

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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

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In the Matter of	:	
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)	:	April 22, 1983

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POWER AUTHORITY'S MOTION TO
STRIKE SELECTED INTERVENOR
TESTIMONY RELATING TO MARCH 3, 1983 EXERCISE

ATTORNEYS FILING THIS DOCUMENT:

Charles Morgan, Jr.
Paul F. Colarulli
Joseph J. Levin, Jr.
MORGAN ASSOCIATES, CHARTERED
1899 L Street, N.W.
Washington, D.C. 20036
(202) 466-7000

8304280044 830422
PDR ADOCK 05000247
G PDR

DS03

Preliminary Statement

New York Power Authority ("Power Authority"), licensee of Indian Point 3 Nuclear Power Plant, hereby moves for an order striking the portions of direct testimony indicated below filed by the various intervenors herein regarding the March 9, 1983 exercise. The Power Authority reserves its rights to move to strike additional testimony at the time each witness is presented, based, inter alia, on voir dire, pending discovery, or subsequent developments.

TESTIMONY TO BE STRICKEN

Objection Abbreviations

- (C) Cumulative and/or repetitive
- (Co) Conclusory
- (F) Inadequate foundation
- (H) Hearsay and/or lack of personal knowledge
- (R) Irrelevant, immaterial, and/or beyond scope of Commission Questions 3 and 4 or March 3, 1983 exercise
- (S) Speculative

<u>Witness or panel</u>	<u>Page (Line)</u>	<u>Objections</u>
Powell	2(2)-(5)	H
	2(14)-(22)	H
Bower	1(12)-(13)	R
	1(22)-2(3)	H
	2(4)-3(7)	Co, H, R, S
	3(19)-end	R, Co
Mills	1(11)-(12)	Co
	1(13)-(23)	H
	1(24)-(26)	Co
	1(29)-(30)	R, S, H
	1(34)-(35)	R, Co
	2(6)-(15)	R
	2(23)-(25)	H, F
	2(26)-(34)	H
	2(44)-(50)	H, F
	2(52)-(54)	S, Co, R
	3(2)-(4)	S, Co, H
	3(5)-(7)	H
	3(14)-end	R
	Duffee	2(41)-(51)
Linden/Layefsky	1(4)-(26)	H
Waters	1(10)-(11)	H, R
	1(15)-(16)	H
	2(20)-end	Co, R
	3(4)-end	R, S

<u>Witness or panel</u>	<u>Page (Line)</u>	<u>Objections</u>
Lebid	1(32)-(34)	H
	2(12)-(17)	H, R
	2(32)-end	S, Co, R, H
Saltzman	1(2)-(4)	H
	1(12)-(15)	F, S, Co
	1(17)-end	H
	3(27)-(28)	H, S
Wexler	1(4)-end	H
	4(1)-(18)	H, R
	4(34)-(35)	R, F, H
	6(37)-(38)	H, R
	6(41)	H, R
	7(1)-(2)	H
Hickernell	1(12)-(14)	H, F, R
	1(27)-(29)	H, R
	2(31)	H
	3(2)	H
	3(25)-(28)	H, R
	3(6)-(9)	H
	4(20)-(31)	H, F, R, S
Plage/Sanchez/Indusi	1(1)-(8)	H, Co
	1(10)-(11)	H, R, S
	1(13)-(20)	H, R, F
	1(31)-end	H
Hochman	1(1)-4(3)	R, C
Northrup	All	R, C
Martin J. Larkin	1(1)-(7)	F, R
	1(22)-end	H, S, R
Mary Miller Larkin	1(17)-(32)	H, F
	1(34)-(37)	H, F
	2(13)-end	R
Poritzky	2(21)-end	H, F, R, Co
Robock	1(7)-(15)	R, S, Co, H
	1(24)-(29)	F, H
	1(30)-(32)	F, H
	1(35)-(36)	F, H
	1(40)-(44)	Co, S, H, F

Robock (continued)

2(9)-(15)	H
2(27)-(30)	H, R
3(4)-(9)	S, H, R
3(23)-(25)	H
4(2)-(4)	H
4(9)-(11)	H
4(19)	H
4(21)-(22)	H, F
4(24)-(25)	H
5(15)-(16)	H
5(22)-(23)	H
5(24)-(25)	H
5(31)	H
6(1)-(4)	H
6(7)-(8)	H

Lane

1(5)-(7)	H, F
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Toscani/Feit/
Culpepper

1, ¶4	Co, F, R
1, ¶5	S, F
1, ¶6	H, F, Co, R
1, ¶7	H, Co, F
1, ¶9(2)-(3)	R
2, ¶2	H, R, C
2, ¶3	H, F
2, ¶4	H
2, ¶6	H, S, Co
2, ¶7	H
2, ¶10	C, H
2, ¶11	H, R
2, ¶15-¶18	H
2, ¶22	H, R
2, ¶23	H
2, ¶25-¶26	H
2, ¶29	H, F
2, ¶31	H, R
2, ¶37	H
2, ¶39	H, R
2, ¶54-¶55	H

Spilka

1(1)-(7)	H
2(7)-(9)	H, R
3(20)-end	S, Co, R

Respectfully submitted,

Charles Morgan, Jr.
Charles Morgan, Jr.
Paul F. Colarulli
Joseph J. Levin, Jr.

