

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

ATOMIC SAFETY AND LICENSING BOARD

'81 NOV -9 P2:56

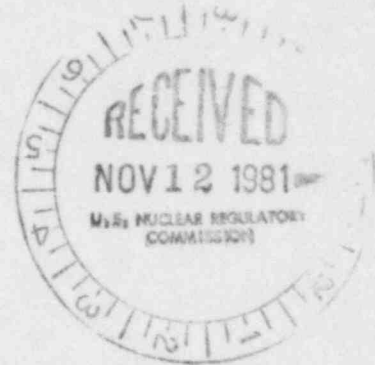
Before Administrative Judges:  
Louis J. Carter, Chairman  
Dr. Oscar H. Paris  
Frederick J. Shon

emp  
OFFICE OF SECRETARY  
LICENSING & SERVICE  
BRANCH

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In the Matter of

CONSOLIDATED EDISON COMPANY OF NEW YORK  
(Indian Point, Unit 2)

POWER AUTHORITY OF THE STATE OF NEW YORK  
(Indian Point, Unit 3)  
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PETITION FOR INTERVENTION

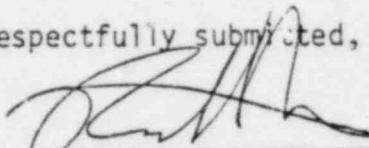
1. Ruth Messinger, Miriam Friedlander, Carol Greitzer, Stanley E. Michels, Susan D. Alter, Edward C. Wallace, Mary Pinkett, Mary T. Codd, Gilberto Gerena-Valentin, and Arthur J. Katzman, are all members of the Council of the City of New York, and, as such, are each a representative of a municipality. We hereby petition for leave to participate as an Interested State in the above-captioned matter, pursuant to 10 CFR § 2.715 (c).

2. Our constituents are affected by the outcome of these hearings in that continued operation of the Indian Point reactors without adequate safety and emergency planning would seriously threaten their

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health and well-being in the event of an accident, in spite of their living beyond the 10-mile inhalation Emergency Planning Zone (EPZ). The constituents do all live within the 50-mile ingestion pathway Emergency Planning Zone (EPZ). It is these constituent interests which we would seek to represent at the hearing.

Respectfully submitted,

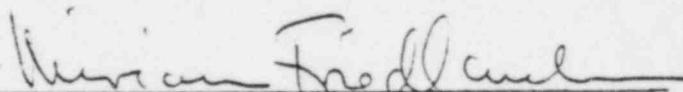


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MIRIAM FRIEDLANDER

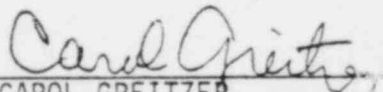
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Dated:  
New York, New York  
November 6, 1981



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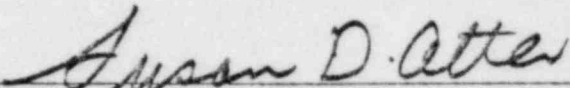
STANLEY E. MICHELS

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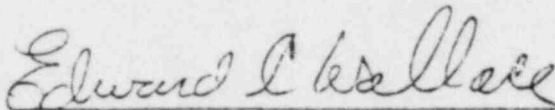
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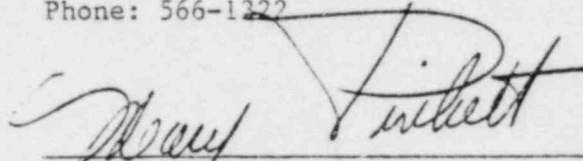
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SUSAN D. ALTER

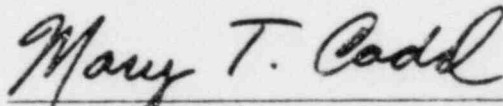
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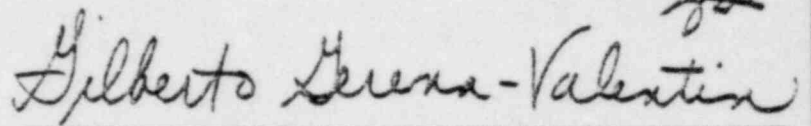
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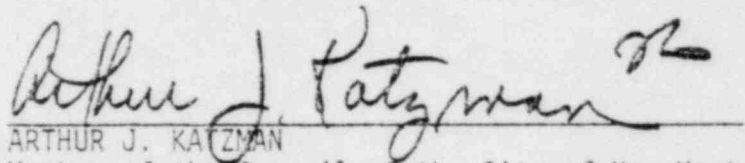
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ARTHUR J. KATZMAN

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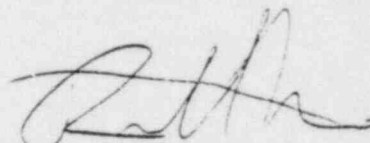
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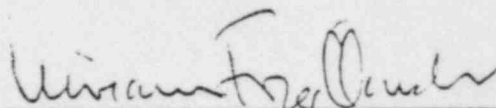
Joan Holt, Director  
Indian Point Project, NY Public  
Interest Research Group  
5 Beekman Street  
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Dated: November 6, 1981



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RUTH MESSINGER



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MIRIAM FRIEDLANDER