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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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 County of Rockland, also known as Rockland, Petitioner, on its own behalf and on behalf of its citizens and 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 municipality with an office for the transaction of business at 11 New Hempstead Road, New City, New York. It is a person within the meaning of 10 CFR 2.4(o). Petitioner represents approximately 250,000 individuals who live within its borders. Rockland County is situated on the west bank of the Hudson River; its geographical center lies 33 miles north of the Manhattan business district of New York City. Within 20 miles of Rockland County lies the Hudson River Valley to the north, Westchester County and Connecticut to the east,

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Northern New Jersey to the south, and Orange County to the west. Rockland is a triangle of about 176 square miles, 18x19x20 miles on its borders. A substantial portion of Rockland County is located within a ten mile radius of Indian Point Units 2 and 3, and approximately 114,000 of Petitioner's citizens live within the Emergency Planning Zone.

3. Petitioner represents the interests of its citizens and 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 health and 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, the County of Rockland, seeks to intervene on behalf of itself and the following persons, all of whom are both citizens and public officials of the Petitioner, and who have specifically authorized the County of Rockland to represent their interests in the Indian Point hearings, and all of whom who have a cognizable interest in the outcome of the proceeding.

JOHN T. GRANT, Chairman of the Rockland County  
Legislature, Birch Drive, Thiells, New York

DR. DANIEL HYMAN, Rockland County Commissioner  
of Health, Pomona Health Complex, Pomona, New York

DONALD A. HASTINGS, Fire Coordinator, Fire  
Training Center, Pomona, New York

4. Section 189(a) of the Atomic Energy Act, 42 U.S.C. 2239(a) requires that the Commissioner admit as a party "any person whose interest may be affected by the proceeding." Petitioner, County of Rockland, requests leave to represent the interests of its citizens and members, and the interests of the above named individuals 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 reasonably 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:

All issues regarding the health, safety and welfare of the citizens of Rockland County, including the following:

- (A) The current status and degree of conformance with NRC/FEMA guidelines of state and local emergency planning within the ten mile radius of the site, and of the extent that it is relevant, to risks posed by the two plans beyond a ten mile radius.
- (B) The improvements in the level of emergency planning which can be expected in the near future, the time schedule involved, and whether there are other specific offsite emergency procedures that are feasible and should be taken to protect the public.

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.

Dated: New City, New York  
November 6, 1981

Respectfully submitted,  
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of Counsel

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CERTIFICATE OF SERVICE

I certify that I have served copies of:  
on the following parties by first class mail, postage paid this  
\_\_\_\_\_ day of \_\_\_\_\_, 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  
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