

Union of  
**CONCERNED  
SCIENTISTS**

'83 MAR 16 A11:09

March 14, 1983

James P. Gleason, Chairman  
Frederick J. Shon, Member  
Oscar H. Paris, Member  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

RE: Indian Point Special Proceeding  
Docket Nos. 50-247, 286

Gentlemen:

We have just received a copy of a letter sent to you from Paul J. Amico, a copy of which is attached. Mr. Amico has been hired by the Board to review the evidence in this record concerning accident probabilities for Indian Point and to make recommendations with regard to its "completeness."

Mr. Amico writes to "clarify" and "document" his independence from issues relating to the Indian Point Probabilistic Safety Study. The language used in his letter raises questions which we believed must be resolved before one could conclude that Mr. Amico brings the requisite independence to this assignment. In particular, we are concerned about the notable qualifications contained in two statements. First, he writes that he was not "involved in any meetings with [Con ED or PASNY] during which discussions were held of the IPPSS results or strategy regarding the use of IPPSS during these hearings." This raises the obvious question of whether Mr. Amico has had any relationship with Con ED or PASNY (or the NRC Staff) and, if so, its precise nature.

The second general area of concern is Mr. Amico's statement that he knows some of the witnesses "quite well" and has "worked closely with some of them in the past." The parties are entitled to know the precise nature of Mr. Amico's relationship with any witnesses in this case.

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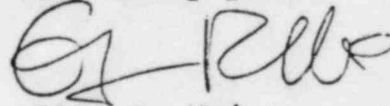
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Ltr. to Judges Gleason, Shon, & Paris,  
March 14, 1983  
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We therefore request that the Board direct Mr. Amico to file a complete resume, stating his past work experience, whether he has testified in any forum on related subjects, and including a full discussion of any current or past relationship with Con ED, PASNY or the NRC Staff. In addition, Mr. Amico should be directed to state which witnesses he has worked with and the nature of the projects involved.

The above information is necessary in order for the parties and the Board to evaluate the degree of independence Mr. Amico brings to his evaluation of the evidence in this case.

Very truly yours,



Ellyn R. Weiss  
Jeffrey M. Blum  
Counsel for the Union of  
Concerned Scientists

Enclosure: As stated

cc: Indian Point  
Service List



# Applied Risk Technology Corporation

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March 1, 1983

'83 MAR 10 A10:25

James P. Gleason, Esq., Chairman  
Mr. Frederick J. Shon  
Dr. Oscar H. Paris  
Administrative Judges  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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50-247/286

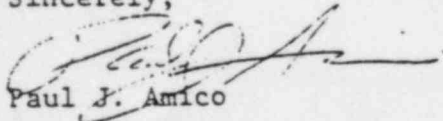
Dear Administrative Judges:

As requested, I am writing this letter to clarify and document my independence from issues relating to the Indian Point Probabilistic Safety Study (IPPSS) prior to being engaged by the ASLB as a technical consultant. Specifically, I wish to assure you of my independence in four areas.

- 1) At no time was I involved in either the IPPSS work itself or in any of the NRC staff or intervenor reviews of the IPPSS.
- 2) At no time was I involved in the analysis or preparation of NUREG/CR-2497, generally known as the precursor study.
- 3) At no time was I involved in any meetings with representatives of Consolidated Edison or the Power Authority of the State of New York during which discussions were held of the IPPSS results or strategy regarding the use of the IPPSS during these hearings.
- 4) I have reviewed the list of witnesses and, although I know some of them quite well and have worked closely with some of them in the past, I am not now involved in any work with them and hold no bias with regard to critiquing any of their testimony.

I declare the above statements to be true and would be willing to submit them as sworn testimony at any time if the board feels it to be necessary.

Sincerely,



Paul J. Amico

PJA/dba