Testimony of

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Before the

United States House of Representatives

Subcommittee on Energy and Conservation

of the

Committee on Energy and Commerce

Washington, D.C.
October 1, 1982

My name is John D. O'Toole, and I am a Vice President of Consolidated Edison Company of New York, Inc., the licensee of the Indian Point Unit 2 nuclear power plant. My responsibilities include project coordination for the Indian Point hearings. My ongoing responsibilities include nuclear engineering, quality assurance and reliability. I am an engineer by training and do not purport to be an expert in legal matters. I have therefore consulted in the preparation of this testimony with Company counsel. I appear before the House Subcommittee on Energy Conservation and Power of the Committee on Energy and Commerce today pursuant to the Subcommittee's September 22 letter requesting our appearance to address the role of public participation in Nuclear Regulatory Commission proceedings before its Atomic Safety and Licensing Boards, and the role of emergency planning and risk assessments in such proceedings. Our views on these subjects derive from our ongoing participation in an investigatory proceeding relating to the Indian Point plants. Because this proceeding differs in several major respects from regular NRC licensing proceedings, we have no reason to believe that our views are necessarily similar to those of participants in such frequently encountered NRC licensing proceedings.

While I am prepared to appear and answer your questions relating specifically to the Indian Point hearings, as set forth in our August 12 letter we believe that serious questions are presented with respect to the Subcommittee's questioning of the Commissioners of the NRC. We have reviewed a copy of the Subcommittee's letter to Chairman Palladino of the NRC dated September 22, 1982 requesting the Commissioners' testimony before this

Subcommittee. The letter lists the issues that the Commissioners are requested to address in their testimony. Under applicable judicial rulings it is in our view improper for the Subcommittee to question the Commissioners on the enumerated issues, and thereby to intrude upon the Commission's handling of the hearings while they are in progress. Since it may become necessary for us to invoke these legal principles at some later time, we register our objection to the Subcommittee's questioning of the Commissioners on the subjects listed in its September 22 letter.

Regarding the hearings themselves, the Commission's interest in conducting an investigatory proceeding relating to the Indian Point plants stems from a petition filed by the Union of Concerned Scientists. That petition contended that the demographic characteristics of the Indian Point site posed special safety considerations not present at other nuclear sites. The petition did not, however, address radiological emergency preparedness at Indian Point.

After a thorough review of the UCS' claims, the NRC staff found them to be without merit in a lengthy analysis and decision issued in February 1980. Subsequently, in May 1980, a special NRC Task Force was established to examine the level of safety at Indian Point as a basis for determining whether the plants should continue to operate while the Commission determined what further actions, if any, were appropriate. The Task Force concluded that even given the site characteristics, the aggregate risk of Indian Point to surrounding populations was about the same as a typical nuclear plant on a typical site. This conclusion was based in part on the fact that

the Indian Point plants have safety systems and procedures not found in many nuclear plants, and these systems and procedures, because of the extra margin of safety they provide, fully make up for the larger surrounding population. Indeed, the Task Force found that the risk to people residing near Indian Point is 30 to 50 times less than at a typical plant and site.

Even after receiving these reports -- prepared not by the Indian Point licensees but by the NRC's own staff -- the Commission's evident desire to be thorough caused it to initiate further investigation, including public hearings, into the safety levels at Indian Point. To that end, the Commission ordered hearings before an Atomic Safety and Licensing Board.

The Indian Point investigatory hearings are unique in the history of the Atomic Energy Act. To our knowledge, the NRC has never previously exercised its investigatory powers in such a proceeding. We believe that the fundamental differences between this type of proceeding and other proceedings which relate to the obtaining of a nuclear power plant operating license fully explain why different rules for testimony have been imposed by the NRC in this special Indian Point proceeding.

