RAS 2127

August 21, 2000

'00 AUG 28 P4:53

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Commission

In the Matter of	)	
	)	
POWER AUTHORITY OF THE STATE OF NEW YORK	)	Docket No. 50-286-LT
and	)	License No. DPR-64
ENTERGY NUCLEAR INDIAN POINT 3, LLC and ENTERGY NUCLEAR OPERATIONS, INC.	)	
	)	
(Indian Point Nuclear Generating Unit No. 3)	)	

TOWN OF CORTLANDT AND HENDRICK HUDSON CENTRAL SCHOOL DISTRICT'S REPLY TO APPLICANTS' ANSWER OPPOSING HEARING AND INTERVENTION REQUEST.

By Petition dated July 18, 2000, and Supplemental Filing of July 31, 2000, the Town of Cortlandt, New York and the Hendrick Hudson Central School District ("Petitioners") requested leave to intervene in the above referenced proceeding, and requested that the Commission conduct a hearing with respect to the proposed transfer and amendment of the operating license for the Indian Point No. 3 nuclear power plant ("IP3").

Other requests for intervention and/or hearings have been filed by Citizens Awareness Network, Putnam County, Westchester County, and Local 1-2, Utilities Workers Union of America. Petitioners, however, are the only entities (besides Westchester County), seeking intervention that are the host communities of the IP3 facility. As such, their interests are unique and intervention is warranted. Petitioners'

Template=SECY-037

SECY-02

interests are highlighted by the fact that IP3 is just one of three nuclear facilities located in their community. The prospective transfer of the IP2 and IP1 facilities will exacerbate both the consequential and direct impacts of any transfer of IP3.

By Answer dated August 14, 2000, Entergy Nuclear Indian Point 3, LLC ("ENIP"), Entergy Nuclear Operations, Inc. ("ENO"), and the Power Authority of the State of New York (the "Authority") (collectively the "Applicants") opposed Petitioners' requests to intervene and for a hearing. The Applicants maintain that the Petition is untimely, Petitioners lack standing, and that they have failed to raise any admissible issues with respect to the transfer proceeding.

Petitioners hereby respond to these arguments, and reiterate their request for a hearing with respect to the application.

PETITIONERS' INITIAL FILING

As discussed at length in Petitioners' initial filings, there are a number of issues of great concern with respect to the proposed transfer, especially with respect to the ability of the proposed transferees to fulfill their financial commitments to: 1) greenfield and decommission the site, and 2) provide adequate security to protect the public in the event of an accident or default with respect to the operations at either of the two nuclear facilities, IP3 in Westchester County or the James A. Fitzpatrick facility ("JAF") in Oswego County, New York.

In addition, the proposed transfer will have significant impacts upon emergency response plans, and upon the storage of spent nuclear fuel on the site of the Indian Point

facility. As discussed below, Petitioners raise issues that are "admissible" and constitute grounds for the Commission to conduct a hearing.

STANDARD FOR REVIEW OF APPLICATION

A license for a "production facility", such as the IP3 facility, cannot be transferred without the express consent of the Commission (10 C.F.R. 50.80(a)). The Commission's consent can be given only if the Commission determines "(1) that the proposed transferee is qualified to be the holder of the license; and (2) that transfer of the license is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto" (10 C.F.R. 50.80(c)).

10 C.F.R. 50.80(b) requires that an application for the transfer of a license include the same information "with respect to the identity and technical and financial qualifications of the proposed transferee" which would be required for an initial license. Furthermore, the application must include information regarding the nature of the transaction, and why it is desirable, i.e., in the public interest, to transfer the license. The Commission also has the discretion to require the applicant to supply additional information pertaining to safeguards against the "hazards from radioactive materials and the applicant's qualifications to protect against such hazards."

Based upon the above, it should be self-evident that issues pertaining to financial qualifications of the transferee and issues pertaining to potential increases in exposure to radioactivity may be litigated in the context of an NRC license transfer proceeding.

THE APPLICATION DOES NOT MEET THE CRITERIA SET FORTH IN 10 C.F.R. 50.33

The information submitted by Applicants pertaining to their financial qualifications is insufficient to meet the specific criteria of 10 C.F.R. 50.33(f). Furthermore, the available information poses questions, and raises concerns, that should properly be adjudicated in a public hearing, especially since crucial financial data has been redacted. The redaction of the financial information precludes the public from full participation in this proceeding, and raises a barrier to the Petitioners' ability to plead financial issues with specificity. An applicant that relies upon redacted applications should not be able to use that application as a shield and sword to preclude intervention by the public, especially when Petitioners are the host community for the subject nuclear facilities.

