

DOCKETED
USNRC

'82 DEC -7 P4:34

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of)	
)	
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.)	Docket Nos.
(Indian Point, Unit No. 2))	50-247 SP
)	50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK)	
(Indian Point, Unit No. 3))	7 December 1982

UCS/NYPIRG SUPPLEMENTAL RESPONSE TO
NRC STAFF INTERROGATORIES ON
COMMISSION QUESTIONS ONE AND TWO

Pursuant to verbal agreement between UCS/NYPIRG and counsel for NRC Staff, UCS/NYPIRG hereby supplements its response to Interrogatory No. 1 on Commission Questions One and Two.

- 107. Letter dated 20 February 1980 from Milton S. Plesset, Chairman of ACRS, to Congressman Morris K. Udall.
- 108. Memo dated 1 April 1981 from Guy A. Arlotto to W. J. Dircks, Subject: "Completion of Degraded Core Cooling Steering Group Work:", plus attachments.
- 109. SECY-82-1A, Memo dated 16 July 1982 from William J. Dircks to NRC Commissioners, Subject: "Proposed Commission Policy Statement on Severe Accidents and Related Views on Nuclear Reactor Regulation", plus attachments.
- 110. SECY-82-203, Memo dated 19 May 1982 from William J. Dircks to NRC Commissioners, Subject: "'Nuclear Plant Severe Accident Research Plan', NUREG-0900, (DRAFT)", plus attachments.

DS03

111. SECY-82-203A, Memo dated 30 August 1982 from William J. Dircks to NRC Commissioners, Subject: "Revisions to 'Nuclear Plant Severe Accident Research Plan', NUREG-0900 (DRAFT)", plus attachments.
112. Memo dated 26 March 1982 from Stephen H. Hanauer to Harold R. Denton, Subject: "Preliminary Ranking of NRR Generic Safety Issues", plus attachments.
113. NUREG-0510, "Identification of Unresolved Safety Issues Relating to Nuclear Power Plants: Report to Congress", Office of Nuclear Reactor Regulation, U.S. NRC, January 1979.
114. NUREG-0705, "Identification of New Unresolved Safety Issues Relating to Nuclear Power Plants: Special Report to Congress", Office of Nuclear Reactor Regulation, U.S. NRC, March 1981.
115. NUREG-0410, "NRC Program for the Resolution of Generic Issues Related to Nuclear Power Plants: Report to Congress", Office of Nuclear Reactor Regulation, U.S. NRC, January 1978.
116. "Generic Issues Tracking System", quarterly reports by U.S. NRC.
117. NUREG-0606, "Aqua Book", quarterly report on status of Unresolved Safety Issues.
118. NUREG-0674, W. Floyd and D. Kers, "Security Personnel Training and Qualification Guide", U.S. NRC, May 1980.
119. Leonard R. Solon and Kenneth Rosenberg, "The Release of Radioiodines in a Nuclear Emergency", Bulletin of the Atomic Scientists, October 1981, pages 54-56.
120. CLI-80-40, Memorandum and Order in the Matter of FINAL RULE ON EMERGENCY PLANNING, PR-50 (44 FR 75167), 5 December 1980, plus attachments.
121. D.A. Towers, et. al., "Evaluation of the Prompt Alerting System for the Indian Point Nuclear Power Station: A Memorandum Report", Bolt, Beranek and Newman, Inc., submitted to Pacific Northwest Laboratories, 26 October 1981.
122. SAND77-1555, David C. Aldrich and David M. Ericson, Jr., "Public Protection Strategies in the Event of a Nuclear Reactor Accident: Multicompartment Ventilation Model for Shelters", Sandia Laboratories, January 1978.

