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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

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In the Matter of :  
:  
CONSOLIDATED EDISON COMPANY OF :  
NEW YORK, INC. (Indian Point, :  
Unit No. 2) :  
:  
POWER AUTHORITY OF THE STATE OF :  
NEW YORK, (Indian Point, :  
Unit No. 3) :  
:  
-----X

Docket Nos. 50-247 SP  
50-286 SP

June 14, 1982

CONSOLIDATED EDISON'S CROSS EXAMINATION PLANS  
FOR PROPOSED WITNESSES OF COUNTY OF ROCKLAND, NRC  
STAFF, FEMA, AND STATE OF NEW YORK REGARDING ISSUES  
RELATED TO COMMISSION QUESTIONS 3 and 4

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CONSOLIDATED EDISON'S CROSS EXAMINATION PLANS  
FOR PROPOSED WITNESSES OF COUNTY OF ROCKLAND, NRC  
STAFF, FEMA, AND STATE OF NEW YORK REGARDING ISSUES  
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INTRODUCTION

Pursuant to this Board's April 23, 1982 Order (p.22) Consolidated Edison (Con Edison), Licensee of Indian Point, Unit No. 2, hereby submits its cross examination plans for the captioned witnesses in this proceeding<sup>1</sup>. While this filing represents Con Edison's current expectations regarding the areas into which it may inquire at the upcoming hearings, it is obviously impossible to foresee what course the cross examination by ourselves, the Power Authority, the other parties and the Board will take. Accordingly, Con Edison reserves the right to conduct additional cross examination beyond that indicated in the filed plans should such examination be warranted in our judgment by subsequent events.

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1. The remaining intervenors in this case, Union of Concerned Scientists, New York Public Interest Research Group (UCS/NYPIRG), Rockland Citizens for Safe Energy (RCSE), Parents Concerned About Indian Point, West Branch Conservation Association (WBCA), Westchester People's Action Coalition, Inc.(WESPAC), and Friends of the Earth/New York City Audubon Society (FOE/Audubon), and one participant pursuant to 10CFR §2.715(c), the Attorney General of the State of New York, have collectively filed 157 separate pieces of proposed "testimony" which they apparently seriously intended to introduce as evidence in this proceeding regarding Commission Questions 3 and 4. In addition, they seek leave of this Board for the untimely filing of the testimony of an additional 14 witnesses. These submissions are addressed in a separate joint motion of Con Edison and the Power Authority of the State of New York, Licensee of Indian Point, Unit No. 3 for an order striking the proffered testimony, dated June 14, 1982. Pending the Board's ruling on that motion, Con Edison is not presently submitting cross examination plans dealing with any of the submissions referred to supra.

Further, the filing of these plans in no way constitutes a concession on the part of Con Edison that any of the filed testimony is admissible in evidence, and we reserve the right to make any objections available to us with regard to proffered testimony or any part thereof, including the right to make motions to strike all or any portion of each document sought to be offered as evidence by any party.

SUBJECT MATTER OF EXPECTED  
CROSS EXAMINATION OF  
ROCKLAND COUNTY WITNESSES

1. Professional Qualifications.
  - a) Experience
  - b) Education
  - c) Training
  - d) Process by which testimony was prepared
  - e) Other
2. Knowledge of special conditions in Rockland County referred to in testimony.
3. Familiarity with New York State and Rockland County radiological emergency plans and revisions thereto.
  - a) Familiarity with process by which these plans were developed and Rockland County's participation in that process.
4. Knowledge of Rockland County's plans and generic capabilities for response to emergencies, including arrangements under Article 2-B of the Executive Law.
5. Knowledge of Rockland County's radiological emergency preparedness capabilities.
6. Knowledge of Rockland County residents who would be transit dependent in the event of an emergency evacuation.
7. Knowledge of NRC and State emergency preparedness criteria.

8. Knowledge of evacuation time estimates for Rockland County and assumptions on which they are based.
  - a) Basis for opinions that evacuation time estimates are incorrect or inaccurate.
9. Knowledge of behavioral response of emergency personnel during emergencies.
10. Documents, studies, etc., upon which witness' testimony is based.
11. Clarification of certain portions of testimony which may be unclear.

SUBJECT MATTER OF EXPECTED  
CROSS EXAMINATION OF  
NRC AND FEMA

1. Clarification of certain portions of testimony which may be unclear.
2. Basis for identification by FEMA of alleged deficiencies in State and County emergency plans.
3. Discussions with State emergency preparedness officials regarding resolution of alleged deficiencies in State and County emergency plans.
4. Uniformity of application of emergency response criteria from region to region and site to site.

SUBJECT MATTER OF EXPECTED  
CROSS EXAMINATION OF  
STATE OF NEW YORK WITNESSES

1. Clarification of certain portions of testimony which may be unclear.
2. Discussions with FEMA officials regarding resolution of alleged deficiencies in State and County emergency plans.

3. Comparison of State and County emergency response capabilities prior and subsequent to promulgation and interpretation of new NRC/FEMA emergency planning criteria.
4. Participation in emergency planning exercises at other New York nuclear facilities.

Respectfully submitted,

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Dated: New York, New York  
June 14, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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CERTIFICATE OF SERVICE

I certify that I have served copies of "Consolidated Edison's Cross Examination Plans For Proposed Witnesses of County Of Rockland, NRC Staff, FEMA, And State of New York Regarding Issues Related to Commission Questions 3 and 4", on the following parties by deposit in the United States mail, postage prepaid, this 14th day of June, 1982.

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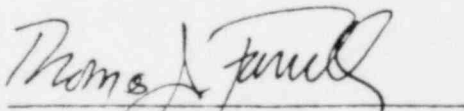
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Dated: June 14, 1982  
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