The adequacy of ENIP's and ENO's financial resources pertains both to the ability of the Applicants to adequately fund the decommissioning and greenfielding of the Indian Point site, and to the ability of the transferee to respond appropriately in the event of an accident or default.

As the application notes, ENIP and ENO are newly formed entities (Application pg. 7). The Commission has the specific authority to require financial information for such newly formed entities pursuant to §50.33(f)(4). ENIP has only one prospective asset, the Indian Point facility itself. ENO, which does not appear to have any assets besides operation and maintenance agreements, will operate the Indian Point facility, and will be paid for its services by ENIP at cost (Application pg. 8). IP3 will be owned and

operated by two entities, one of which apparently has no assets, and the other of which has only one asset, the facility itself.

The application also advised that these two entities will have access to a line of credit of $20 million from an affiliate company named Entergy Global Investments, Inc. and an additional $50 million line of credit from Entergy International Ltd., LLC. However, there is nothing in the application, or in any of the enclosures or attachments to it, that provide any guidance as to whether these sums will be adequate for any liabilities that may arise, or for that matter, as to the resources of the entities that are offering these lines of credit.

It appears that pages 6 and 7 of the application do contain information, as is explicitly required by 50.33(f)(2), regarding the Applicants' estimates for the total annual operating costs for the first five years of operations. However, it appears that this information has been redacted, and is therefore not available to the public or to the Petitioners. The redaction of this information makes it difficult, if not impossible, to conduct a proper review of whether the proposed transferee has adequate financial resources.

First, in the absence of this information, Petitioners cannot ascertain whether the Applicants will have adequate financial resources to operate the facility and to fund any liabilities that may arise. According to the purchase agreement, Entergy agreed to sell power to the Authority at a fixed price of 3.6 cents per kilowatt-hour during the first five years of operations. Part of the consideration for this rate was obviously an adjustment of the purchase price for the facility. If the Authority had received more money as part of

its sale price, it would, presumably, have agreed to pay more for the cost of electricity that is being provided; conversely, had the sale price been lower, the transferee would presumably been willing to sell the electric power output to the Authority at a lower price. Therefore, the revenues for ENIP for the first five years of its operations are likely to be more closely related to the initial sale price than they are to the operating costs of the facility. Even if the revenues are sufficient to cover the operating costs (and Petitioners have no way of knowing this information, given the redaction), the ratio of costs to revenues has been artificially manipulated by the purchase price.

Furthermore, Petitioners' concerns with respect to the ability of the transferee to provide adequate funding for its operations are exacerbated by the determination of the Applicants to redact crucial information. The credit agreement (Enclosure 8), the financial (Enclosure 9), and, most critically, the financial statement for IP3 (Enclosure 10) have all been redacted from the application. The information that is included in the application, the bond ratings for selected Entergy subsidiaries (Enclosure 3), is hardly reassuring. Standard and Poor's rates the bonds of six affiliates of Entergy between BBB- to BBB+ for the years 1997 through 1999. Moody's rates these bonds between Baa2 and Baa3 for the last three years. The failure of any Entergy affiliate to obtain any rating beginning with an "A" does not speak well for the ability of a new Entergy affiliate, ENIP, with no assets other than the Indian Point facility itself, to meet its financial obligations.

It should also be noted that §50.33(g) specifically requires an applicant to submit the radiological emergency response plans of state and local governmental entities. It

should be noted that this information is missing from the application, and instead, we are told, in a conclusory manner, that the same plans that were previously in effect will be continued. However, prior to transfer, the emergency response plans were administered by a state agency that funded these operations by the sale of power from the facilities.

According to documents prepared by the Authority, purportedly in compliance with the New York State Environmental Quality Review Act, the sales agreement provides for the transfer of all of the Authority's assets used to provide emergency warning systems and any rights that the Authority has with respect to emergency preparedness issues. The Authority also states, in the same document that the public funding for these services is "expected" to continue, without providing any basis for this conclusion or stating the source of this funding (see ¶¶ 82-84 of Petition in Town of Cortlandt et. al. v. Power Authority of the State of New York, et. al., attached to the Affidavit of Peter Henner dated July 31, 2000).

Therefore, it is not clear, either from the application, or from any other source, who will be administering these emergency response plans; whether they will be administered by the new owners, or whether the State will continue to administer these programs using unidentified resources.

