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

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)	:	June 16, 1982

GNYCE's FIRST SET OF INTERROGATORIES TO LICENSEES CON EDISON FOR INDIAN POINT #2 AND PASNY FOR INDIAN POINT #3 ON COMMISSION QUESTION #6

I. FIRST SET OF INTERROGATORIES TO BOTH LICENSEE CON EDISON FOR INDIAN POINT #2 AND LICENSEE PASNY FOR INDIAN POINT #3

For the Indian Point unit that you own, please provide the following information (if cost data are requested providing amounts in current dollars and precisely specifying in which year all expenditures will occur):

1. The current planned maintenance schedule as far as it has been determined, including specification of fuel reloading periods.

2. Descriptions of and estimates of the cost of extraordinary repairs or capital improvements to be made in the future for any reason, including meeting new NRC safety standards.

3. Expected normal O&M expenses for each year of remaining unit lifetime.

4. Expected fuel costs per kwh for each year of the remaining life; explain how these costs are determined once the present fuel contracts run out and describe these contracts and how they determine the cost of fuel.

5. The cost of decommissioning the unit via dismantlement a) after the end of the next fuel reloading cycle (again be careful to use current dollars for the annual cost streams involved and give inflation assumptions), b) in 1985, and c) at the end of the expected lifetime. Describe the technologies used in detail.

6. Explain in detail how decommissioning costs would be included in rates if the unit were retired at the end of the next fuel reloading cycle or at the end of its expected lifetime.

7. What is the expected lifetime of the unit currently and what factors will determine this?

8. What is the expected cost of temporary and permanent waste disposal of all fuel burned through the end of the next fuel reloading cycle? Indicate the extent to which these costs are currently included in O&M, and describe in detail the temporary and permanent waste disposal procedures assumed to be used.

9. What is the expected cost of temporary and permanent waste disposal of all fuel burned through the end of the planned unit lifetime? Provide other information as in (8) above for this case.

10. How is the equivalent full forced outage rate for the unit expected to change over the remaining lifetime of the unit? Show deterioration with age if any is expected. How does this translate into the annual unit availability over the remaining lifetime?

11. To what extent is it expected that the condenser tubes and steam generators will have to be sealed off due to denting, corrosion, and other causes over the remaining unit lifetime? Will this cause the unit to be derated and to what extent for each future year? Will the steam generators and/or condenser have to be replaced, and if so, when and at what cost?

12. Is Indian Point #2 still capable of running at its MDC rating of 864 MW for long periods of time? Is Indian Point #3 still capable of running at 965 MW for long periods of time?

13. If the unit were permanently shut down at the end of the next fuel loading cycle, what extraordinary costs and what O&M expenses would be incurred? Which of these costs would also be incurred at shutdown at the end of the plant lifetime, and in what amounts?

14. How are nuclear fuel costs actually included in rates? Are the costs of nuclear fuel capitalized? What is the depreciation period, etc.?

15. How are decommissioning costs currently being collected from ratepayers and how much is collected? How much is the decommissioning fund projected to be worth by unit shutdown?

16. Since the start of commercial operation, list the date and causes of each plant shutdown.

17. Itemize all other costs associated with your nuclear effort including engineering, purchasing, personnel and other staffs, legal, research and development, regulatory, emergency planning, and any other costs which could be foregone if you were a non-nuclear utility.

18. Estimate the insurance premium it would be necessary for you to remit appropriate to the liability involved in operating your Indian Point reactor were it not limited by the Price-Anderson Act.

19. List major plant components, e.g., fan cooler units, steam generators and steam turbine blades, which will need to be replaced during the expected operating life of your plant.

20. In that some of the equipment in (19) above may be replaced prior to the passage of one-third of the plant's life, state when such equipment will need replacement again, and if no such replacement is anticipated, justify that finding.

21. State how the storage and/or disposal of spent fuel and low-level waste from plant operation will be carried out throughout the life of the plant.

