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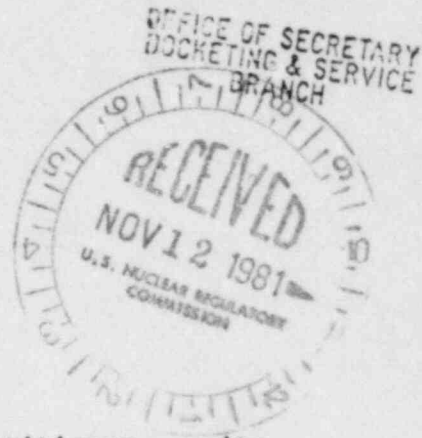
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Consolidated Edison Company of New York)	
(Indian Point, Unit 2))	Docket Nos. 50-247
	50-286
Power Authority of the State of New York)	
(Indian Point, Unit 3))	



PETITION FOR LEAVE TO INTERVENE

1. The Friends of the Earth, Inc., also known as FOE, Petitioner, on its own behalf and on behalf of its members, hereby petitions the Nuclear Regulatory Commission (NRC) for leave to intervene in the above captioned matter, pursuant to 10 CFR 2.714 of the NRC's Rules of Practice and to the NRC's Order dated September 18, 1981.

2. Petitioner is a national environmental group located at 208 West 13th Street, New York, New York 10011. It is a person within the meaning of 10 CFR 2.4 (o). Petitioner represents 28,000 members nationally and approximately 4,000 in New York State, all of whom pay dues to the national headquarters at 124 Spear Street, San Francisco, California 94105, and some of whom also pay dues to the regional chapter in New York, which serves New York State. Its primary purposes are public education, lobbying and influencing legislation, and publishing, and litigation and monitoring of government administrative actions and implementation. Past legal involvement includes the Vallecitos reactor at Livermore, California; the proposed Exxon reprocessing plant at Oak Ridge, Tennessee; Rancho Seco and Diablo Canyon plants in California; the Shoreham, Long Island, reactor at Wading River, New York. Friends of the Earth's expertise and continual involvement in nuclear power safety issues will greatly assist in the development of a complete hearing record.

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Petitioner represents the interests of its members and the individuals with whom it regularly communicates. These individuals are directly affected by this proceeding since the operation of Indian Point Units 2 and 3 has affected and will continue to affect their personal safety as well as the nature and quality of their lives, their property and leasehold values, their employment and business interests. In this proceeding, Petitioner Friends of the Earth seeks to intervene on behalf of itself and the following named persons, all of whom are sponsors or members of FOE and who have specifically authorized FOE to represent their interest in the Indian Point hearings and all of whom have a cognizable interest in the outcome of the proceedings:

Anthony Bambace
100 Columbus Avenue
Tuckahoe, New York 10707

Dr and Mrs. Paul Bradlow
43 Charlton Street
New York, New York 10014

Mildred M. Barker
R.R. 2, Box 501
Kerhonkson, New York 12446

Carol Gorman
10 Hilliard Avenue
Edgewater, New Jersey 07020

Philip Powers
251 West 97th Street
New York, New York

Polly Rothstein
Lincoln Avenue
Purchase, New York 10577

4. Section 189(a) of the Atomic Energy Act, 42 U.S.C. 2239 (a) requires that the Commission admit as a party "any person whose interest may be affected by the proceeding". Petitioner FOE requests leave to intervene to represent the interests of its own members, and the interests of the above named members in particular. Petitioner's interest that Indian Point Units 2 and 3 not continue operation until protection of the public health and safety can be reason-

ably assured is clearly within the scope of the interests that the Atomic Energy Act was intended to protect.

5. Petitioner seeks leave to intervene with respect to the following specific issues:

- 1) Existing alternative strategies in place of continued operation of the Indian Point nuclear plants;
- 2) Economic and social benefits of such alternative strategies;
- 3) Inadequacy of the Indian Point emergency plans;
- 4) Inability of licensees and localities to implement a plan that could significantly reduce public risk;
- 5) Probability of catastrophic accident not low enough to permit continued plant operation in any time frame;
- 6) Continued plant operation and national security are incompatible.

6. For all the foregoing reasons, Petitioner requests leave to intervene in the above captioned proceeding pursuant to the NRC's January 8, 1981, Order, amended September 8, 1981, in regard to the Indian Point Units 2 and 3 Nuclear Power Station.

Respectfully submitted,

Lorna Salzman

Lorna Salzman
Mid-Atlantic Representative
Friends of the Earth

Dated: November 4, 1981

Service list enclosed

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CERTIFICATE OF SERVICE

I certify that I have served copies of Petition to Intervene on the following parties by first class mail, postage paid, this 4th day of November 1981.

Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Louis J. Carter, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Oscar H. Paris, Member
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Frederick J. Shon, Member
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Washington, D.C. 20555

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Lorna Salzman