Public hearings are, however, not unknown in connection with Indian Point. After separate full public hearings in which intervenors appeared with counsel, the operating license for Indian Point Unit No. 2 was granted in 1973, and the operating license for Unit No. 3 was granted in 1976. What this in effect meant was that a final decision had been reached that the Indian Point plants could and would be operated in compliance with the requirements of the Atomic Energy Act. Former NRC Chairman

Anders testified before Congress in 1976 that "the safety review leading to the issuance of an operating license for the Indian Point [Unit] 2 involved over 20 man-years of work by our staff."* Subsequently, public hearings were held in 1976 by the Joint Congressional Committee on Atomic Energy to assess allegations by Mr. Robert Pollard relating to the safety of Indian Point. A review of these allegations resulted in a 1976 Commission report concluding that:

> "Adequate protection is presently provided for the public at Indian Point Units 2 and 3. The safety reviews conducted by the NRC staff, the ACRS, and the Atomic Safety and Licensing Board indicate that adequate consideration has been given to each of the technical subjects presented by Mr. Pollard."**

The present Indian Point hearings thus do not address the wide variety of issues which can and often are raised in connection with proceedings to obtain a license, or which have already been the subject of other proceedings. This phase in the life of the Indian Point plants was completed many years ago. The current hearings instead serve a very different purpose, which in light of the claims in the original UCS petition the Commission decided should be much narrower and more focused than would obtain in a regular licensing proceeding.

Since there was no claim in the UCS petition that the Indian Point plants failed to meet any applicable NRC regulations, and since the plants were already licensed and operating, the Commission fashioned a proceeding to focus on much different issues. Because the hearing was fully

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*Investigation of Charges Relating to Nuclear Reactor Safety: Hearings before the Joint Committee on Atomic Energy, 94th Cong., 2nd Sess. 264 (March 2, 1976).

**Id., Vol. 2 at 1048.

discretionary with the Commission, and not required by any provision of the Atomic Energy Act, the Commissioners had discretion to specify exactly what topics they wished to be considered, and to what extent. As with earlier phases of this series of events, dating to the original UCS petition, the fundamental issue to the Commission was "How safe is Indian Point compared to other nuclear plants." While the Commission might have considered a myriad of other topics, it decided that given the specific assertions of the UCS petition regarding population, it wished to focus on this particular question.

In two Orders issued on January 8 and September 18, 1981 addressed to the Atomic Safety and Licensing Board appointed to conduct the investigatory hearings, the Commission expressly stated that:

> "The Commission's primary concern is the extent to which the population around Indian Point affects the risk posed by Indian Point as compared to the spectrum of risks posed by other nuclear plants."

These Commission Orders also permitted other subjects, such as economics and emergency planning, to be raised in the hearings, but the investigation's major focus was clearly intended by the Commission to be the risk posed by the Indian Point plants. Based on my observations, the Commission did everything possible to avoid a situation where every issue in nuclear power today would be taken up in the Indian Point hearings. Such issues are more appropriately dealt with in generic rulemaking proceedings conducted under well-established NRC procedures.

I sat in the audience along with intervenors and other interested parties at numerous public meetings of the Commission in 1980 and 1981 while the nature and

orientation of the investigatory proceedings were discussed. It is clear that in its earlier Orders, the Commission was creating a special proceeding which would focus on matters of particular interest to the Commission, so as to avoid the prolonged licensing-type proceedings which often drag on for years and years. The Commission expressly asked the Licensing Board to complete its tasks within a one year period.

To accomplish its particular aims, the Commission's earlier orders contained several specific provisions which were to keep the proceedings well-focused. First, prospective parties to the hearings were required to come forth with particular contentions, backed up by specific underlying factual bases, as required in all other NRC proceedings by the NRC's Rules of Practice.

Second, parties proposing new, additional safety measures which are not now required by NRC regulations would initially have to show that significant risk existed without the proposed measure, and that the measure being proposed would significantly reduce that risk. Except under these circumstances, the Commission directed that parties to the proceeding could not challenge NRC regulations, but would be required to follow normal NRC procedures for proposing changes to current regulations. If the Commission were to have provided otherwise, in our judgment, the hearings would indeed have been interminable.

