expired and our work continued under the provisions of Chapter 708 of the Laws of 1981. The contract and its several amendments are appended.

53. Identify State equipment and personnel available for the following tasks:

- a. Verification of radiological releases.
- b. Monitoring of radiation plume.
- c. Radiation dose assessment.
- d. Communications between State Emergency Operations Center (EOC), and State or other personnel in the field carrying out tasks a-c.
- e. Communications between New York State, the Counties involved and Con Edison and/or PASNY Emergency Operation Facilities.

- a. At present, the State initially, and throughout an incident, relies on the licensees' monitoring teams for monitoring and verification of the radiological releases. In addition, each county has at least two monitoring teams for monitoring and verification that mobilize to provide independent verification. The State plan also calls for obtaining radiological assistance through the Federal plan coordinated by the U.S. Department of Energy. If needed, up to four State radiological health specialists are available for verification of radiological releases.
- b. See answer to a.
- c. Radiological assessment and evaluation is the responsibility of the radiological health staff of the State Department of Health. The Health Department's staff is supplemented by technical staff from the Office of Disaster Preparedness, State Energy Office, Department of Environmental Conservation, and Agriculture and Markets.
- d. The licensees and county monitoring teams will use their own radio systems for relaying field data to their respective EOF/EOC. The monitoring data will be collated and transmitted to the State EOC via communications listed in e. below. If State monitors are dispatched, mobile radios on the Office of Disaster Preparedness district command and control radio net can be used.

e. Communications between New York State, the four involved counties and Indian Point include:

- (1) commercial telephone.
- (2) NAWAS - National Warning System.
- (3) RECS - Radiological Emergency Communications System hotline.
- (4) ODP command and central radio net - base station installed at Indian Point awaiting FCC license.

54. Identify location and condition of all equipment mentioned in Question 53.

The State Health Department's portable emergency survey equipment is listed on pages 10 and 11 of Part III, Section II of the State Radiological Emergency Preparedness Plan. The Department maintains its own calibration facility and has a full-time electronics technician for repair and calibration of survey instruments used for both regulatory and emergency responsibilities.

55. What is the State's estimated deployment time for the State's emergency personnel? Please be specific as to areas of responsibility and geographic location, i.e., how long until monitoring teams reach predesignated sites near or far from the plant, how long will it take for full EOC mobilization in Albany or Poughkeepsie, and so forth?

The State employs a phased notification and activation of agencies and staff depending on the severity of the incident.

For a Notification of Unusual Event, key staff in selected agencies are notified. No activation occurs.

At the Alert classification, the State EOC becomes operational and is partially activated by technical staff. The remaining State agencies are notified and placed on standby. The District EOCs, such as that at Poughkeepsie, are fully activated at the Alert.

The State EOC is fully activated for the Site Area Emergency and General Emergency classifications. State representatives are dispatched to the licensee's EOF and to appropriate County EOCs.

During a business day, the State EOC becomes operational within minutes and can be fully activated in 30-45 minutes. During evenings and non-business hours, the State EOC can be operational in 10-30 minutes and be fully activated in 1 to 1½ hours.

It is estimated that a district EOC will be fully activated in 2 to 5 hours.

State personnel assigned to an EOF or County EOF could be at their assignment in ½ to 6 hours.

56. What procedures are in place to notify needed state personnel of a radiological emergency at Indian Point?

Procedures for notification of key State agency liaison personnel and for activating the State and District EOCs are found in the New York State Radiological Emergency Preparedness Plan, Part III, Section I, Procedures B and D. Individual State agencies have their own internal notification and call-up procedures. In general, those procedures involve calling selected key personnel.

57. Describe in detail any changes in these procedures that would follow a declaration of a State of Emergency at Indian Point.

The procedures described in Questions 53-56 would not change at all if there were a declaration of a State of Emergency at Indian Point. The Plan and its procedures anticipate such an event.

58. Provide all New York State responses to the April, 1981 December, 1981 FEMA Radiological Assistance Committee's Reviews. In response to this interrogatory provide the following:
- a. All revisions to specific portions of NYSRERP which the RAC criticizes.
 - b. All documents arising out of any response to or comments upon the RAC Review.