123. SAND77-1725, David C. Aldrich, et. al., "Public Protection Strategies for Potential Nuclear Reactor Accidents: Sheltering Concepts with Existing Public and Private Structures", Sandia Laboratories, February 1978.
124. EPA-520/1-78-001A, George H. Anno and Michael A. Dore, "The Effectiveness of Sheltering as a Protective Action Against Nuclear Accidents Involving Gaseous Releases", U.S. Environmental Protection Agency, April 1978.
125. EPA-520/1-78-001B, George H. Anno and Michael A. Dore, "Evacuation and Sheltering as Protective Actions Against Nuclear Accidents Involving Gaseous Releases", U.S. Environmental Protection Agency, April 1978, Revised August 1978.
126. NUREG/CP-0032, BNL-NUREG-51552, S. SethuRaman, et. al., "Proceedings of the Workshop on Meteorological Aspects of Emergency Response Plans for Nuclear Power Plants", Brookhaven National Laboratory, August 1982.
127. NUREG/CR-1582, Vol. 2, D.L. Bernreuter, Project Manager, "Seismic Hazard Analysis: A Methodology for the Eastern United States", TERA Corporation, August 1980.
128. NUREG/CR-1582, Vol. 3, D.L. Bernreuter, Project Manager, "Seismic Hazard Analysis: Solicitation of Expert Opinion", TERA Corporation, August 1980.
129. NUREG-0588, A.J. Szukiewicz, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment: Resolution of Generic Technical activity A-24", U.S. NRC, December 1979.
130. NUREG/CR-0388, SAND78-0269, David M. Ericson, Jr., "Accident Descriptions for Emergency Response Exercise Scenarios", Sandia Laboratories, November 1978.
131. NUREG-0396, EPA-520/1-78-016, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants", Task Force on Emergency Planning, U.S. NRC and U.S. EPA, December 1978.
132. NUREG-0654, FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of

Nuclear Power Plants", U.S. NRC and FEMA, November 1980.

133. NUREG-0909, "NRC Report on the January 25, 1982 Steam Generator Tube Rupture at R.E. Ginna Nuclear Power Plant", U.S. NRC, April 1982.
134. NUREG-0737, "Clarification of TMI Action Plan Requirements", U.S. NRC, November 1980.
135. NUREG-0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident", U.S. NRC, May 1980.
136. NUREG-0773, Draft, "The Development of Severe Accident Source Terms", U.S. NRC, October 1982.
137. NUREG/CR-2629, ORNL/TM-8274, S.J. Niemczyk and L.M. McDowell-Boyer, "Interim Source Term Assumptions for Emergency Planning and Equipment Qualification", Oak Ridge National Laboratory, June 1982.
138. P.E. McGrath, et. al., "The Reactor Safety Study (WASH-1400) and its Implications for Radiological Emergency Response Planning", Sandia Laboratories, in IAEA-SM-215/23, "International Symposium on Handling of Radiation Accidents", 28 February 1977, Vienna, Austria, pages 165-179.
139. NUREG-0478, D.F. Bunch, "Metropolitan Siting: A Historical Perspective", U.S. NRC, October 1978.
140. Memo dated 26 September 1979 from R. Wayne Houston to Daniel R. Muller, Subject: "NUREG 625 Recommendation No. 2", and attachments.
141. EPA-520/1-75-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", September 1975, revised June 1980, U.S. EPA.
142. Committee on the Biological Effects of Ionizing Radiation, "The Effects on Populations of Exposure to Low Levels of Ionizing Radiation: 1980", National Research Council/National Academy of Sciences, 1980 (BEIR III).
143. EPA-520/6-74-002, Joseph M. Hans, Jr., and Thomas C. Sell, "Evacuation Risks - An Evaluation", U.S. EPA, June 1974.
144. NUREG/CR-1151, SAND79-2079, A.F. Cohen and B.L. Cohen, "Infiltration of Particulate Matter into Buildings", Edited by D.C. Aldrich, Sandia Laboratories, November 1979.

