



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
ENVIRONMENTAL PROTECTION BUREAU

December 21, 2011

Lawrence G. McDade, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop - T-3 F23
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Richard E. Wardwell
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Mail Stop - T-3 F23
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Dr. Kaye D. Lathrop
Administrative Judge
Atomic Safety and Licensing Board
190 Cedar Lane E.
Ridgway, CO 81432

Re: Indian Point Nuclear Generating Station, Unit 2 and Unit 3
Docket Nos. 50-247-LR/50-286-LR; ASLBP No. 07-858-03-LR-BD01

Dear Administrative Judges:

The State of New York submits its Statement of Position, Pre-filed Testimony, and Exhibits (NYSR70001 and NYS000240 to NYS000292) in support of consolidated contention NYS-12C. Also enclosed is a certificate of service.

As noted, the State filing its submissions in advance of the deadline for logistical reasons given the number of admitted contentions and to minimize the load on the EIE server and system. The State intends to make additional submissions in support of its other admitted contentions in the coming days.

Respectfully submitted,

Signed (electronically) by

John J. Sipos
Assistant Attorney General

cc: All individuals, parties, or NRC offices on EIE Service List