As a result of the Regional Assistance Committee's April, 1981 review of the draft plan, a completely revised New York State Plan was formally submitted for federal review. On July 15, 1981 the generic part of the State Plan, plus site specific material for Nine Mile Point/James A. FitzPatrick including Oswego County was forwarded to FEMA. On August 19, 1981, the site specific Indian Point material plus the four county plans was submitted.

The process of incorporating the December 1981 comments is presently continuing, and will also include the federal comments on the Indian Point exercise when available.

59. What memoranda of understanding or any other type of letter of agreements exist which explains and outlines each NY State Department or agency's role, including responsibilities and personnel involvement, in any radiological emergency? Please attach copies of all such documents. If these memos are not finalized, please outline what problems remain to be resolved.

There are no memoranda of understanding or any other type of letters which explain State agencies' roles. Rather, Article 2-B of the State's Executive Law sets forth certain relationships between and among those agencies under the general auspices of the Disaster Preparedness Commission, and the New York State Disaster Preparedness Plan also sets forth those relationships. More specifically, however, the State portion of the Radiological Emergency Preparedness Plan sets forth the responsibilities and relationships of all appropriate State agencies. That material has been previously provided to the parties.

60. According to the December 31, 1981 FEMA RAC Review of element J.10.1., the RAC noted the NYSRERP's missing Appendix 4, prepared by the licensee's consultant, Parsons, Brinckerhoff, Quade, and Douglass. Assuming that the State has received the consultants work, please forward a copy of the consultant's report, and include any other documents that the State has received from the utilities' consultants.

A copy of the report should be provided by the consultants.

61. Provide time estimates for the implementation of all recommendations included in the State 708 Report. Identify the source of such estimates by author, publication and date.

Performance of the recommendations of the Disaster Preparedness Commission to the Governor and the Legislature as set forth in the recently delivered and previously referred to Report, requires funding from the utilities or another source in order to permit implementation. Assuming funding, aside from the independent assessment and verification aspects of the recommendations, it is our estimate that all recommendations could be implemented in substantial fashion by the end of fiscal 1983-84. This estimate is based on our REPG work over the last 2½ years.

62. Delineate each interim measure the State is taking in order to improve its level of preparedness until all of the recommendations from the State 708 Report are implemented.

"Interim measures" as used in this question is actually another way of describing the basic responsibilities of the Radiological Emergency Preparedness Group now that the Plan has received preliminary acceptance by FEMA and now that an Exercise of the Indian Point portion has been completed. It is our responsibility to revise the Plan where needed, to move forward with funding for the counties for necessary equipment and staff, to work with the counties on extensive training for appropriate workers, to work with the public to explain the Plan, to achieve and improve communications where necessary and to work with the utilities to improve our communications and technical capabilities.

63. Provide any available time estimates for the implementation of these interim measures. Identify the source of such estimates by author, publication and date.

The "interim measures" are being handled in accordance with the REPG work plan attached herewith.

64. Provide copies of all legislation or drafts of legislation being proposed to facilitate implementation of all recommendations in the State 708 Report.

At this time, the only legislation proposed to implement the Chapter 708 Report is Assembly 11901, a copy of which is attached hereto. This proposed legislation would implement in substantial form all recommendations contained in the Report.

65. List and describe all recommendations of the State delineated in the 708 Report. Number items in this list according to their relative importance for protecting the public health and safety. Start with the most important recommendation and end with the least important.

The recommendations of the Chapter 708 Report, a copy of which is in the hands of all parties, contains a specific list of all recommendations. The Legislature called upon the Disaster Preparedness Commission to make certain recommendations and to cost out the implications of each recommendation. This has been done in the Report. We do not believe that any of the recommendations are more or less important than others.

66. Which items listed above do the State believe are required in order for the utilities to comply with the NRC Emergency Planning Regulations and Guidelines.

As pointed out in the Report, the one area where there is really no compliance with the federal requirements is as to the question of field monitoring by State staff. Additional equipment and other funding is requested to meet this shortfall.

67. Which items listed above does the State believe are necessary to protect the public health and safety.

Aside from the field monitoring technical issue discussed in #66 above, we believe that all the recommendations contained in the Report will improve protection of the public health and safety. We believe that the 16 basic Federal requirements are addressed in the State Plan.