22. How much money has been collected to date as a provision for spent fuel disposal cost? Is this money to be used for permanent disposal costs, costs of interim storage outside of the reactor storage pool, costs associated with current onsite storage pool, or some combination of these? Please specify.

23. What price does the Company currently pay for nuclear fuel? Please supply this price in $/KgU and $/Kwh, and show the calculations used to compute each.

Please specify whether charges for miscellaneous items (such as fuel disposal) are included in the prices, and show explicitly the assumptions implicit in the costs (capacity factor, fuel exposure, thermal efficiency, etc.).

24. Is decontamination of the reactor likely to be required one or more times during the expected lifetime of the plant? If decontamination is expected, please supply schedule and cost estimates.

25. Please supply estimates of the costs, past and planned, of expanding the capacity of the spent fuel storage pool. Please indicate specifically what activities are currently underway or planned for the future.

26. Please provide a copy of the Company's annual report to FERC (Form 1) for the year ended 1981.

27. In the above form the section entitled "Steam Electric Generating Plant Statistics" (large plants), please describe in detail the development of the entry on line 21 for

fuel used at your Indian Point unit. In particular, please indicate if the reported expense includes any allowance for plant decommissioning costs, spent fuel disposal, or return on investment in fuel assemblies. In addition, please indicate all sources of difference between this number and the expense charged to FERC account 518, nuclear fuel expense.

28. Please describe the manner in which charges for spent fuel expenses are reflected in annual required revenues. In addition, please indicate for available future years the expected contribution from ratepayers for spent fuel expenditures, as well as charges made against this reserve account.

II. INTERROGATORIES TO CON EDISON ON COSTS AND TREATMENT OF INDIAN POINT #2

29. At what cost is Indian Point #2 in the rate base? Of the total, what portion is direct construction cost and what portion represents AFDC?

30. Were the tax savings associated with debt AFDC flowed through or normalized? If the latter, please provide the amortization schedule by which savings will be passed through to ratepayers.

31. Please describe the procedures and service lives by which book depreciation, tax depreciation and depreciation for calculating book taxes are developed. In addition to a full description please provide depreciation schedules for each item.

32. Please list all capital improvements or repairs

to the unit which were treated as rate base items. Please answer questions (29), (30) and (31) for every such item.

33. What property taxes have been paid for Indian Point Unit 2 annually during its life?

34. Has the Company developed estimates of future property taxes for the unit for budget forecasting or other purposes? If so, please provide these estimates.

35. If the unit were prematurely shut down, what effect would this have on property tax liability?

36. In determining required revenues, are deferred tax reserves and/or unamortized tax savings from debt AFDC and investment tax credits used to reduce the rate base or considered as part of the capital structure? If so, please describe the procedure for each item.

37. What investment tax credits were claimed for the plant and any later capital improvements or repairs?

38. What annual insurance costs have been associated with the unit? What are the major components of these costs? Please provide any projections of future costs.

39. Describe briefly all state and local income and revenue taxes, including current tax rates, for which the Company is liable.

III. INTERROGATORIES TO PASNY ON COSTS AND TREATMENT OF INDIAN POINT #3

40. How are the annual interest and amortization costs of Indian Point #3 determined? Please provide:

a) A description of the determination procedure;

b) A schedule showing past and future amortization;

c) A schedule showing past and future interest costs.

41. Please provide the unamortized indebtedness due to Indian Point #3 for each year from commercial operation through retirement.

42. For any capital improvements which were financed through bonds, please respond to items (40) and (41) above.

43. Is PASNY responsible for any property taxes or payments in lieu of taxes for Indian Point #3? If so, please provide past annual expenses and any projections of future expenses.

44. Is PASNY responsible for any other non-wage related taxes? If so, please describe briefly.

45. What annual insurance costs have been associated with the unit?

Respectfully submitted,

Dean R. Corren (GHC)

Dean R. Corren, Director

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New York, New York