

DOCKETED
USNRC
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

James P. Gleason, Chairman

Frederick P. Shon

Dr. Oscar H. Paris

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In the Matter of :

CONSOLIDATED EDISON COMPANY OF : Docket Nos.
NEW YORK, INC. :
(Indian Point, Unit No. 2) : 50-247 SP
: 50-286 SP

POWER AUTHORITY OF THE STATE OF :
NEW YORK : April 22, 1983
(Indian Point, Unit No. 3) :
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LICENSEES' MOTION FOR ADMISSION
INTO EVIDENCE OF EPZ TOUR DOCUMENTS

ATTORNEYS FILING THIS DOCUMENT:

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Preliminary Statement

Consolidated Edison Company of New York, Inc. ("Con Edison"), licensee of Indian Point Station, Unit No. 2 and New York Power Authority ("Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), hereby move the Board to identify and receive into evidence as Exhibits CE-11, CE-11A and CE-11B, respectively, the annexed affidavit of Michael S. Della Rocca sworn to April 19, 1983 (CE-11); a five-page document entitled "Tour of Indian Point EPZ, April 13, 1983, Itinerary" (CE-11A); and a map entitled "Roadway Tour of Indian Point EPZ and County EOCs" (CE-11B).

Nature of the Documents

Exhibit CE-11

Exhibit CE-11 is an affidavit sworn to on April 19, 1983 by Mr. Della Rocca, an employee of Parsons, Brinckerhoff, Quade & Douglas, Inc. under whose direction and supervision Exhibits CE-11A and CE-11B were prepared.¹ This affidavit authenticates Exhibits CE-11A and CE-11B, sets forth Mr. Della Rocca's qualifications, and explains the circumstances under which these exhibits were prepared.

¹ Mr. Della Rocca appeared as a witness in this proceeding on March 25, 1983.

Exhibit CE-11A

Exhibit CE-11A identifies each roadway section traveled by the Board during the April 13, 1983 tour of the EPZ and county EOC's. It also sets forth the range of anticipated evacuation volumes for the primary evacuation routes traveled, together with the average two-way daily volume of such routes, where available, from state and county sources.

Exhibit CE-11B

Exhibit CE-11B is a map delineating the roadways traveled by the Board on April 13, together with all other primary evacuation routes and the EPZ boundary.

Grounds for Admission

The annexed exhibits constitute the only record memorializing the route of the Board's tour of the plume exposure pathway EPZ on April 13, in which numerous parties, intervenors, and interested states also participated. Hence, these exhibits will not only be valuable to the Board and hearing participants, but also are important to ensuring a complete record.²

² Because the participants did not reach final agreement on the route of the tour until shortly before the tour date,
(footnote continued)

The exhibits are clearly reliable, since the Board and participants had these items in their possession during the tour, and could then or now independently verify their accuracy.³ The data underlying the evacuation volume statistics was provided to the hearing participants at licensees' document production on June 1, 1982.

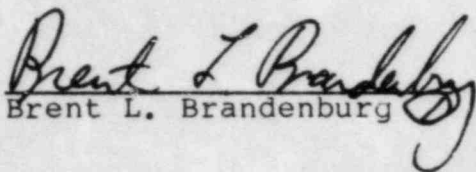
Copies of the annexed exhibits are being provided to all addressees on the official service list, and three copies will be provided to the reporter upon receipt into evidence.

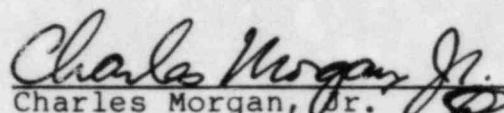
(footnote continued from previous page)

it was not possible for the licensees to distribute the exhibits or move them into evidence prior to the tour.

³ As Mr. Della Rocca points out at page 2 of his affidavit, Exhibit A contains two corrections to the material distributed on the April 13 tour.

Respectfully submitted,


Brent L. Brandenburg


Charles Morgan, Jr.
Paul F. Colarulli
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Dated: April 22, 1983

EXHIBIT CE-11