

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))

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

Docket Nos. 50-247 SP
50-286 SP

April 30, 1982

UCS/NYPIRG's FIRST SET OF INTERROGATORIES TO AND
REQUEST FOR DOCUMENTS FROM NEW YORK STATE ENERGY
OFFICE, IN ITS OWN CAPACITY AND AS A REPRESENTATIVE
OF ALL OTHER NEW YORK STATE SUBDIVISIONS, DEPARTMENTS,
COMMISSIONS, AGENCIES, AND CONSULTANTS IN POSSESSION
OF THE INFORMATION REQUESTED HEREIN

The New York Public Interest Research Group, Inc. and the
Union Of Concerned Scientists serves on New York State the
interrogatories and request for production of documents that
appear below. A sworn response to them must be provided to the
New York Public Interest Research Group, Inc. and the Union of
Concerned Scientists at 5 Beekman Street, New York, New York 10038
in accordance with the Order of the Atomic Safety and Licensing
Board of April 23, 1982. If the answer to any question is not
known when the response is filed, the answer must be provided as
soon as the missing information becomes available.

As used in the interrogatories and request for production of
documents, the following definitions apply:

1. "Con Edison" and "PASNY" mean Consolidated Edison Company
of New York and Power Authority of the State of New York, respec-
tively, their officers, agents, employees, and consultants.

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2. "NY State" or "state" means New York State, or any subdivision, department, agency, commission or consultant thereof that you are aware of that is involved with planning, preparing, maintenance and possible implementation of the New York State Radiological Emergency Response Plan as it would relate to an accident at Indian Point. Such divisions and agencies include but are not necessarily limited to Disaster Preparedness Commission, Department of Health, Nuclear Emergency Planning Group.

3. "NYSRERP" or "plans" or "emergency plans" means the New York State Radiological Emergency Response Plans and all of its appendixes, attachments and revisions, including all other documents or plans referenced in the New York State Radiological Emergency Response Plan *For Indian Point.*

4. "Facts" include the calculations or other assumptions, if any, underlying various assertions of fact.

5. "Include" and "including," as used in these interrogatories, mean "including, but not limited to."

6. "Document" means any handwritten, typed, printed, recorded or graphic matter however produced or reproduced, including material stored for use in automatic data processing systems, whether or not in the possession, custody or control of New York State or any of its agencies or consultants and whether or not claimed to be privileged against discovery on any ground, including: reports; records; lists; memoranda;

Please provide answers to the following questions:

1. What is the position of NY State on the compliance of the Indian Point emergency plans with each of the sixteen mandatory standards set forth in 10 C.F.R. 50.47(b), and with the standards set forth in Appendix E to 10 C.F.R Part 50? State all opinions and documents on which the position is based, and identify the person or persons who formulated the opinions and /or developed the documents.

2. Provide copies of any and all documents referred to in the answer to Interrogatory 1.

3. What is the position of NY State on the assumptions about the response of the public and of utility employees utilized by or underlying the conclusions of the persons who developed the emergency plans and evacuation time estimates for Indian Point? State all opinions and documents on which the position is based, and identify the person or persons who formulated the

opinions and/or developed the documents.

4. Provide copies of any and all documents referred to in the answer to Interrogatory 3.

5. What is the position of NY State on the present estimates of evacuation times, based on NUREG 0654 and studies by CONSAD Research Corporation and by Parsons, Brinckerhoff, Quade & Douglas, Inc? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents.

correspondence; telegrams; schedules; photographs; sound recordings; films; hand, machine or computer calculations; computer codes; data; and written statements of witnesses or other persons having knowledge of the facts.

7. "Studies or observations" include physical, empirical, calculational, assumptional, and other types of work whether recorded in writing or not.

10. Provide copies of any and all documents referred to in the answer to Interrogatory 9.

11. What evaluations or review of the present time estimates for Indian Point have been done by NY State, and what person or persons participated in the review or evaluations? Were the raw data for the present time estimates obtained, evaluated and/or double-checked by NY State or for NY State? By what person or persons?

12. What evaluations or review of the present emergency plans for the State of New York have been done by NY State, and what person or persons participated in the review or evaluations? Were the raw data or computer models for the plans obtained, evaluated and/or double-checked by NY State or for NY State? By what person or persons?

13. What is the position of NY State on the reliability of Con Edison and/or PASNY to notify the proper authorities of an emergency promptly and accurately? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents. What information does NY State have or has NY State had about the performance of Con Edison and/or PASNY with regard to notifying authorities of an emergency at Indian Point?

14. Provide copies of any and all documents referred to in the answer to Interrogatory 13.

6. Provide copies of any and all documents referred to in the answer to Interrogatory 5.

7. What is the position of NY State on the assumptions contained in the present estimates of evacuation times for Indian Point? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents.

8. Provide copies of any and all documents referred to in the answer to Interrogatory 7.

9. What is the position of NY State on the methodologies utilized by CONSAD Research Corporation and by Parsons, Brinckerhoff, Quade & Douglas, Inc. and in NUREG-0654 in preparing the present estimates of evacuation times for Indian Point? State all opinions and documents on which the position is based and identify the person or persons who formulated the opinions and/or developed the documents.