Interrogatory
May 21, 1982

68. Provide all drafts and documents upon which preparation of the final 708 Report was based.

Drafts of State documents are not subject to discovery since they are pre-decisional materials of any agency that are privileged under Federal and State Law. The documents upon which the 708 report is based are referenced in that document.

69. Is the State's position that a site-specific consequence study is necessary in order to better predict and plan for emergency planning needs for the Indian Point site?

It is our understanding that a consequence study was required of the utilities by the NRC and that one was provided. A site-specific consequence study could be helpful in emergency planning if it pinpoints weaknesses in the plant.

70. Has the State prepared or is it planning to prepare such a study referred to in the above question. Provide a copy of this study, if complete, or state an estimated timetable for accomplishing such a study.

The State is not planning to prepare a consequence study.

71. Identify all people upon whom the State of New York or its agents relied in the preparation of the 708 Report. The identification should include the following:

- a. What is the person's full name?
- b. What is the person's address?
- c. What is the person's last known position and business affiliation?
- d. What is the person's field of expertise?
- e. If the person is not a state employee, on what date did NY State first contact or consult the person?
- f. What are the dates of all subsequent contacts or consultations with the person?
- g. Were any reports made to NY State by the person?
- h. If the answer to question 71g is anything other than a simple negative, indicate for each such report:
 - (1) the date of the report;
 - (2) whether the report was written or oral; and
 - (3) whether the report was submitted by the person while acting in an advisory capacity, as a prospective witness, or both.
- i. What is the subject matter of the witness' testimony?
- j. What are the facts and/or opinions to which the witness will testify and the grounds for each fact or opinion?

The authors of the Chapter 708 Report, their addresses, positions and expertise are as follows:

William Stasiuk, P.E., Ph.D., Empire State Plaza, Room 404, Albany, NY, 12237, Director, Field Operations Management Group; Environmental Health

Donald B. Davidoff, J.D., Empire State Plaza, Room 1750, Albany, NY, 12237, Director, Radiological Emergency Preparedness Group; Emergency Preparedness and Public Health

Karim Rimawi, Ph.D., Empire State Plaza, Room 1750, Albany, NY, 12237, Director, Bureau of Environmental Radiation Protection; Radiological Health and Dose Assessment

Lawrence B. Czech, Empire State Plaza, Room 1750, Albany, NY, 12237, Chief, Nuclear Planning, REPG; Radiological Health and Emergency Planning.

Item 71 e, f, g & h request information about persons who are not State employees. All non-State employee persons relied upon in the preparation of the Chapter 708 Report are identified in that Report.
(See Volume II)

The Chapter 708 Report is not testimony; hence, 71 i and 71 j are not answerable.

72. Is the State considering adopting extended Emergency Planning Zones in order to protect the population residing beyond the 10 miles from Indian Point?

This question was responded to in relation to Question #21 above.

73. Is it the position of the State that ad hoc emergency procedures would be adequate to protect the health and safety of populations beyond 10 miles of Indian Point?

Ad hoc emergency procedures are not adequate to protect the health and safety of populations beyond 10 miles from Indian Point, but within 50 miles of the plant. We are required by Federal regulations and by good planning concepts to develop more than an ad hoc procedure for the entire ingestion pathway.

74. Is it the position of the State that ad hoc emergency procedures would be adequate to protect the health and safety of the population of New York City should an accident occur at Indian Point?

This question is covered by the answer to #73 above.

75. Please indicate whether the State is relying upon NRC and FEMA's positions on this matter or has the State undertaken any independent study to determine whether ad hoc procedures would be adequate to protect the health and safety of the population of New York City. Please supply copies of such studies.

As indicated in Question #73 above, we are accepting federal guidelines under which ad hoc procedures are not acceptable up to the 50 mile EPZ, and we have developed appropriate procedures for the zone covering the area up to 50 miles from the plant. More work is needed on this subject. The next exercise of the State Plan (James A. Fitzpatrick - August 11, 1982) will cover ingestion pathway matters indepth.

76. Has the State undertaken or does it plan to undertake any systematic study of the New York City's residents in order to determine their likely range of responses in the event of an accident at Indian Point? Provide copies of such a study or planning study.

No.