Third, the Commission in its earlier Orders made specific provision for how risk issues were to be addressed in the hearings. The tool which the Commission selected in order to quantify risk at Indian Point is called

probabilistic risk assessment, which is a methodology for review of complex systems to determine what could possibly go wrong, and with what frequency. The assessment includes all conceivable scenarios which result in serious system damage and goes on to calculate the consequences of the damage as well as the probability of their occurrence. The technique has been used for many years by the military, private sector (aircraft and space) and other areas. The Commission acknowledged there are uncertainties that attend such numerical calculations, but concluded that such risk assessment methods offered the best means available for objective and quantitative comparisons of the safety levels at Indian Point with other plants.

By September 18, 1981, when the Commission issued its second Indian Point Order, it was quite clear that the Commission had fashioned a special proceeding designed to achieve certain Commission purposes, and which was to be conducted according to guidelines specifically set forth by the Commission. Those who have opposed the Commission's most recent Order did not register even a note of complaint about the hearing's requirements when they were originally set forth over a year ago. This is indeed peculiar, since the Commission's most recent orders simply reaffirm the requirements of its original directives.

Beginning in late 1981, the Licensing Board started to prepare for the hearings. Prospective intervenors lost no time in proposing issues and approaches to such issues which disregarded the Commission's careful instructions. First, prospective intervenors advanced vague claims without offering any factual support for them. Second, so-called additional safety measures were proposed for Indian Point without meeting the Commission's

requirement that they be "real world" solutions to "real world" problems. Third, the prospective intervenor groups postulated the direst of consequences due to the most incredible accidents, disregarding the Commission's admonition that quantitative risk assessment methods be used, which includes consideration of the probability of such consequences. Equally important, however, was the fact that these groups dwelled on issues generic to the entire nuclear power industry; issues which had no particular application to Indian Point, and thus offered no assistance to the Commission in answering the question of how Indian Point safety compares with safety levels at other plants.

On December 31, 1981 and again on February 11, 1982, Con Edison, the NRC's own Staff personnel, and also the Power Authority of the State of New York, licensee of Indian Point Unit No. 3, each filed detailed memoranda with the Licensing Board indicating just how the prospective intervenor groups had disregarded the Commission's prior Orders. I offer these memoranda into the Subcommittee's record. There is not a single conclusion reached in the Commission's recent Orders which was not pointed out by the NRC's own Staff and the licensees more than eight months ago. It thus came as a surprise to us when on April 23, 1982 the Licensing Board uncritically accepted most of the contentions put forth by these intervenors, since many of them clearly were in conflict with the requirements laid down by the Commission.

Believing that the Licensing Board had seriously misjudged the Commission's original intent, on May 10, long before the commencement of the hearings, the licensees asked the Commission to review the Licensing Board's ruling

on contentions. On June 1, the NRC's staff filed its own memorandum with the Commission, joining the licensees in asking the Commission to correct the manifest errors committed by the Licensing Board. While some have characterized the Commission's recent Orders as changing the rules in midstream, this is certainly not the case. Not only are the recent Orders faithful to the Commission's original guidance, but both the licensees and NRC staff sought to have those rulings of the Board which were inconsistent with that guidance corrected well before the commencement of the hearings in late June.

I should perhaps add a note about our motivation for seeking Commission review prior to the start of the hearings. We originally decided to participate in the hearings, although we were not required by the Commission to do so, because we believe that the hearings offer an unprecedented opportunity to inform the public of the plant's safety in a visible forum where responsible opponents of nuclear power can be given an opportunity to have their claims about this particular plant carefully weighed by fair, impartial and respected government officials -- the Commission itself.

We have always believed that the paramount purpose of the Indian Point hearings was to convince all interested persons -- from the most technically skilled engineers to the electric consumers who live and work near the plant -- that Indian Point was at least as safe as other nuclear power plants located throughout the country, and that the plant poses much less of a hazard to the public health and safety than many other risks which each of us face every day in a modern technological society. While the yardstick which the Commission has selected to quantify Indian

Point's risk is far from perfect, it is nonetheless the best tool available for examining in an objective and dispassionate manner just how safe the plants are. This specific goal for the proceeding necessarily imposes a certain discipline on the participants to stay within the scope of the hearing. But the course which had been charted by the Licensing Board clearly would have frustrated these purposes, rather than furthered them, as the Commission's latest Orders have recognized.