145. NCRP Report No. 55, "Protection of the Thyroid Gland in the Event of Releases of Radioiodine", National Council on Radiation Protection and Measurements, 1 August 1977, reprinted 1 October 1979.
146. NUREG/CR-1433, SAND80-0981, D.C. Aldrich and R.M. Blond, "Examination of the Use of Potassium Iodide (KI) as an Emergency Protective Measure for Nuclear Reactor Accidents", Sandia Laboratories, March 1980.
147. NUREG/CR-2644, ENICO-1110, W.J. Maeck, et. al., "An Assessment of Offsite, Real-Time Dose Measurement Systems for Emergency Situations", Exxon Nuclear Idaho Company, Inc., April 1982.
148. Consolidated Edison Company of New York, Inc., "Updated Final Facility Description and Safety Analysis Report", July 1982.
149. Memo dated 27 April 1982 from Thomas M. Novak to Atomic Safety and Licensing Board for Indian Point, Subject: "Board Notification - Indian Point Special Investigative Proceeding (BN 82-35)", and attachments.
150. Letter dated 22 January 1982 from Robert A. Bari to Dr. Ashok Thadani, Subject: "Memorandum: 'BNL Peer Review of the Zion Probabilistic Safety Study', A.J. Buslik to R.A. Bari, 1/18/82 (Enclosure 1), and Memorandum: 'On the Two-Stage Bayesian Procedure for Determining Plant-Specific Frequencies for Initiating Events', I.A. Papazoglou to R.A. Bari, 1/19/82 (Enclosure 2)", and attachments.
151. Sandia National Laboratories, "Letter Report on Review and Evaluation of the Indian Point Probabilistic Safety Study", DRAFT, August 25, 1982, and attachments.
152. Letter dated 22 March 1982 from P.R. Davis to J. Michael Griesmeyer.
153. Memo dated 9 February 1982 from R.G. Easterling to J.W. Hickman, Subject: "Comments on the Zion Interfacing LOCA Analysis".
154. Jack W. Hickman, "Review of the Zion Probabilistic Safety Study Systems Analysis", Sandia National Laboratories, 15 February 1982.
155. Letter dated 15 January 1982 from P.R. Davis to J. Michael Griesmeyer, Subject: "First Round Review of Zion PRA".

156. Memo dated 15 May 1980 from A.R. Marchese to T.P. Speis, Subject: "Zion/Indian Point Severe Accident Mitigation Feature Study".
157. NUREG-8-0818, "Emergency Action Levels for Light Water Reactors", Division of Emergency Preparedness, Office of Inspection and Enforcement, U.S. NRC, October 1981.
158. G.W. Parry, et. al., "Technical Note: Statistical Tolerance in Safety Analysis", Nuclear Safety, Vol. 22, No. 4, July-August 1981, pages 459-463.
159. Robert G. Easterling, "Letter to the Editor: Bayesianism", and response by Gareth W. Parry and Paul W. Winter, Nuclear Safety, Vol. 22, No. 4, July-August 1981, pages 465-466.
160. A.H. Hadjian and W.D. Iwan, "Some Issues in the Seismic Design of Nuclear Power-Plant Facilities", Nuclear Safety, Vol. 21, No. 5, September-October 1980, pages 577-581.
161. NUREG-0872, R.DiSalvo, et. al., "A Feasibility Study of Using Licensee Event Reports for a Statistical Assessment of the Effect of Overtime and Shift Work on Operator Error", U.S. NRC, July 1982.
162. NUREG-0677, M.P. Rubin, "The Probability of Intersystem LOCA: Impact Due to Leak Testing and Operational Changes", U.S. NRC, May 1980.
163. F. Coffman, "Initial Guidance for the Performance of Systems Interactions Analyses at Selected LWRS (Guidance for Interim Use and Comment)", DRAFT, U.S. NRC, 7 January 1982.
164. Letter dated 7 May 1980 from Milton S. Plesset to Victor Gilinsky, and attachments.
165. Letter dated 12 January 1981 from P.R. Davis to Dr. Jeremiah J. Ray, and attachments.
166. Letter dated 30 December 1980 from E.P. Epler to J. Ray.
167. Memo dated 20 October 1981 from Raymond F. Fraley to William J. Dircks, Subject: "Bolt Failures in Nuclear Power Plants".
168. Memo dated 3 March 1982 from R. Savio to ACRS Members, Subject: "Possible System Interaction Study Topics", and attachments.