77. Provide copies of all documents, studies, data, etc. provided by the State to consultants of the licensees for use in the preparation of the emergency plans for Indian Point, including but not limited to data and information pertaining to the road capacity, traffic flows, accident patterns and statistics within and beyond the 10 mile Emergency Planning Zone.

We provided nothing to the consultants.

Interrogatory
May 21, 1982

78. Provide all notes, reports, documents relating to preparation for and assessments of drills preceding the Indian Point joint exercise of March 3, 1982.

The State has no material relating to the drills preceding the Indian Point exercise.

Interrogatory
May 21, 1982

79. Provide all drafts, letters, documents, etc. used in the State's role in the preparation of the scenario, both on and off-site, for the joint exercise of March 3, 1982.

A copy of the off-site scenario is attached. No other materials exist as regards preparation of the exercise.

80. What is the State's position and what has it been on the necessity of sounding the sirens during the exercise of March 3, 1982? What is the State's position on adequacy of post-exercise siren testing?

It is our position that the sounding of sirens during the March 3, 1982 exercise was a reasonable method of testing this important aspect of the public notification system. FEMA strongly encouraged the State and the counties to test the siren capability during the course of the exercise. We concurred in their judgement since the use of the siren and other notification components is closely related to other aspects of preparedness. Post exercise siren testing is an imperative. Some testing of that sort has occurred since the March 3 exercise, but much more is needed. It is apparent that considerable work on the siren system is needed. This has been recognized by FEMA in its preliminary comments on the exercise, and we intend to cooperate fully with FEMA, the counties and the utilities in this important matter.

81. What is the State's position on the adequacy of the State Emergency Broadcast System's performance during the March 3, 1982 joint exercise?

The Emergency Broadcast System performed very well during the March 3, 1982 exercise.

82. Provide notes, reports, documents, etc. presented in all meetings participated in by the State and its consultants in preparation for and subsequent to the Indian Point exercise of March 3, 1982.

A copy of the scenario for the off-site portion of the exercise is attached. A report is in preparation and will be provided. Notes and other materials relating to that report are not subject to discovery since they are pre-decisional materials that are privileged under Federal and State Law.

Interrogatory
May 21, 1982

83. What was the total cost to State taxpayers of State officials and their consultants' participation in all activities relating to the Indian Pont exercise on March 3, 1982?

The requested information is not relevant to the contentions in this proceeding nor is it reasonably calculated to lead to the discovery of information relevant to the contentions.

84. What is the State's position on improvements needed for future exercises at the Indian Point site?

The After Action Report described in answer to Question #41, will address this question.

85. Identify all State personnel and State consultants who participated in or observed the Indian Point exercises of March 3, 1982. Include their credentials and training.

The following State personnel participated as controllers during the Indian Point exercise at the locations indicated below. Several hundred State employees participated in this exercise at the various locations including the State EOC, District EOC, County EOC's, licensee EOF, emergency news center, medical drill, agency command posts and in field activities. There is no complete list of these participants. The sign-in sheet at the State EOC operations room may have been saved. We will endeavor to obtain a copy of this roster.

<u>Name and Assignment</u>	<u>Title</u>	<u>Quals</u>	<u>Experience</u>
Lawrence Czech State EOC-Exercise Director	Chief of Nuclear Protection Plann- ing	MS-Physics	20 years in positions involving radiologica health or emergency preparedness
James Papile Westchester County EOC - Controller	Chief, Emerg- ency Planner	M.S.- Management	35 years active mil- itary duty - Indust- rial College of Armed Forces - emergency planning
Marvin Silverman Rockland County EOC- Controller	Planning Communications Officer	AAS - Construction Technology	1½ years in radio- logical planning
J.R. Dillenback Orange County EOC- Controller	Sr. Emergency Planner	B.A.-MBA Candidate	3½ years in general emergency and radio logical planning
E.H.L. Smith Putnam County EOC - Controller	Assistant Director Disaster Pre- paredness Pro- gram (retired)	-	20 years in general and radiological planning
Frank Griffin Southern District EOC and Dutchess County EOC - Controller	Supervising ND/ CD Radiological Representative	AAS - Electrical Technology	19 years in civil defense and disaster preparedness
James Baranski Indian Point EOF - Controller	Principal Nuclear Specialist	A.A.S. and B.S. in Business Administra- tion, Sr. Reactor License #2102	8 years - Naval Re- actor experience - 8 years - Commercial Reactor experience 4 years Nuclear Safety experience- State of New York

85. (cont.)