Let us now turn to the Commission's July 27 Order itself. I would like to particuarly emphasize that this Order does not narrow the focus of the Indian Point hearings one iota from the guidelines set forth in the Commission's earlier Orders. No issues that the Commission had previously intended to be included are now to be excluded. What this latest Order does do is tell the Licensing Board that it must carefully follow those original instructions, without the distracting and misleading meanderings which might otherwise have been permitted. The latest Commission Orders will not permit intervenor groups to portray "what ifs" without regard to how frequently they can actually be expected to occur. The Order will not permit claims to be made without any underlying factual bases, and will also exclude issues which have no special bearing upon the risk of the Indian Point units. What the Order does do is require all parties to promptly set about answering the question "How safe is Indian Point." This is the question which both the Commission and the public want answered, and the July 27 and September 17 Commission Orders are a necessary step to achieve that goal.

I would like to address two remaining topics relating to the special Indian Point proceeding because I understand that they are of particular interest to the Subcommittee. The first is the role of the public in NRC investigatory proceedings, and the second is the role of radiological emergency planning. With respect to public participation in the hearings, we must keep in mind that this is an investigatory proceeding established by the Commission to inquire into the very specific issue of how the risk of Indian Point compares with other nuclear plants. Those who have argued that public participation has been curtailed have as their implicit premise that any issue relating to nuclear power ought to be able to be raised in the Indian Point hearings. However correct this point of view might be in ordinary licensing proceedings, it is inaccurate in such a unique proceeding as this, with a very specific purpose carefully articulated by the Commission at the outset.

Even given the focused objectives of this proceeding, the Licensing Board has bent over backwards to provide the broadest possible opportunity for the public to make their views known. On numerous occasions throughout the proceeding literally scores of interested citizens have made limited appearance statements of their points of view, and both the licensees and the Licensing Board have considered those statements in formulating their respective positions.

For those groups who have sought and obtained full intervenor status in the hearings, we have faced truly formidable adversaries who have been represented by able counsel. Opposing the licensees in the hearings is the Union of Concerned Scientists, which for the year ending

February 28, 1981 raised $1,528,619 and spent $346,564 on nuclear safety research. Another intervenor is the New York Public Interest Research Group, Inc., which raised $1,420,242 for the year ending August 31, 1980. In certain testimony these intervenors have been joined by the New York Audubon Society, and the Attorney General of the State of New York, who have also been represented by counsel.

These adversaries have been formidable and resourceful, and we have seen no evidence that they have lacked sufficient resources. For example, at the first evidentiary session of the hearings, intervenor counsel outnumbered the combined licensees' counsel, not including the many other full-time representatives of intervenors who made appearances on their behalf.

The philosophy of the Atomic Energy Act is that the NRC's own Staff -- operating independently of the Commission -- represents the public interest in proceedings before the NRC. This approach is used in countless federal regulatory agencies, and we see it working well in the Indian Point proceeding. On numerous occasions the NRC Staff has taken positions which differ from those of both licensees and intervenors, and we believe that the Staff's independence is beyond question.

Con Edison has taken these hearings very seriously because public confidence in the safety of Indian Point is at stake, and because Indian Point plays such a vital role in the economy of the New York City Metropolitan area. The unavailability of these units would result in increased replacement fuel costs of over half a billion dollars annually to people who already pay high rates for their electricity, while other areas of the country with which New York City competes for jobs and business would continue

to enjoy the economic benefits of nuclear power.

The importance of these hearings and the availability of Indian Point to our customers has not in our view been incompatible in any way with widespread public participation. In the positions which we have taken before the Board and the Commission, we have only asked that the original intention to focus the proceeding on whether the plant is safe not be distracted by endless preoccupation with unrelated issues. We have not sought to limit the participation of any party who is prepared to address those issues.