169. Letter dated 4 May 1982 from Wm. B. Cottrell to Fred Manning, and attachments.
170. G.W. Parry and P.W. Winter, "Characterization and Evaluation of Uncertainty in Probabilistic Risk Analysis", Nuclear Safety, Vol. 22, No. 1, January-February 1981, pages 28-42.
171. R.A. Haarman and J.M. Boudreau, "Reactor Sabotage Vulnerability and Vital Equipment Identification", Los Alamos National Laboratory, paper presented at Tenth Water Reactor Safety Research Information Meeting, October 12-15, 1982, Gaithersburg, MD.
172. SAND82-2141C, A.S. Benjamin, et. al., "Severe Accident Risk Reduction Program", Sandia National Laboratories, paper presented at the Tenth Water Reactor Safety Research Information Meeting, October 12-15, 1982, Gaithersburg, MD.
173. SAND82-2120C, F.E. Haskin, et. al., "Containment Management Study for Severe PWR Accidents", Sandia National Laboratories, paper presented at the Tenth Water Reactor Safety Research Information Meeting, October 12-15, 1982, Gaithersburg, MD.
174. R. Philip Hammond and James L. Dooley, "Summary of Retrofitting Nuclear Plants for the Mitigation of Core Melt Effects", R & D Associates, paper presented at the Tenth Water Reactor Safety Research Information Meeting, October 12-15, 1982, Gaithersburg, MD.
175. Letter dated 15 September 1982 from P. Shewman to Nunzio J. Palladino, Subject: "ACRS Comments on the NRC Staff Questions to the Commission Concerning the Policy Statement on Safety Goals for Nuclear Power Plants", and attachments.
176. Letter dated 15 September 1982 from P. Shewman to Nunzio J. Palladino, Subject: "ACRS Report on the Draft Action Plan for Implementing the Commission's Proposed Safety Goals for Nuclear Power Plants", and attachments.
177. Letter dated 14 September 1982 from P. Shewman to Nunzio J. Palladino, Subject: "ACRS Report on SECY-82-1A: Proposed Commission Policy Statement on Severe Accidents and Related Views on Nuclear Reactor Regulation", and attachments.
178. Letter dated 15 September 1981 from J. Carson Mark to Nunzio J. Palladino, Subject: "Report on Proposed

Rule on Reactor Site Criteria", and attachments.

179. Letter dated 14 October 1982 from P. Shewman to Nunzio J. Palladino, Subject: "ACRS Report on Draft NRC Staff Evaluation of Pressurized Thermal Shock Dated September 13, 1982", and attachments.
180. Memo dated 14 March 1980 from Robert M. Bernero and Frank H. Rowsome to Harold R. Denton and Carl Michelson, Subject: "Single Failure Potentially Leading to Core Damage".
181. Memo dated 12 January 1982 from Carlyle Michelson to Robert F. Burnett, Subject: "Methodology for Vital Area Determination".
182. R.J. Beyer and J.W. Riddington, "Valve Failure Problems in LWR Power Plants", Nuclear Safety, Vol. 22, No. 2, March-April 1981, pages 229-235.
183. Letter dated 26 July 1982 from J.M. Felton to Richard A. Udell, and attachments.
184. Letter dated 18 August 1982 from P. Shewman to Nunzio J. Palladino, Subject: "ACRS Comments on 'Nuclear Plant Severe Accident Research Plan,' NUREG-0900 (DRAFT)".
185. Memo dated 21 July 1982 from Thomas M. Novak to Atomic Safety and Licensing Appeal Board for Three Mile Island-1, Subject: "Board Notification (BN-82-75) - Three Mile Island-1".
186. DOE-EV-0109, P.W. House, et. al., "Comparing Energy Technology Alternatives from an Environmental Perspective", U.S. Department of Energy, February 1981.
187. Generic Letter 81-28, dated 31 July 1981, from Darrell G. Eisenhut to All Licensees of Operating Plants and Holders of Construction Permits, Subject: "Steam Generator Overfill", and attachments.
188. SECY-80-325A, Memo dated 7 November 1980 from William J. Dircks to NRC Commissioners, Subject: "Inclusion of Steam Generator Transients as an Unresolved Safety Issue", and attachments.
189. NUREG-0144, SAND76-0637, "Summary Report on Workshop on Sabotage Protection in Nuclear Power Plant Design", Sandia Laboratories, February 1977.
190. NUREG/CR-0463, SAND78-1994, David M. Ericson, Jr., and G. Bruce Varnado, "Program Plan: Nuclear Power

Plant Design Concepts for Sabotage Protection", Sandia Laboratories, December 1978.

