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March 24, 1983

HAND DELIVER

Honorable James P. Gleason
Chairman
Honorable Frederick J. Shon
Honorable Oscar H. Paris
Administrative Law Judges
County Courthouse
White Plains, NY 10601

Re: In the Matter of Consolidated Edison
Company of New York, Inc. (Indian
Point, Unit No. 2), Power Authority
of the State of New York (Indian
Point, Unit No. 3): Docket Nos.
50-247 SP and 50-286 SP

Dear Administrative Law Judges:

I enclose a copy of the October 1982 Energy Systems
Research Group, Inc. (ESRG) study together with a copy of
the ESRG study received by us in March this year. I am
forwarding this study to you in further support of
Licensees' motion to impose sanctions.

The length of the document, the breadth of the
study's scope, the importance of it to Intervenor and
the shortness of time for review and analysis of this
study prior to the time for cross-examination make the
non-production of the ESRG study prejudicial to Licensees.
It will not be possible to conduct as substantial an
investigation of the report as would have otherwise been
done. Such investigation is particularly important in
cases involving the generalized, vague assertions which
underly ESRG's study.

Moreover, the March 1983 submission to Licensees
is incomplete on its face. On page 21 of the ESRG study
there is a reference to "Appendix F". Neither ESRG nor
Greater New York Council on Energy (GNCE) has provided

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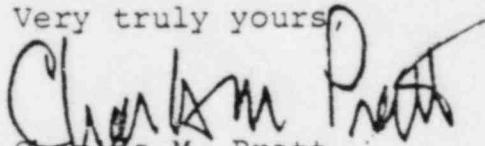
Honorable James P. Gleason
Chairman
Honorable Frederick J. Shon
Honorable Oscar H. Paris
March 24, 1983
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Appendix F to Licensees, nor have Licensees been able to obtain it otherwise.

Because of what appears to be clear evidence of the non-production of a material report to Licensees and the prejudice caused to Licensees' preparation for trial thereby, Licensees submit that this is an appropriate case for the imposition of sanctions against GNYCE and its consultants.

Licensees continue to request the right to conduct discovery of GNYCE and ESG as to the circumstances of the non-production.

Very truly yours,



Charles M. Pratt
Assistant General Counsel

CMP/bb

cc: Dean Corren: By Hand w/o enc.
Service List w/o enc.