MORGAN ASSOCIATES, CHARTERED
1899 L Street, N.W.
Washington, D.C. 20036
(202) 466-7000

Stephen L. Baum
General Counsel
Charles M. Pratt
Assistant General Counsel

NEW YORK POWER AUTHORITY
Licensee of Indian Point
Unit 3
10 Columbus Circle
New York, New York 10019
(212) 397-6200

Bernard D. Fischman
Michael Curley
Richard F. Czaja
David H. Pikus

SHEA & GOULD
330 Madison Avenue
New York, New York 10017
(212) 370-8000

Dated: April 22, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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CONSOLIDATED EDISON COMPANY OF NEW YORK,) 50-247 SP
INC. (Indian Point, Unit No. 2)) 50-286 SP
)
POWER AUTHORITY OF THE STATE OF NEW YORK) April 22, 1983
(Indian Point, Unit No. 3))
)

CERTIFICATE OF SERVICE

I hereby certify that copies of POWER AUTHORITY'S MOTION TO STRIKE SELECTED INTERVENOR TESTIMONY RELATING TO MARCH 9, 1983 EXERCISE in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 22nd day of April, 1983.

Docketing and Service Branch
Office of the Secretary
U. S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Ellyn R. Weiss, Esq.
William S. Jordan, III, Esq.
Harmon & Weiss
1725 I Street, N.W., Suite 506
Washington, D.C. 20006

James P. Gleason, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing
Board
513 Gilmoure Drive
Silver Spring, Maryland 20901

Joan Holt, Project Director
Indian Point Project
New York Public Interest
Research Group
9 Murray Street
New York, N.Y. 10007

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Janice Moore, Esq.
Counsel for NRC Staff
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Brent L. Brandenburg, Esq.
Assistant General Counsel
Consolidated Edison Co.
of New York, Inc.
4 Irving Place
New York, N.Y. 10003

Jeffrey M. Blum, Esq.
New York University Law
School
423 Vanderbilt Hall
40 Washington Square South
New York, N.Y. 10012

Charles J. Maikish, Esq.
Litigation Division
The Port Authority of
New York and New Jersey
One World Trade Center
New York, N.Y. 10048

Marc L. Parris, Esq.
Eric Thorsen, Esq.
County Attorney
County of Rockland
11 New Hemstead Road
New City, N.Y. 10956

Ezra I. Bialik, Esq.
Steve Leipsig, Esq.
Environmental Protection Bureau
New York State Attorney
General's Office
Two World Trade Center
New York, N.Y. 10047

Joan Miles
Indian Point Coordinator
New York City Audubon Society
71 West 23rd Street, Suite 1828
New York, N.Y. 10010

Andrew P. O'Rourke
Westchester County Executive
148 Martine Avenue
White Plains, N.Y. 10601

Greater New York Council on
Energy
c/o Dean R. Corren,
Director
New York University
26 Stuyvesant Street
New York, N.Y. 10003

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Andrew S. Roffe, Esq.
New York State Assembly
Albany, N.Y. 12248

Honorable Richard L. Brodsky
Member of the County
Legislature
Westchester County
County Office Building
White Plains, N.Y. 10601

Renee Schwartz, Esq.
Paul Chessin, Esq.
Laurens R. Schwartz, Esq.
Margaret Oppel, Esq.
Botein, Hays, Sklar & Herzberg
200 Park Avenue
New York, N.Y. 10166

Phyllis Rodriguez,
Spokesperson
Parents Concerned About
Indian Point
P.O. Box 125
Croton-on-Hudson, N.Y. 10520

Stanley B. Klimberg
General Counsel
New York State Energy Office
2 Rockefeller State Plaza
Albany, New York 12223

Charles A. Scheiner, Co-
Chairperson
Westchester People's Action
Coalition, Inc.
P.O. Box 488
White Plains, N.Y. 10602

Honorable Ruth Messinger
Member of the Council of the
City of New York
District No. 4
City Hall
New York, New York 10007

Alan Latman, Esq.
44 Sunset Drive
Croton-on-Hudson, N.Y. 10520

Richard M. Hartzman, Esq.
Lorna Salzman
Friends of the Earth, Inc.
208 West 13th Street
New York, N.Y. 10011

*Zipporah S. Fleisher
West Branch Conservation
Association
443 Buena Vista Road
New City, N.Y. 10956

Mayor George V. Begany
Village of Buchanan
236 Tate Avenue
Buchanan, N.Y. 10511

Judith Kessler, Coordinator
Rockland Citizens for Safe
Energy
300 New Hempstead Road
New City, N.Y. 10956

David R. Lewis, Esq.
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Donald Davidoff
Director, Radiological
Emergency Preparedness
Group
Empire State Plaza
Tower Building, RM 1750
Albany, New York 12237

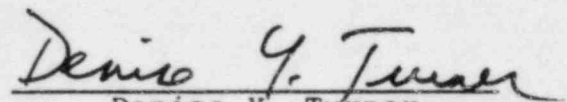
Stewart M. Glass
Regional Counsel
Room 1349
Federal Emergency Management
Agency
26 Federal Plaza
New York, New York 10278

**Amanda Potterfield, Esq.
New York Public Interest
Research Group, Inc.
9 Murray Street,
3rd Floor
New York, N.Y. 10007

Melvin Goldberg
Staff Attorney
New York Public Interest
Research Group
9 Murray Street
New York, New York 10007

Steven C. Sholly
Union of Concerned Scientists
1346 Connecticut Ave., N.W.
Suite 1101
Washington, D.C. 20036

Spence W. Perry
Office of General Counsel
Federal Emergency Management
Agency
500 C Street, Southwest
Washington, D.C. 20472


Denise Y. Turner

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