191. NUREG/CR-0181, A. Fainberg and A.M. Bieber, Jr., "Barrier Penetration Database", Brookhaven National Laboratory, July 1978.
192. NUREG/CR-2546, SAND82-0319, Harold A. Bennett, "Reactor Safeguards Against Insider Sabotage", Sandia National Laboratories, March 1982.
193. NUREG-0184, SAND77-0082, Harold A. Bennett, "User's Guide for Evaluating Physical Security Capabilities of Nuclear Facilities by the EASI Method", Sandia Laboratories, June 1977.
194. SAND77-0777, "Barrier Technology Handbook", Sandia Laboratories, April 1978.
195. J.B. Stewart, Jr., et. al., "Generic Adversary Characteristics Report", UNCLASSIFIED, March 10, 1979, U.S. NRC.
196. NUREG/CR-1226, SAND80-0058, Bernie L. Hulme and Christine A. Morgan, "POST: A Subroutine for Path Ordering of Sabotage Targets", Sandia National Laboratories, February 1980.
197. NUREG/CR-2585, SAND82-7011, Peter Lobner, "Nuclear Power Plant Damage Control Measures and Design Changes for Sabotage Protection", Sandia National Laboratories, May 1982.
198. "View Graphs from Zion/Indian Point Technology Exchange Meetings #1 and #2, May 7-8 1980, Chicago, Illinois, and attachments.
199. Memo dated 7 July 1980 from S.L. Israel to M.L. Ernst, Subject: "Meeting Summary - Zion/Indian Point Risk Study Presentation", and attachments.
200. James F. Meyer, "Summary of Technology-Exchange Meeting 5 Held on June 17, 1980 with Consolidated Edison Company of New York (CON. ED), Power Authority of the State of New York (PASNY), and Commonwealth Edison Company (CECo) to Discuss Containment Structural Response for Indian Point Units 2 and 3 and Zion Units 1 & 2", 31 July 1980, U.S. NRC, and attachments (view graphs).
201. John K. Long, "Summary of Technical Presentation Meeting on June 18, 1980, with Consolidated Edison Company of New York (CON ED), Power Authority of the State of New York (PASNY), and Commonwealth Edison

Company (CECo) to Present Their Current Views on Degraded Cooling/Core Melt Accident Sequences", U.S. NRC, 31 July 1980, and attachments.

202. James F. Meyer, "Summary of Technology-Exchange Meetings 1 and 2 Held on May 7-8, 1980, with Consolidated Edison Company of New York (Con Ed), Power Authority of the State of New York (PASNY), and Commonwealth Edison Company (CECo) to Discuss Core Melt Accident Sequences and Associated Phenomenology for Indian Point Units 2 and 3 and Zion Units 1 and 2", 9 July 1980, U.S. NRC and attachments.
203. Report No. 35A96, Offshore Power Systems, "An Evaluation of the Residual Risk from the Indian Point Nuclear Power Plants", May 1980.
204. BNL-NUREG-28750, A.J. Buslik and R.A. Bari, "A Critique of the Offshore Power Systems Risk Study for the Zion Nuclear Power Plant", Informal Report, Brookhaven National Laboratory, December 1980.
205. Letter dated 10 April 1980 from A. Schwencer to D.L. Peoples, and attachments.
206. Letter dated 25 February 1980 from William J. Cahill, James F. Davis, and D.L. Peoples to Harold R. Denton, Subject: "Indian Point/Zion Near Site Study Report", and attachments.
207. John K. Long, "Summary of Technology Exchange Meeting 3 Held on May 20, 1980, in Bethesda, with Consolidated Edison Company of New York (ConEd), Power Authority of the State of New York (PASNY), and Commonwealth Edison Company (CECo) to Discuss Accident Mitigation Features for Indian Point Units 2 and 3 and Zion Units 1 and 2", 12 June 1980, U.S. NRC, and attachments.
208. L.N. Olshan, "Summary of Meeting Held on February 20, 1980, with Consolidated Edison Company of New York (ConEd), Power Authority of the State of New York (PASNY), and Commonwealth Edison Company (CECo) to Discuss Accident Mitigation Features for Indian Point Units 2 and 3 and Zion Units 1 and 2", 21 February 1980, U.S. NRC and attachments.
209. Letter dated 13 November 1980 from Peter Zarakas to Thomas M. Novak, Subject: "Information Related to Backfitting of Severe Accident Mitigation Features".
210. James F. Meyer and Andrew Marchese, "Summary of Technology-Exchange Meeting 4 Held on June 3, 1980,

with Consolidated Edison Company of New York (ConEd), Power Authority of the State of New York (PASNY), and Commonwealth Edison Company (CECo) to Discuss Filtered Vented Containment Systems and Core Retention Devices", 21 July 1980, U.S. NRC, and attachments.