The deficiencies of the application constitute grounds for the Commission to reject the application and to require the submission of further information, or at the very least, to order the Applicants to make the redacted information for public review and comment. However, as discussed below, these inadequacies pertain to specific concerns

of Petitioners, which constitute admissible issues that should be adjudicated in a hearing before the Commission.

TIMELINESS OF HEARING REQUEST

It is the Applicants' view that Petitioners' hearing request should be denied because of the failure of Petitioners to serve the July 31, 2000 Supplemental Filing by a method that would ensure receipt by the Applicants no later than the July 31 deadline. Significantly, the Applicants do not allege any prejudice from failure to properly serve the Supplemental Filing upon them on July 31, and, in any event, were not precluded from filing their Answer.

The Commission has the authority to disregard Petitioners' defects in effecting service (10 C.F.R. 2.1329(a)). Given the lack of prejudice to the Applicants, Petitioners respectfully maintain that the Commission should do so.

The failure to serve Applicants by either fax or e-mail on July 31, 2000 was the result of a communication error with the office of the Secretary to the Commission. Petitioners erroneously believed, as a result of a phone conversation with that office, that it was sufficient to file the papers with the Commission on the due date, while effecting service on other parties by first-class mail. Petitioners, and especially their counsel, apologize for any inconvenience or consternation caused by the service of the July 31 filing. Had the Applicants's counsel communicated this concern to the petitioner's counsel on August 7, 2000 when Applicant's counsel had requested the furnishing of a page omitted in copying the filing, Petitioners would have immediately furnished a copy of the pleading by e-mail.

It should also be noted that, as a technical matter, the Applicants' Answer is itself untimely. This Answer was filed on August 14, 2000. However, an answer was due ten (10) days after Petitioners' deadline for a Supplemental filing of July 31st. In other words, the Applicants' Answer was due on August 10, 2000. The Applicants will no doubt say that their lateness in filing an answer was due to the fact that they did not receive Petitioners' Supplemental filing until "several days" after July 31st. However, if the late filed Answer is to be accepted by the Commission, then it follows that the Applicants have not been prejudiced by the late service of Petitioners' Supplemental filing.

PETITIONERS HAVE STANDING

The Applicants dispute whether Petitioners have standing by arguing that Petitioners will not be adversely affected by the transfer, and any impact that they may suffer is unrelated to the issues involved in the licensing proceeding. This statement is wholly without merit.

The Commission has traditionally utilized a liberal standard with respect to allegations of standing, especially for governmental entities that host nuclear facilities. Indeed, if Petitioners, a municipality and school district representing citizens who live immediately adjacent to IP3, do not have standing in this proceeding, it is hard to see what individuals or entities would have standing to intervene in this proceeding.

In any event, the issues described in Petitioners' earlier filings, relating to license renewal, the ability to fund decommissioning, and the ability of Applicants to assume responsibility for any accident or default, all pertain to the inadequacy of the financial

resources of the Applicants. Furthermore, possible changes in emergency response plans and possible increased chances of exposure to radiological materials as a result of an extension of time for the storage of spent nuclear fuel are also plainly issues which constitute concrete and particularized injuries. These issues are clearly within the scope of the instant license transfer proceeding. Because a determination of the Commission pertaining to the adequacy of the proposed transferee's funding and/or pertaining to the emergency response planning and storage of fuel could provide redress for these injuries, Petitioners have standing.

ADMISSIBILITY OF ISSUES

A. DECOMMISSIONING AND GREENFIELDING

Issues pertaining to the timing and extent of the ultimate decommissioning of a nuclear facility are within the scope of a license transfer proceeding. The decommissioning of a nuclear facility pertains to the extent to which the public will be protected against hazards from radioactive materials, an issue plainly within the scope of Commission proceedings. Furthermore, the ability to decommission a nuclear facility depends upon the financial resources of the licensee, and the financial qualifications of the proposed transferee are within the scope of a license transfer proceeding. Therefore, Petitioners' concerns about the ability of the transferee's ability to fund the decommissioning and ultimate greenfielding of the Indian Point site are "admissible" issues. Moreover, as greenfielding of the site as well as those of IP2 and IP1, for which greenfielding has already been approve by the Commission, are part of a social compact with the Petitioners, which was necessary for the siting of IP3, the ability of any and all

transferees to abide by that compact should be fully examined and no transfer should be approved if it jeopardizes that compact.