The last topic which I would like to address is the role of emergency planning in these proceedings. We at Con Edison place the highest importance upon effective emergency planning, and have been working with the NRC, FEMA and state and local governments to see that such planning is improved and deficiencies corrected. On July 30, 1982, FEMA issued its findings that there were five significant deficiencies in the off-site radiological emergency response preparation of the State of New York and local governments in the vicinity of Indian Point. Even though the deficiencies found by FEMA relate to off-site emergency planning, because emergency planning is such an important priority for the licensees, we have made a major commitment of our own resources to helping the state and local governments correct these deficiencies.

We are confident that we and the responsible governmental entities will be able to respond to the FEMA criticism in a constructive manner. We place substantial weight upon FEMA's conclusion that it views all of the alleged deficiencies as correctable, and indeed we have been advised by the responsible New York State officials

that several of the deficient items have already been corrected.

Overall in the emergency preparedness area, Con Edison sees a steady pattern of improvement in off-site preparedness. It should be remembered that new, more comprehensive radiological emergency planning requirements have only been in place since mid-1981, and it will naturally take some time for state and local governments to "work the bugs out" of new and sometimes unfamiliar plans. The very process by which all of the participants worked to develop the current plans has helped immeasurably in improving radiological emergency preparedness beyond what it was just a few months ago. We believe that emergency preparedness will improve as the State and counties gain greater experience with its own comprehensive plans and also the NRC's requirements. In the meantime, the State of New York has advised us that in the extremely unlikely event that it should ever be necessary to implement the emergency plan at Indian Point, adequate steps could and would be taken to protect the public.

Because the status of radiological emergency planning is presently undergoing change in response to the FEMA evaluation, we believe that the Commission correctly deferred its consideration to a later stage of the proceeding. The Commission in effect said that the principal mission of this proceeding was to insure that the plant was safe, and that much of the continuing NRC involvement in emergency planning would proceed collaterally to the hearings. While we strongly believe in effective emergency planning, at Con Edison we are firmly convinced that our first line of defense is to do everything possible to prevent the plan from ever being

needed. It is this issue -- what is the risk of the plant itself -- that the Commission has identified as paramount in these hearings.

As it was, in the initial hearing sessions the interminable preoccupation with emergency planning details was preventing the parties from turning to the question of plant risk. Were the over 200 witnesses proposed by intervenors permitted to testify, and had the Commission not interceded, the hearings would not have turned to the key risk issues for months or even years. We believe that the Commission's recent Orders reiterate the framework for examining this important question.

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ATTACHMENTS TO THE
TESTIMONY OF
JOHN D. O'TOOLE

1. Con Edison's Memorandum Respecting Contentions Proposed By Prospective Intervenors. 12/31/81

2. Power Authority Objections and Answers to Contentions of Potential Intervenors. 12/31/81

3. NRC Staff Response to Contentions of 10 C.F.R. § 2.714 Petitioners. 12/31/81

4. Con Edison's Reply Memorandum Respecting Contentions Proposed By Prospective Intervenors. 2/11/82

5. Authority's Reply to Responses to Objections to Contentions of Potential Intervenors. 2/11/82

6. NRC Reply to Petitioner's Answers to Opposition to Their Petitions for Leave to Intervene. 2/11/82

7. Licensee's Petition for Directed Certification Pursuant to 10 C.F.R. § 2.718(i) and for Waiver of 10 C.F.R. § 9.103 5/10/82

8. NRC Staff Response in Support of Licensee's Request for Certification and for Waiver of 10 C.F.R. § 9.103. 6/1/82

ATTACHMENT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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

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)	:	

CERTIFICATE OF SERVICE

I certify that I have served copies of "Testimony of John D. O'Toole, Vice President, Consolidated Edison Company of New York, Inc., before the United States House of Representatives Subcommittee on Energy and Conservation of the Committee on Energy and Commerce" on the following parties by deposit in the United States mail, postage prepaid, this 30th day of September, 1982.

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Dated: September 30, 1982
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