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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

SERVICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges:
James P. Gleason, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

_____)	
In the Matter of)	
)	
CONSOLIDATED EDISON COMPANY OF)	Docket Nos.
NEW YORK, INC.)	50-247 SP
(Indian Point, Unit No. 2))	50-286 SP
)	
POWER AUTHORITY OF THE STATE OF)	
NEW YORK)	February 7, 1983
(Indian Point, Unit No. 3))	
_____)	

LICENSEES' MOTION TO MODIFY SCHEDULE
ON COMMISSION QUESTION 1

Consolidated Edison Company of New York, Inc. and the Power Authority of the State of New York, licensees of Indian Point Units 2 and 3, respectively, hereby move for a modification by the Atomic Safety and Licensing Board (Board) of its schedule for hearings on Commission Question 1. The licensees continue to believe that their proposed schedule, which would have presented all testimony on an issue-by-issue basis, rather than the one adopted, would be the most efficient means of conducting this portion of the proceeding, and would result in a more coherent and beneficial record. However, the licensees believe that in at least two specific instances, even given the approach

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adopted by the Board, the order of testimony is inappropriate.

First, we respectfully submit that the intervenors' presentation of witnesses Sholly, Pisello, Piccioni, Geiger, and Sidel and the Staff's presentation of witnesses on Items 8, 9, 10, and 11 should not follow the licensees' presentation of witnesses Stratton, Rodger, and Potter. At a minimum, these intervenor and Staff presentations should follow the licensees' Consequence Analysis testimony of Panel 3 and Thomas Potter, because the subject of this testimony is not closely related to the Stratton, Rodger, and Potter testimony. Although the reduced source term testimony of witnesses Stratton, Rodger, and Potter has a significant impact on the issue of the effects on public health of an accident at Indian Point, the extensive and detailed methodology and consequence analysis from the Indian Point Probabilistic Safety Study and subsequent analyses will be presented by Panel 3 and Thomas Potter. These intervenor and Staff witnesses are therefore more appropriately grouped with Panel 3, as is the testimony of Stratton, Rodger, and Potter.

Second, the licensees believe that the juxtaposition of the Staff's testimony on Items 12 through 17 with the licensees' testimony of Bernard Cohen is also inappropriate. Although we understand the Staff's desire to present their summary witnesses at the conclusion of the risk analysis

testimony, we believe that the efficiency and increased understanding of complicated issues is defeated by the scheduling of witness Cohen at that point because his testimony is intended to discuss societal risks, not to summarize the licensees' probabilistic risk analysis testimony.

Accordingly, the following incorporates the licensees' suggested modifications in the schedule:

CONSEQUENCE ANALYSIS

(1) Licensees

- Testimony on Commission Question 1 and Board Question 1.1 -- Panel 3 and Thomas Potter
- Testimony of Stratton, Rodger, and Potter on Question 1

(2) UCS/NYPIRG

- Testimony of Steven Sholly

(3) FOI/Audubon

- Testimony of Daniel Pisello and Richard Piccioni
- Testimony of H. Jack Geiger and Victor Sidel

(4) Staff

- Testimony Items 8, 9, 10, and 11

INTERVENORS' TESTIMONY ON THEORY OF PRA AND DISCUSSION OF METHODOLOGY

(1) FOE/Audubon

- Testimony of Charles Perrow and Isaac Levi

(2) UCS/NYPIRG

-- Testimony of Robert Weatherwax

STAFF'S SUMMARY

-- Testimony Items 12, 13, 14, 15, 16, and 17

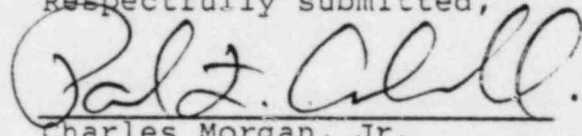
In other respects, the Board's schedule would not change.



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Respectfully submitted,



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Dated: February 7, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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NEW YORK)	
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)	

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of February, 1983,
I caused a copy of the Licensees' Motion to Modify Schedule
on Commission Question 1 to be served by first class mail,
postage prepaid on the following:

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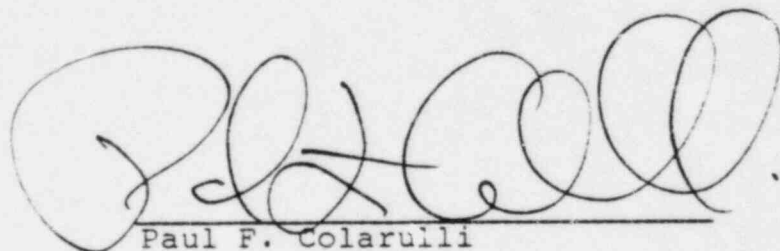
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