It appears, from the application, that the ultimate decommissioning of the site will be funded from monies, which have previously been allocated by the Authority to a decommissioning fund. It further appears to be the position of the Applicants that the monies that are presently in this fund are adequate to pay for the ultimate decommissioning of the facility, based upon an assumption that the decommissioning with occur after the expiration of the license in 2015. These assumptions are highly doubtful in light of the joint and several liability that ENIP has incurred with regard to the JAF financial obligations. Nevertheless, based upon the unsupported assumption that adequate funds exist for decommissioning, the Authority will cease making contributions to the decommissioning fund (Application, pg. 12).

Therefore, any inadequacy or shortfall in the funds that will be required for decommissioning will have to come from the transferees, presumably from ENIP. However, as noted above, there is a serious question as to whether the transferees have adequate resources even to conduct operations. Therefore, Petitioners maintain that the Applicants do not have adequate resources to make any additional contributions to the decommissioning fund. If adequate resources exist for the decommissioning, these resources must be found in the fund, which has previously been established.

The Applicants apparently assume that such resources do exist based upon their contention that $308.4 million is presently in the decommissioning fund and that this sum is greater than the current decommissioning estimate of $292 million. The application

"escalates" this NRC minimum to the end of the license as $468 million (page 16), and concludes that the $308.4 million in the fund will be adequate to meet that cost figure at the expiration of the license.

It is important to remember that no nuclear facility has yet been decommissioned, and the actual costs may be significantly higher than the Commission's cost estimates. Furthermore, there may well be additional expenses required above the Commission cost estimates, and in the event that the transfer is approved, these costs will have to be paid by ENIP. Therefore, a decommissioning fund should include a reserve above the "minimum", especially where, as here, the proposed licensee is a shell corporation with no present assets and only the expectation of acquiring the IP3 the facility. In the absence of such a reserve, a question of financial ability to fund the decommissioning of the facility exists, and is proper for adjudication in the instant proceeding.

The Applicants argue that the timing of the decommissioning (i.e. whether decommissioning will occur in 2015, at the expiration of the current license, or whether the license may be renewed) is beyond the scope of the instant proceeding. However, as long as the facility is operating, there is obviously some exposure to radiological hazards. Some exposure will occur over the normal course of the facility's operations, and additional exposure will occur as a result of the postponement of the decommissioning. Furthermore, a delay in the decommissioning will also subject the public to the additional hazard of storage of spent nuclear fuel on site. There are issues that are obviously within the purview of the Commission.

The Applicants claim that there is no reason to believe that the Authority, the present licensee, would be less likely to apply for a license renewal if it retained ownership of IP3. However, while it would be pure speculation as to what the Authority would do if the application were denied, and the Authority was forced to continue to own IP3, the question of what ENIP will do is an appropriate matter for a hearing. ENIP is purchasing a facility with 15 years left on its operating license, and ENIP must, as part of the financial considerations involved in an expenditure of hundreds of millions of dollars, have made some determinations as to whether its investment is for the remainder of the license period, or whether a license renewal is necessary to justify its investment. This financial analysis should be part of the public record pertaining to the transfer application, and more important, the Commission, as part of its review of the license transfer application, should adjudicate questions pertaining to the impacts of this analysis.

Therefore, Petitioners respectfully maintain that the issue of the extension of a facility's operations as a result of a license transfer is an appropriate issue to be adjudicated in the context of a Commission licensing proceeding. Although no license renewal application has yet been filed, the possibility that the proposed transfer will increase the likelihood of such a renewal application, with increased radiological exposure, should be reviewed by the Commission as part of its consideration of the transfer application.

This is especially true in the instant case, since there are three units at Indian Point, which will ultimately need to be decommissioned. The Applicants argue that Petitioners' belief that a license renewal for IP3 will delay the ultimate decommissioning

for IP1 and IP2 is "speculation." However, it should be noted that IP1, which has not operated for than twenty-five (25) years, has not yet been fully decommissioned and its site returned to greenfield status because the Commission has approved the delay of decommissioning in order to accommodate Consolidated Edison's plan to decommission both IP1 and IP2 at the same time. Therefore, it is reasonable to assume that the decommissioning of IP2, as well as the long deferred decommissioning of IP1, will be deferred until all three sites can be decommissioned at the same time (especially if Entergy purchases IP2 from Consolidated Edison).