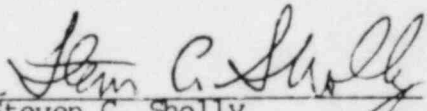
211. IE Information Notice No. 82-07, "Inadequate Security Screening Programs", 16 March 1982.
212. IE Information Notice No. 82-37, "Cracking in the Upper Shell to Transition Cone Girth Weld of a Steam Generator at an Operating Pressurized Water Reactor", 16 September 1982.
213. IE Information Notice No. 79-12A, "Attempted Damage to New Fuel Assemblies", 9 November 1979.
214. IE Information Notice No. 79-26, "Breach of Containment Integrity", 5 November 1979.
215. Ron Newhouser, Department of Justice, "Comments on the Value and Effectiveness of a Pat-Down Search in the Detection of Concealed Explosives", 23 February 1978.
216. SECY-76-242C, Memo dated 7 October 1976 from Robert B. Minogue to NRC Commissioners, Subject: "Physical Protection of Nuclear Power Reactors Against Industrial Sabotage; Amendments to 10 CFR Parts 50 and 73", and enclosures.
217. IE Information Notice No. 80-18, "Possible Weapons Smuggling Pouch", 5 May 1980.
218. SECY-77-28, Memo dated 19 January 1977 from Robert B. Minogue to NRC Commissioners, Subject: "Physical Protection of Nuclear Power Reactors Against Industrial Sabotage", and attachments.
219. SECY-76-242B, Memo dated 8 September 1976 from Ben C. Rusche to NRC Commissioners, Subject: "Physical Protection Requirements for Nuclear Reactors", and attachments.
220. SAND82-2098C, David M. Ericson, Jr., and G. Bruce Varnado, "Summary Description of Nuclear Power Plant Design Concepts for Sabotage Protection", preprint summary of presentation at Tenth Water Reactor Safety Research Information Meeting, October 12-15, 1982, Gaithersburg, MD.

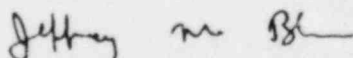
221. MTR-7022, S. Burnham, et. al., "The Threat to Licensed Nuclear Facilities", Mitre Corporation, September 1975.
222. Memo dated 6 November 1981 from William J. Dircks to Commissioner Bradford, Subject: "Staff Practice for Permitting Continued Operation Following an Indication of Sabotage", and attachments.
223. Letter dated 13 November 1981 from Fred C. Finlayson to Brian Grimes, plus attachments.
224. NUREG/CR-1345, SAND80-0477, David M. Ericson, Jr., and G. Bruce Varnado, "Nuclear Power Plant Design Concepts for Sabotage Protection", Sandia National Laboratories, January 1981.

UCS/NYPIRG is continuing to review public docket files and organizational files for documents which we may use as described in the Staff's interrogatory. We anticipate using NRC Staff and licensee-generated documents regarding the compliance of Indian Point Units 2 and 3 with TMI Action Plan requirements, status of safety-related and safety-grade equipment with regard to environmental qualification, and the status of compliance with fire protection requirements. Should we locate additional documents subject to this interrogatory, this response will be supplemented.