Charles Gimbrone
Offsite Medical Drill-
Controller

Training Officer B.A.

20 years experience
in public health and
environmental training

The State's evaluators for the exercise are listed in the State of New York's filing pursuant to the March 10 and April 8 orders. Three persons are listed as N.Y. State Evaluators on that list. The qualifications of Edward (E.H.L.) Smith and Charles Gimbrone are listed above. Margaret Helmkie is from Oswego County. The remainder of the evaluators on that list are employees of consulting firms and their credentials and training were never made available to the State of New York and are not readily available to the State of New York.

86. What is the State's position on the intervenors' representatives who observed the Indian Point exercise of March 3, 1982, according to the terms of the Atomic Safety and Licensing Board. Include in your response details regarding specific effects on the drill, if any, you attribute to the intervenor observers.

The State has no position, other than that stated to the Licensing Board on this procedural question.

87. What modeled information was used by State participants in the exercise as a basis for protective action decisions for the public including "recovery and re-entry" phases both within and outside the 10 mile zone?

We do not understand this question.

88. What is the State's position on adequacy of public information brochures at the time of the drill? If found inadequate, what is the State's position on improving their content?

The public information brochures were prepared by the Power Authority of the State of New York with input from the counties and from the State. However, the basic responsibility for these documents was the Power Authority's. We found the brochures to be adequate in terms of the Federal requirements. Discussion with the Power Authority and the counties makes it clear that additional work is required to improve and expand upon these first time brochures.

We recognize that the State bears a basic responsibility in this area and we intend to fulfill that responsibility.

89. What was the timetable for alerting and mobilizing State officials and staff in the exercise?

The timetable for alerting and mobilizing State officials and staff during the Indian Point Unit 3 exercise is shown in Part II, Section A, Scenario Activity Sequence Matrix in the offsite scenario attached to the answer to Question 79.

90. What is the State's position on the adequacy of public and media relations as demonstrated in the exercise and if inadequate, what timetable does it propose to educate the press and public?

It is our position that relations with the media as they develop during the course of our plan work and exercises, especially the Indian Point exercise, has been more than satisfactory. The State Public Information Officer and the counterparts in each of the four counties have worked diligently with the media to explain this program and to answer their questions before and during the exercise. We propose no major changes in the public information program as far as it relates to the media.

However, considerable further work needs to be done with the public. This matter was discussed previously in relation to Question # 88 . Our work plan calls for a major piece of staff time for this area during the remainder of fiscal year 1982-83, and beyond.

91 Has the State developed or does it intend to develop any plans for the decontamination of land and property beyond 10 miles in the event that contamination levels following an accident at Indian Point require such measures? Please provide copies of any such plans or procedures, or a timetable for developing such plans and procedures.

There are no specific decontamination plans for land and property beyond 10 miles. Any radioactive release will require assessment and evaluation. If the levels of contamination are found to be above acceptable limits appropriate actions on a case by case basis such as soil interdiction or possible decontamination will be instituted.

92. Has the State developed or does it plan to develop any specific procedures for providing information and instructions to populations beyond 10 miles for use during a radiological emergency at Indian Point? Describe fully and provide all relevant documents.

The State Plan already provides for information to members of the public beyond the 10 mile emergency planning zone, although we recognize that at present we emphasis information to residents within the 10 mile zone. We intend to enlarge upon and expand this notification process as part of our ongoing plan revision work with the counties over the next months.

93. Has the State developed or does the State plan to develop a public education program for populations beyond 10 miles? Describe fully and provide all relevant documents.

The state does plan to develop a public education program for the population within and beyond the 10 mile emergency planning zone as indicated in answers 88-92 above.

94. Does the State intend to develop emergency procedures for radiation monitoring, public education information, and measures to protect the public beyond 50 miles of Indian Point? Describe fully and provide all relevant documents.

We have no plans at this time to develop measures beyond 50 miles of the Indian Point plant.

95. Please provide full information on the professional qualifications, and relevant training of all individuals with lead responsibilities for developing, maintaining, and carrying out the NYSRERP.