Obviously, a delay in the decommissioning of any of the facilities will result in increased exposure to radiological hazards, especially if spent fuel is stored on site until such time as the facilities are ultimately decommissioned. Similarly, any change in the commitment to greenfield IP3 will impact the need to greenfield IP1 and IP2.

The Applicants apparently believe that these issues can be ignored because of their claimed need to proceed as quickly as possible. However, despite their "need" for expedited consideration, Petitioners believe that the Applicants' efforts, like the recently abandoned AmerGen effort to acquire the Nine Mile I and II nuclear plants in Scriba, New York, will continue despite the passage of the target transaction date (in that case, the refueling of Nine Mile II).

Finally, Petitioners also maintain that the extent of the decommissioning, and whether or not the site will ultimately be restored to greenfield conditions, is not beyond the scope of this proceeding. According to the Applicants, the NRC's decommissioning requirements do not extend to non-radiological matters. However, even if we accept this

argument, the question remains as to whether monies in the decommissioning fund, which was established by contributions by the Authority, will still be utilized for the remediation of environmental problems that were the result of operations at the site.

The monies in the decommissioning fund were contributed based upon the Authority's commitment to the surrounding community, including Petitioners, to restore the site to greenfield conditions. Therefore, Applicants should not be permitted to say that the issue of greenfielding is outside the scope of the instant transfer proceeding, while, at the same time, claim that monies committed to the greenfielding of the site should be included in the resources available for the decommissioning of the facility. Their claim to ignore greenfielding is "Ozian" at best, wherein one is asked to ignore the man behind the green curtain.

Petitioners respectfully maintain that a distinction cannot be drawn, at least with respect to determining the adequacy of the decommissioning efforts in this case, between radiological and non-radiological remediation. Where, as in the instant case, the previous owner has already committed to restoration of the site to greenfield conditions, and funds have been appropriated for that restoration, the Commission must consider whether the decommissioning funds are adequate to perform the complete restoration to greenfield conditions. In other words, some of the monies in the decommissioning fund have been previously committed for non-radiological matters. If the Commission considers such funds as available for decommissioning purposes, the Commission should recognize that those monies were allocated upon the assumption that decommissioning involved the remediation of both radiological and non-radiological conditions.

B. FINANCIAL QUALIFICATIONS OF THE TRANSFEREE

As discussed above, there are serious questions as to whether ENIP and ENO have the financial capability of fulfilling the responsibility of operating IP3. Petitioners, in their initial filings, raised the issue of whether the Applicants would be able to meet their obligations in the event of unforeseen liability because of the "joint and several liability" of ENIP and ENJAF.

Petitioners' concerns are exacerbated by the fact that nearly all of the relevant information has been redacted from the application, and the public does not have the ability to ascertain the financial resources of the Applicants. This material should be made available to the Petitioners pursuant to a protective order issued by the Commission as part of the hearing process.

C. EMERGENCY PLANNING

As noted above, the Applicants have an obligation to address the adequacy of emergency response plans in the license application. However, in this case, no explanation has been offered as to how the emergency response plans will be funded, or whether functions pertaining to the training of emergency personnel or preparedness programs will be conducted by the Authority or by the Applicants. Although the Authority has indicated its intention to continue its existing programs, it has transferred all of its assets for such programs to the Applicants. Inasmuch as the Applicants have not clarified this issue, it is an appropriate subject for consideration at a hearing, since the issue must be determined before the Commission can approve the transfer of the license.

OTHER CONCERNS

Entergy Corporation, the parent corporation of Applicants, is presently undertaking several actions, which may affect the contemplated operations at the two facilities that are the subject of the instant transfer application. Specifically, Entergy is reportedly is considering the acquisition of Consolidated Edison's Indian Point No. 2 facility. Entergy is also considering a merger with Florida Power and Light ("FPL"). Both of these prospective actions may have implications upon the instant transfer application that should be considered by the Commission before the Commission approves the transfer of IP3 and Fitzpatrick licenses. Furthermore, the FPL merger and IP2 acquisition have a direct impact upon numerous analyses offered by the applicants with regard to market share. These impacts should be considered as part of the present application, since these impacts effectively outdate the information contained in the application, and render it stale and incomplete. Indeed, such a merger may require the submission of the additional information required by 10 C.F.R. 50.34.

If Entergy acquires, indirectly or directly, both IP2 and IP3, there will be common issues pertaining to Entergy's market share, as well as issues pertaining to financial liability and possible increased radiological hazards. There will be even more potentially serious issues concerning market shares if Entergy merges with Florida Power and Light, because of the possibility that the combined company may have an inordinate amount of control over the United States' nuclear industry.

