

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER
PROD. & UTIL. FAC. 50-247,286

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

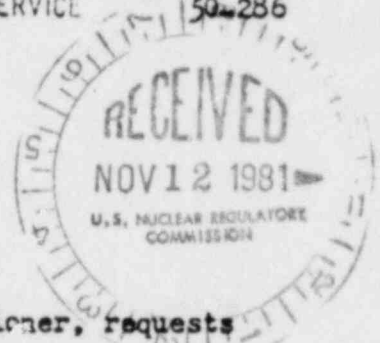
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In the Matter of

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

POWER AUTHORITY OF THE STATE OF NEW YORK
(Indian Point Unit 3)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket Nos. 50-247
50-286



PETITION FOR LEAVE TO INTERVENE

1. Parents Concerned About Indian Point, Petitioner, requests leave to intervene in the Indian Point hearings which the Commission called for in the Order of January 8, 1981, which was amended on September 18, 1981. Petitioner requests leave to intervene pursuant to the Rules of Practice of the Nuclear Regulatory Commission at 10 CFR 2.714.

2. Parents Concerned About Indian Point is a group of residents in the affected area surrounding Indian Point Nuclear Power Plants who are parents, teachers, grandparents, or other people who are particularly concerned about the welfare of children in the event of an accident at the Indian Point Nuclear Power Plants. The mailing address for the group is Post Office Box 125, Croton-On-Hudson, New York, 10520.

3. Petitioner requests leave to intervene to represent the interests of members of the group and their families, including the following named persons who have authorized the group to represent their interests and the interests of their families in the hearing:

Ms. Pat Posner
22 Park Trail
Croton-On-Hudson,
New York, 10520

Ms. Ervine KLaerling
34 Piney Point Avenue
Croton-On-Hudson
New York, 10520

Fred & Debby Bobson
36 Heatherdale Road
Ardsley,
New York, 10502

Ms. Phyllis Rodriguez
64 Elmore Avenue
Croton-On-Hudson
New York, 10520

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4. Petitioner Parents Concerned About Indian Point seeks leave to intervene because the continued operation of Indian Point Nuclear Power Plants threatens the personal health and safety of the members of Petitioner's group and their families because an accident at the Indian Point Nuclear Power Plants would release radiation which could affect Petitioner's members at their homes, schools and places of business or recreation. Petitioner seeks to protect the interests of their children who would be psychologically and emotionally, as well as physically, damaged by any accident at Indian Point Nuclear Power Plants.

5. Parents Concerned About Indian Point specifically seeks leave to intervene in respect to the following issues which will be developed further in formal contentions:

- (i) Whether the psychological, emotional, and physical health and safety of children are adequately protected against the dangers of Indian Point Nuclear Power Plants.
- (ii) Whether the emergency response plans for Indian Point, both within and without the Emergency Planning Zone, conform with NRC/FEMA guidelines, are capable of being implemented, and are adequate to protect the health and safety of children.
- (iii) The effects on children's environment of the permanent closing of Indian Point Nuclear Power Plants.

6. For the foregoing reasons, Petitioner Parents Concerned About Indian Point requests leave to intervene in the above-captioned hearings.

Respectfully submitted,

Pat Posner

Pat Posner, Spokesperson
Parents Concerned About Indian Point
PO-Box 125
Croton-On-Hudson
New York, 10520

November 5, 1981
Service list Attached.

Parents Concerned About Indian Point

Service list:

Samuel J. Chilk, Secretary
USNRC
Washington, DC. 20555

Louis J. Carter, Chairman
ASLB, USNRC
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Oscar H. Paris, Member
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Frederick J. Shen, Member
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