As stated in #49 above, REPG is the primary unit for developing, maintaining, and carrying out the New York State Radiological Emergency Preparedness Plan. Senior staff of REPG and their qualifications are set forth below:

<u>Name</u>	<u>Title</u>	<u>Quals</u>	<u>Experience</u>
Donald B. Davidoff	Director	J.D.	2½ years in this program-- 15 years in various public health programs
Karim Rimawi	On Loan from DOH	Ph.D. - Physics	8 years in radiological health special emphasis on dose assessment.
Lawrence B. Czech	Chief, Nuclear Protection	M.S.-Physics	20 years in positions involving radiological health or emergency preparedness
James D. Papile	Chief, Emergency Planner	M.S.-Management	35 years active military duty- Industrial College of Armed Forces - emergency planning
J.R. Dillenback	Sr. Emergency Planner	B.A.-MBA Candidate	3½ years in general emergency and radiological planning
James Baranski	Principal Nuclear Specialist	A.A.S. and B.S. in Business Administration, Senior Reactor License #2102	8 years - Naval Reactor experience- 8 years - Commercial Reactor experience- 4 years Nuclear Safety experience- State of New York

96. With respect to the responses provided by NY State to any of the interrogatories contained in this document, who are the persons upon whose opinions and/or knowledge of facts NY State expects to rely during the Indian Point evidentiary hearings?

At this time, the primary person to be relied upon for these responses during the evidentiary hearings will be Donald Davidoff, Director of the Radiological Emergency Preparedness Group.

97. Identify all individual(s), that you intend to present as witnesses in this proceeding on the subject matter of any of the order's questions. The identification should include the following:

- a. What is the person's full name?
- b. What is the person's address?
- c. What is the person's present or last known position and business affiliation?
- d. What is the person's field of expertise?
- e. If the person is not a state employee, on what date did NY State first contact or consult the person?
- f. What are the dates of all subsequent contacts or consultations with the person?
- g. Where any reports made to NY State by the person?
- h. If the answer to question 97g is anything other than a simple negative, indicate for each such report:
 - (1) the date of the report;
 - (2) whether the report was written or oral; and
 - (3) whether the report was submitted by the person while acting in an advisory capacity, as a prospective witness, or both.
- i. What is the subject matter of the witness' testimony?
- j. What are the facts and/or opinions to which the witness will testify and the grounds for each fact or opinion?

<u>NAME</u>	<u>ADDRESS</u>	<u>TITLE</u>	<u>EXPERTISE</u>	<u>SCOPE OF TESTIMONY</u>
Donald B. Davidoff	ESP Tower Bldg, Rm. 1750, Albany	Director	Emer. Planning- Public Health	State Plan- Site Specific
Lawrence B. Czech	ESP Tower Bldg, Rm. 1750, Albany	Chief, Nuclear Protection	Emer. Planning- Radiological Health	Local Plans & Radiological health aspects

97(e) through (h) are not applicable.

The facts and/or opinions to which the witnesses will testify and the grounds for each fact and/or opinion are found in the answers to these Interrogatories.

These persons are the ones the State presently intends to call as witnesses on Questions 3 & 4. Other persons may be called and we will inform UCS/NYPIRG when they are selected. In addition, the State may have testimony on Question #6 and UCS/NYPIRG will be informed when and if those witnesses are chosen.

Interrogatory
May 21, 1982

98. Provide a reasonable description of all documents that will be relied upon the testimony presented by each witness.

Since the State of New York has not prepared its testimony, this question cannot be answered.

Interrogatory
May 21, 1982

99. Identify by author, title, date of publication and publisher, all books, documents, and papers you intend at this time to employ or rely upon in conducting your cross-examination of prospective NYRIRG/UCS witnesses testifying in connection with NYPIRG/UCS contentions.

No need has been shown for discovery of the requested material under 2.740(b). In any case it would not be available at this time.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKET
FILED
JUN -1 1982
F12-39

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

CERTIFICATE OF SERVICE

I hereby certify that I mailed the attached copy of the Answers and Objections To Interrogatories and Document Requests Propounded by UCS/NYPIRG to the State of New York to all parties in this proceeding on May 27, 1982.

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