

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
CONSOLIDATED EDISON COMPANY OF NEW)	
YORK, INC. (Indian Point, Unit No. 2))	Docket Nos. 50-247 SP
)	50-286 SP
POWER AUTHORITY OF THE STATE OF NEW)	
YORK (Indian Point, Unit No. 3))	May 26, 1982

NRC STAFF INTERROGATORIES TO, AND REQUEST FOR
DOCUMENTS FROM GNYCE REGARDING QUESTION 6 CONTENTIONS

INTRODUCTION

The NRC Staff hereby requests that the Greater New York Council on Energy (GNYCE) pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying all documentary material identified in responses to the interrogatories below.

INSTRUCTIONS AND DEFINITIONS

1. Information sought in these Interrogatories shall include information within the knowledge, possession, control or access of any agents, employees and independent contractors of GNYCE.
2. Answer each Interrogatory separately (by part) in writing under oath or affirmation of the individuals who contributed thereto. Documents produced shall indicate in response to which specific request the documents are being produced, i.e., 1(a). For all references requested in

these interrogatories, identify them by author, title, date of publication and publisher if the reference is published; and if it is not published, identify the document by the author, title, the date it was written, the qualification of the author relevant to this proceeding, and where a copy of the document may be obtained.

3. In your answer, repeat each Interrogatory set forth herein and then set forth an answer thereto separately and fully. As to any Interrogatory, section or subsection of said Interrogatory that you refuse to answer for any reason, separately state the grounds for any such refusal. Where a complete answer to a particular Interrogatory, section or subsection of said Interrogatory is not possible, such Interrogatory, section or subsection of said Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

4. Identify any documents used as the basis for the answer to the Interrogatory.

5. If any Interrogatory or part thereof is objected to, state separately (by part) the objection and basis therefor.

6. If privilege is claimed as to any document, identify what is being withheld, the date of the document, the sender(s), the recipient(s) of all copies, the privilege claimed, the basis for the assertion of privilege, and the present location of the document.

7. If any document requested is unavailable, explain the circumstances of such unavailability.

8. In accordance with 10 C.F.R. § 2.740(e) these Interrogatories and requests for documents require prompt supplemental answers should

GNYCE obtain or identify supplemental information or documents which call into question the correctness of earlier answers.

9. In the event any word, term, or phrase is unclear to GNYCE it is requested that oral clarification be requested of the undersigned Staff counsel. Any word, term, or phrase is to have its generally accepted meaning.

10. "Documents" means all writings and records of every type in the possession, control or custody of GYNCE, its directors, officers, attorneys, employees or agents, including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, logs, transcripts, microfilm, accounting statements, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise.

"Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of the GNYCE.

INTERROGATORIES

Interrogatory 1

Identify all documentary or other material that you intend to use during this proceeding to support Contention 6.3 and that you may offer as exhibits on these contentions or refer to during your cross-examination of witnesses presented by Consolidated Edison Company of New York, Inc., Power Authority of The State of New York, or the NRC Staff.

Interrogatory 2

a) Upon what person or persons do you rely to substantiate in whole or in part your case on Contention 6.3?

b) Provide the address and education and professional qualifications of any persons named in your response to 2a. above.

c) Identify which of the above persons or any other persons you may call as witnesses on Contention 6.3.

Interrogatory 3

On page 3 of your April 9, 1982 filing entitled "Augmentation By the GNYCE of the Basis for its First Contention" you identify potential conservation savings of 5.7 billion kWh.

- a. What portion of these savings do you estimate (1) have been achieved to date, and (2) are accounted for in Con Ed's latest official forecast.
- b. For that portion of your estimated conservation savings above and beyond that identified in you response to Interrogatory 3a. provide
 - (1) all underlying assumptions leading to your estimate;
 - (2) the time frame over which you expect these savings to be realized;
 - (3) estimate of savings by consuming sector and by end use;
 - (4) estimate of the economic cost of the conservation effort being projected; and
 - (5) the extent to which government subsidies (e.g., low cost loans and tax incentives) and government mandatory programs are expected to contribute to these conservation savings.

Interrogatory 4

On page 3 of your April 9, 1982 filing, you indicate conservation would save over \$550 million. Provide all underlying assumptions for this estimate and explain its basis. Also, over what time period will these savings occur.

Interrogatory 5

In your April 9, 1982 finding you state that conservation will displace 71% of Indian Point generation value. Are you suggesting that these projected conservation savings will displace Indian Point generation? If yes, explain why it would not displace Con Ed's and PASNY's reliance on its marginal cost source of generation, i.e., oil.

Interrogatory 6

Provide your basis and assumptions used in concluding in your April 9, 1982 filing, that 1500 MW of gas fired cogeneration capacity could be built within 5 years.

Interrogatory 7

Identify environmental impacts and estimate the economic cost associated with this cogeneration effort (1500 MW of gas fired cogeneration capacity).

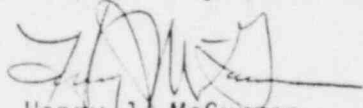
Interrogatory 8

Provide your basis for concluding in your April 9, 1982 filing that savings of \$600 million per year in fuel costs can be realized. Doesn't this assume cogeneration will phase out Con Ed's and PASNY's reliance on oil, and if so, how can this alter the replacement energy cost estimates for Indian Point?

DOCUMENT REQUESTS

1. Provide for inspection and copying by the NRC Staff all documents identified in GNYCE's answers to Interrogatories 1 through 8 above.

Respectfully submitted,


Henry J. McGurran
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 26th day of May, 1982.