The New York State Public Service Commission has recently issued an order requiring the New York Independent System Operator to provide the PSC information on

an ongoing basis, pertaining to the reliability to electric generation sources seeking to sell power through the NYISO, which does not necessarily mean that that power will be sold in New York State. This order is a clear illustration of the growing concern, especially in the Northeast, with respect to high prices for electricity and with respect to the reliability of nuclear electric generation facilities. Petitioners share this concern, and note that, as customers who purchase power generated at the IP3 facility, they would be especially hard hit by the failure of ENIP to generate power at the Indian Point facility.

CONCLUSION

For the reasons set forth above, Petitioners respectfully maintain that the issues that they have raised in their earlier filings, as clarified above, are sufficient to demonstrate the existence of admissible issues. Consequently, their Petition for leave to intervene should be granted, and the Commission should conduct a hearing with respect to the application to transfer the license of the Indian Point No. 3 facility.

Respectfully submitted,

Peter Henner, Esq.
P.O. Box 326
Clarksville, New York 12041
(518) 768-8232
phenner@dellnet.com

Paul Nolan, Esq.
5515 N. 17th Street
Arlington, Virginia 22205
(703) 534-5509
pvnpvn@aol.com

Counsel for Town of Cortlandt, New York, and the
Hendrick Hudson Central School District

Dated: August 21, 2000

CERTIFICATE OF SERVICE

I, Peter Henner, Esq., Counsel to the Town of Cortlandt, New York and the Hendrick Hudson Central School District, hereby certify that on the 21st day of August 2000, service of the foregoing "Reply to Applicants' Answer Opposing Hearing and Intervention Request" was made via facsimile and first class mail, with an email copy provided to the Secretary, on this 21st day of August 2000, upon the parties noted below and in the attached service list.

Jay E. Silberg
Matias F. Travieso-Diaz
William R. Hollaway
SHAW PTTMAN
2300 N Street, NW
Washington, DC 20037-1128
(Fax: 202-663-8007)

Michael R. Kansler
Senior Vice President
Chief Operating Officer-Northeast
Entergy Nuclear Indian Point 3, LLC
123 Main Street
White Plains, NY 10601
(Fax: 914-287-4644)

James Knubel
Senior Vice President
Chief Operating Officer
New York Power Authority
123 Main Street
White Plains, NY 10601
(Fax: 914-287-3309)

Dated this 21st day of August 2000

Peter Henner, Esq.
Counsel to the Town of Cortlandt, New York and the
Hendrick Hudson Central School District

P.O. Box 326
Clarksville, New York 12041
(518) 768-8232
(518) 768-8235 [fax]
phenner@dellnet.com

SERVICE LIST

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Lawrence J. Chandler, Esquire
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(Fax: 301-415-3725)
(ljc@nrc.gov)

Douglas Levanway, Esquire
Wise, Carter, Child and Caraway
P.O. Box 651
Jackson, MS 39205
(Fax: 601-968-5519)
(del@wisecarter.com)

Tim Judson
Citizens Awareness Network
162 Cambridge Street
Syracuse, NY 13210
(Fax: 315-475-1203)
(cnycan@rootmedia.org)

Gerald Goldstein, Esquire
Assistant General Counsel
New York Power Authority
1633 Broadway
New York, NY 10019-6756
(Fax: 212-468-6206)
(goldstein.g@nypa.gov)

Alan D. Scheinkman, Esquire
County Attorney
Stewart M. Glass, Esquire
Dept. of Law, Room 600
148 Martine Avenue
White Plains, NY 10601
(Fax: 914-285-2495)
(smg4@westchestergov.com)

Joseph R. Egan, Esquire
Egan & Associates, P.C.
1500 K Street, NW, Suite 200
Washington, DC 20005

Richard J. Koda
Koda Consulting
Consultant to Local 1-2, UWUA, AFL-CIO
409 Main Street
Ridgefield, CT 06877-4511
(Fax: 203-438-7854)

Carl F. Lodes, Esquire
County Attorney
County of Putnam
48 Gleneida Avenue
Carmel, NY 10512
(Fax: 914-225-0539)

John Valentino, Esquire
Green & Seifter, Attorneys, P.L.L.C.
One Lincoln Center, 9th Floor
Syracuse, NY 13202
(Fax: 315-422-3549)
(jvalentine@greenseifter.com)