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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
MONROE

*82 DEC -6 AIO:12

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

SECRETARY
DOCKETING & SERVICE
BRANCH

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

November 30, 1982

PARENTS CONCERNED ABOUT INDIAN POINT
MOTION TO COMPEL DISCOVERY

On June 21, 1982, Parents Concerned About Indian Point submitted Interrogatories 1-11, concerning contention 6.2, to the licensees. On July 21, the licensees responded briefly by objecting to Parents' Interrogatories, saying that our questions about routine and unscheduled releases of radiation "seek to elicit information which by their nature can take place only during continuing operation" while "Question 6 addresses only the consequences of shutting down the Indian Point units."

Since Parents requested information on which to base a comparison of the risks of routine and unscheduled radiation releases at Indian Point (Commission Question 5, according to the revised contentions in the Commission Memorandum and Order of November 15, 1982) and an analysis of the environmental costs vs. benefits of a shut down of the Indian Point units (reformulated contention 6.2) Parents Concerned About Indian Point hereby moves for an order directing the licensees to answer Interrogatories 1-11 propounded by Parents.

Parents Concerned About Indian Point further moves that we be allowed to submit a document request to the NRC staff seeking reports of radioactive releases at selected power plants.

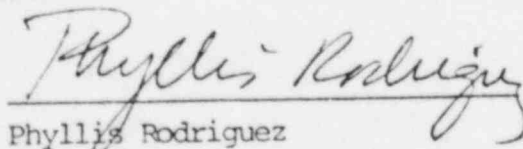
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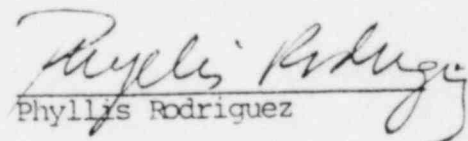
At this time, Parents requests the following documents from the NRC staff:

1. NUREG/CP 0021 Radiation Levels
2. NUREG -0713, Vol 1 and Vol 2, Occupational Radiation Exposure at Commercial Nuclear Power Reactors - 1979.
3. NUREG/CR-1788 Nuclear Power and Radiation in Perspective: Selections from Nuclear Safety.
4. NUREG/CR-1918 Dose-Rate Conversion Factors for External Exposure to Photons and Electrons.
5. NUREG/CR - 1955 and NUREG/CR - 1955 err A Generalized Age Dependent Lung Model with Applications to Radiation Standards.
6. NUREG/CR - 2227 Radioactive Materials Released from Nuclear Power Plants. Annual Report 1979.
7. ALL EARLIER ANNUAL REPORTS ISSUED BY THE FORMER ATOMIC ENERGY COMMISSION AND THE NUCLEAR REGULATORY COMMISSION ENTITLED "RADIOACTIVE MATERIALS RELEASED FROM NUCLEAR POWER PLANTS" OR ANY OTHER TITLE COMPILING AND SUMMARIZING RELEASES OF RADIOACTIVE MATERIALS IN AIRBORNE AND LIQUID EFFLUENTS FROM COMMERCIAL LIGHT WATER REACTORS DURING YEARS PREVIOUS TO 1979.*
8. NUREG/CR-0570 ADD Environmental Radiological Surveillance
9. NUREG/CR-2246 Radiation Dose Estimates and Hazard Evaluations for Airborne Radionuclides. Annual Progress Report, July 1, 1979-June 30, 1980.
10. NUREG/CR-2440 Transport of Low Specific Activity Radioactive Materials.
11. NUREG-0764 FC Toward a Safety Goal: Discussion of Preliminary Policy Considerations.
12. NUREG/CR-1496 Nuclear Power Plant Operating Experience, 1979. Annual Report.
- * 13. NUREG/CR-1497 Radioactive Materials Released from Nuclear Power Plants. Annual Report 1978.

Respectfully submitted,

I hereby certify that copies of of this Motion have been mailed to the attached Service List on this 29th day of November, 1982.


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Atomic Safety and Licensing Appeal
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