UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CONSOLIDATED EDISON COMPANY OF NEW YORK
(Indian Point Unit 2)

POWER AUTHORITY OF THE STATE OF NEW YORK
(Indian Point Unit 3)

February 19, 1982

UCS/NYPIRG CORRECTIONS TO RESPONSE TO OBJECTIONS TO CONTENTIONS

The following corrections to UCS/NYPIRG Response to Objections should be noted:

Page 3, footnote **: SAND 79-0369 (NUREG CR/0743), at 3.5, p. 64.

Page 21, fourth paragraph:

- 6) Con Edison's most frequent objection to the bases of Contention I-A, as well as to the other contentions, is that an accident scenario must be described before consequences of an accident can be the subject of any contention. Objections to Bases 6, 10, 11, 12, 13, 14 and 15, at pp. 56, 59-62. This objection is discussed in the Introduction, Point I-A, supra, pp. 2-4.
- Page 33, bases 2 and 4: See, Prepared Testimony of Kai T. Erikson . . .; (See, Erikson, op. cit.).
- Page 35, amended contention I(B)(I): . . . as is required by 10 CFR 50.47(b); 50.54(s)(2); . . .
- Page 82, basis 1 for Contention III(b): . . . with Class D stability, 4 m/sec (meters per second) wind . . .
- Page 88, second paragraph:

 UCS/NYPIRG maintain the position stated in Contention

 IV(E), but withdraw the Contention since it does not present any litigable facts.

UCS/NYPIRG will not respond further to objections to contentions since no new objections were introduced in the February 11, 1982 submissions of the Staff and the Licensees.

New York, New York February 26, 1982

Respectfully submitted,

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CONSOLIDATED EDISON COMPANY OF NEW YORK (Indian Point Unit 2)

POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point Unit 3)

Docket Nos. 50-247 SP 50-286 SP

March 1, 1982

Certificate of Service

I hereby certify that copies of:

UCS/NYPIRG ANSWER TO NRC STAFF MOTION TO STRIKE UCS/NYPIRG OBJECTIONS AND IN THE ALTERNATIVE, MOTION FOR I WE TO RESPOND TO STAFF'S AND LICENSEES' STATEMENT OF POSITION; and

UCS/NYPIRG CORRECTIONS TO RESPONSE TO OBJECTIONS TO CONTENTIONS

have been served on the official minimum service list for the above captioned proceeding by depositing in the United States mail, first class,

this 1st day of March , 1982.

Amanda Potterfield, Esq.

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

CONSOLIDATED EDISON COMPANY OF NEW YORK (Indian Point, Unit 2)

POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit 3) Docket Nos. 50-247 SP 50-286 SP

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