UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION DOCKETED

ATOMIC SAFETY AND LICENSING BOARD '82 DEC 20 P3:53

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

In the Matter of Docket Nos. 50-247-SP 50-286-SP CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point, Unit No. 2) POWER AUTHOROTY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3) December 17, 1982

> LICENSEES' RESPONSE TO PARENTS CONCERNED ABOUT INDIAN POINT MOTION TO COMPEL DISCOVERY

Pursuant to 10 C.F.R. §§ 2.740b and 21741 (1992), the Consolidated Edison Company of New York, Inc. and the Power Authority of the State of New York, licensees, hereby Submit these responses to Parents Concerned About Indian Point interrogatories and document requests concerning the Nuclear Regulatory Commission's Question 6.

ATTORNEYS FILING THIS DOCUMENT:

Charles M. Pratt

Brent L. Brandenburg POWER AUTHORITY OF THE CONSOLIDATED EDISON COMPANY STATE OF NEW YORK OF NEW YORK, INC.

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INTERROGATORY NO. 1

Does the operation of Indian Point Units 2 and 3 require venting steam and/or other gases containing radioactive isotopes or radionuclides?

RESPONSE

Yes.

INTERROGATORY NO. 2

If yes, are some of the ventings planned or scheduled? RESPONSE

Yes, the ventings are planned.

INTERROGATORY NO. 3

If some of the ventings are scheduled, how often do the planned ventings occur? Give an average using the appropriate time reference.

RESPONSE

Ventings are planned but are not scheduled for a specific time of day. As part of normal operation of Indian Point 3 Nuclear Power Plant venting of the containment is performed approximately once every two days. On occasion containment venting of Indian Point 3 has been performed approximately once a day for a period of time. The Indian Point 2 containment is vented approximately once a day as part of normal operation.

In addition, during normal operation there are a few other monitored release pathways which may occasionally contain small quantities of radioactive steam and/or gas.

These releases are automatically terminated if the radioactivity reaches a pre-determined level.

INTERROGATORY NO. 4

If some ventings are scheduled, how long in advance are the ventings scheduled?

RESPONSE

As stated above, ventings are planned but not scheduled for a specific time of day. When the decision is made to vent the containments, a multi-step process is followed before venting occurs. There is no standard time between the decision to vent and the time that ventings occur. Control of ventings from the turbine building is automatic as decribed above.

INTERROGATORY NO. 5

determine the schedule of venting? In answering, please identify and refer to any and all current radioactive release policies.

RESPONSE

See Responses to Interrogatories 3 and 4 above. The Power Authority's radioactive release policy is contained in Administrative Procedure, AP-11, Rev. 5. Con Edison's radioactive release policy is contained in Station Administrative Order 107. See response to Interrogatory 11, (Reference I).

INTERROGATORY NO. 6

Are any records kept of the scheduled venting?

RESPONSE

Records are kept of planned venting.

INTERROGATORY NO. 6a(1)

If yes, do records include an account of the nature and amount of radioactive material released?

RESPONSE

Yes.

INTERROGATORY No. 6a(2)

The level of radioactivity for each release?

RESPONSE

Yes.

INTERROGATORY NO. 6a(3)

The proportion of radioactive material to the total

release?

RESPONSE

No.

INTERROGATORY NO.6a(4)

The date, and time of day of each release.

RESPONSE

Yes.

INTERROGATORY NO. 6a(5)

The wind direction for each release?

RESPONSE

Yes.

INTERROGATORY NO. 6a(6)

The conditions for each release?

RESPONSE

Yes.

INTERROGATORY NO. 6a(7)

The height above sea level at which each release was made?

RESPONSE

No.

INTERROGATORY NO. 6a(8)

Please include a sample record form.

RESPONSE

See form attached.

INTERROGATORY NO. 7

If the records are kept, please provide us with a record of scheduled ventings from the beginning of operation of Indian Point Units 2 and 3. If too voluminous, please give a record for the month of August for each year of operation for each plant. If too voluminous, give a list of dates of scheduled releases from the beginning of operation of each plant.