DATED: 7 December 1982

RESPECTFULLY SUBMITTED,


Steven C. Sholly
Union of Concerned Scientists

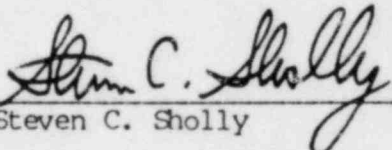

Jeffrey M. Blum, Esq.
Counsel for UCS

VERIFICATION

DISTRICT OF COLUMBIA) :S.:

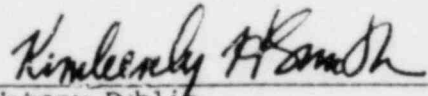
I, STEVEN C. SHOLLY, being duly sworn, depose and say:

That I am Technical Research Assistant for the Union of Concerned Scientists, a joint intervenor with the New York Public Interest Research Group, Inc., in the Indian Point Special Investigation being conducted for the U.S. Nuclear Regulatory Commission by the Atomic Safety and Licensing Board; that I am authorized to make this verification on behalf of UCS/NYPIRG; and that the foregoing answers to interrogatories were prepared under my direction and supervision and are true and correct to the best of my knowledge, information, and belief.



Steven C. Sholly

Sworn to before me this
7th day of December, 1982



Notary Public

My Commission expires
October 31, 1986

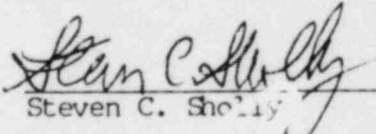
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of)	
)	
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.)	Docket Nos.
(Indian Point, Unit No. 2))	50-247 SP
)	50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK)	
(Indian Point, Unit No. 3))	7 December 1982
)	

CERTIFICATE OF SERVICE

I hereby certify that single copies of "UCS/NYPIRG SUPPLEMENTAL RESPONSE TO NRC STAFF INTERROGATORIES ON COMMISSION QUESTIONS ONE AND TWO" were served upon the following by deposit in the U.S. mail, first class postage prepaid, or as indicated by a single asterisk by hand delivery, this seventh day of December 1982.


Steven C. Sholly

*Nunzio Palladino, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Victor Gilinsky, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*John Ahearne, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Thomas Roberts, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*James Asselstine, Commissioner
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

* Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
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

* Ruthanne G. Miller, Esq.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

* Janice E. Moore, Esq.
Donald F. Hassell, Esq.
Henry J. McGurran, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

* 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

Brent L. Brandenburg, Esq.
Assistant General Counsel
Consolidated Edison Company of
New York, Inc.
4 Irving Place
New York, NY 10003

Paul F. Colarulli, Esq.
Joseph J. Levin, Jr., Esq.
Pamela S. Horowitz, Esq.
Charles Morgan, Jr., Esq.
Morgan Associates, Chartered
1899 L Street, N.W.
Washington, D.C. 20036

Charles M. Pratt, Esq.
Stephen L. Baum, Esq.
Power Authority of the State
of New York
10 Columbus Circle
New York, NY 10019

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

Jonathan D. Feinberg
New York State Public Service
Commission
Three Empire State Plaza
Albany, NY 12223

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

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

Marc L. Parris, Esq.
Eric Thorsen, Esq.
County Attorney
County of Rockland
11 New Hempstead Road
New City, NY 10956

Honorable Ruth Messinger
Member of the Council of the
City of New York
District #4
City Hall
New York, NY 10007

Alfred B. Del Bello
Westchester County Executive
Laurie Vetere, Esq.
148 Martine Avenue
White Plains, NY 10601

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

Donald Davidoff, Director
New York State Radiological
Emergency Preparedness Group
Empire State Plaza
Tower Building, Room 1750
Albany, NY 12237

David H. Pikus, Esq.
Richard F. Czaja, Esq.
Shea and Gould
330 Madison Avenue
New York, NY 10017

Pat Rosner, Spokesperson
Parents Concerned About Indian Point
P.O. Box 125
Croton-on-Hudson, NY 10520

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

Judith Kessler, Coordinator
Rockland Citizens for Safe Energy
300 New Hempstead Road
New City, NY 10956

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

David B. Duboff
Westchester People's Action
Coalition, Inc.
255 Grove Street
White Plains, NY 10601

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

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

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

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

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

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

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

Melvin Goldberg, Staff Attorney
Joan Holt, Project Director
New York Public Interest
Research Group, Inc.
9 Murray Street
New York, NY 10007

Craig Kaplan, Esq.
National Emergency Civil
Liberties Committee
175 Fifth Avenue, Suite 712
New York, NY 10010

Ms. Amanda Potterfield, Esq.
Johnston & George, Attys-at-Law
528 Iowa Avenue
Iowa City, IA 52240

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

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

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

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

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