RESPONSE

The records for such releases are voluminous. Summaries of all releases are provided to the NRC in the Semi-Annual Effluent and Waste Disposal Reports for each plant which are available in the Public Document Room of the NRC. See response to Interrogatory 11, (Reference 2).

INTERROGATORY NO. 8

Does the operation of Indian Point 2 and 3 require venting steam and/or other gases containing radioactive isotopes and radionuclides other than on a scheduled basis?

RESPONSE

Except as described above, no other venting is required. INTERROGATORY NO. 8a

If yes, how often do the unscheduled ventings occur?

RESPONSE

See Response to Interrogatory Number 3,

INTERROGATORY NO. 9

Are records kept of the unscheduled ventings?
RESPONSE

See Response to Interrogatories 3 and 6.

INTERROGATORY NO. 9a

If yes, do the records include the items listed in question 6a? Please include a sample record form.
RESPONSE

Yes, see Response to Interrogatories 3 and 6a.

INTERROGATORY NO. 10

If records are kept, please provide us with a record of unscheduled ventings from the beginning of operation of Indian Point Units 2 and 3. If too voluminous, please give a record of unscheduled releases for the month of August for each plant for each year of operation.

RESPONSE

See Response to Interrogatories 3 and 7.

INTERROGATORY NO. 11

Please identify any documents referred to in your answer by full name and date.

RESPONSE

Con Edison Reference 1

Nuclear Power
Indian Point Station
Station Administrative Order No. 107, Rev. 8
"Radioactive Waste Releases"
March 31, 1982

Power Authority Reference 1

Indian Point No. 3 Nuclear Power Plant AP-11, Rev. 5 Radioactive Waste Release Permits March 26, 1982

Con Edison Reference 2

"Semi-Annual Effluent and Waste Disposal Report" for Indian Point Unit 2.

Power Authority Reference 2

"Semi-Annual Report of Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents for Indian Point 3."

Brent L. Brandenburg

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Respectfully submitted,

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Dated: December 17, 1982

VERIFICATION

STATE OF NEW YORK)

COUNTY OF NEW YORK)

HERSCHEL SPECTER, being duly sworn, deposes and says:

That he is the Project Manager - Indian Poir* Hearings for the Power Authority of New York State, licensee of Indian Point Nuclear Generating Station, Unit No. 3; that he is authorized to make this verification of behalf of said corporation; and that the foregoing answers to interrogatories were prepared under his direction and supervision and are true and correct to the best of his knowledge, information and belief.

Berselel Specter

Sworn to before me this

day of

1982

MARYANN M. FALLS

Quelified in West again to the Communion Exercise States and 1944

VERIFICATION

STATE OF NEW YORK) : SS.:
COUNTY OF NEW YORK)

I, RICHARD P. REMSHAW, being duly sworn, depose and say:

That I am the Manager, Indian Point Hearings for Consolidated Edison Company of New York, Inc., licensee of the Indian Point Nuclear Generating Station, Unit No. 2; that I am authorized to make this verification on behalf of said corporation; 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.

RICHARD P. REMSHAW

Sworn to before me this 17th day of December, 1982.

Notary Public

Notary 1.1. Storm of New York

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POWER AUTHORITY OF THE STATE OF NEW YORK INDIAN POINT NO. 3 NUCLEAR POWER PLANT

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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

: Docket Nos.

CONSOLIDATED EDISION COMPANY OF NEW YORK, : 50-247 SP

INC. (Indian Point, Unit No. 2)

50-286 SP

POWER AUTHORITY OF THE STATE OF NEW YORK : (Indian Point, Unit No. 3)

December 17, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of LICENSEES' RESPONSE TO PARENTS CONCERNED ABOUT INDIAN POINT MOTION TO COMPEL DISCOVERY in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 17th day of December, 1982

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