20. Interrogatory # 20 omitted.

21. What is the position of NY State on the appropriateness of the present plume exposure pathway EPZ for Indian Point? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed the documents.

22. Provide copies of any and all documents referred to in the answer to Interrogatory 21.

23. What is the position of NY State on the provision of potassium iodide to the residents of the EPZ of the Indian Point plants? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/ or developed the documents.

24. Provide copies of any and all documents referred to in the answer to Interrogatory 23.

25. What is the position of NY State on the sheltering capability in the EPZ of the Indian Point plants? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the documents.

26. Provide copies of any and all documents referred to in the answer

15. What is the position of NY State on the range of accident scenarios and meteorological conditions taken into account in the emergency plans and proposed protective actions for Indian Point? Specify the accident scenarios and meteorological conditions that are taken into account in the emergency plans and proposed protective actions for Indian Point. State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinions and/or developed the documents.

16. Provide copies of any and all documents referred to in the answer to Interrogatory 15.

17. Does the State have an independent set of standards for what constitutes an acceptable radiation dose resulting from an accident at Indian Point, or does the State adopt the federal standards? Describe and explain fully.

18. Are there any federal radiation standards which the State currently believes are insufficient to protect the public health and safety of the citizens of New York State? Explain.

19. Provide copies of any and all documents referred to in the answer to Interrogatory 17 and 18.

to Interrogatory 25.

27. What is the position of NY State on the effect of adverse weather conditions on the roadway network described in the emergency plans for Indian Point? What weather conditions result in what changes in the evacuation capabilities of the roadway network around Indian Point in the opinion of NY State. State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated and/or designed the documents.

28. Provide copies of any and all documents referred to in the answer to Interrogatory 27.

29. What is the position of NY State on the establishment of conditions on the licenses of Con Edison and PASNY relevant to evacuation capabilities of the road network around Indian Point? State all opinions documents on which the position of NY State is based and identify the person or persons who formulated and/or developed the documents.

30. Please provide copies of any and all documents referred to in the answer to Interrogatory 29.

31. What is the position of NY State on the feasibility of and need for upgrading the roadway network at Indian Point to permit successful evacuation of all residents in the EPZ before the plume arrival time? State all opinions and documents on which the position of NY State is based and identify the

person or persons who formulated the opinions and/or developed documents.

32. Provide copies of any and all documents referred to in the answer to Interrogatory 31.

33. What is the position of NY State on the feasibility of and need for upgrading of the emergency plans for the Indian Point plants to take into account the special needs of special groups and particularly those who are dependent on others for their mobility? What specific measures could and/or should be taken in this respect? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

34. Provide copies of any and all documents referred to in the answer to Interrogatory 33.

35. What is the position of NY State on the feasibility of and need for specific steps to be taken by NRC, State and local officials to promote a public awareness that nuclear power plant accidents with substantial offsite risks are possible at Indian Point? What specific steps have been or are being contemplated or considered by NY State ? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/ or developed the document.

36. Provide copies of any and all documents referred to in the answer to Interrogatory 35.

37. What is the position of NY State on the feasibility of and

need for the establishment of a maximum acceptable level of radiation exposure as an objective basis for measuring the adequacy of emergency planning at Indian Point? What levels of radiation exposure have been or are being considered by NY State as acceptable in the event of an accidental release of radiation? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

38. Provide copies of any and all documents referred to in the answer to Interrogatory 37.

39. What is the position of NY State on the feasibility of and need for the emergency planning brochure to give more attention to problems associated with persons who are deaf, blind, too young to understand the instructions, or who do not speak English? What specific additional improvements are necessary in the emergency planning brochure in the opinion of NY State in this regard? State all opinions and documents on which the position of NY State is based and identify the person or persons who formulated the opinion and/or developed the document.

40. Provide copies of any and all documents referred to in the answer to Interrogatory 39.

41. Provide copies of all reports, draft or final, resulting from the emergency planning exercise of March 3, 1982 at Indian Point.

42. What is the position of NY State on the performance of the employees and agents of NY State and the four Counties during the emergency planning exercise of March 3, 1982? State all opinions and documents on which the position is based, and identify the person or persons who formulated the opinions and/or developed the documents.

43. Is it the State's independent position that the combined off-site emergency plans of the licensees, local and state officials are required to be in full compliance with the emergency planning measures set forth in 10 CFR 50, Appendix E, 10 CFR 50.47 and NUREG-0654, Rev. 1, as a condition of operation for the Indian Point plants?

a.) If yes, does the State believe that the licensees should not be allowed to operate their plants when any component of the emergency plans are not in full compliance?

b.) If no, which planning measures set forth in 10 CFR 50, Appendix E and 10 CFR 50.47, and including each of the criteria set forth in NUREG-0654, Rev. 1, need not be met as a condition of operation, in the opinion of the State?

44. Are there any additional emergency planning requirements the state believes should be imposed upon the Indian Point licensees as a condition of operation? Please list and describe fully.

45. Please indicate upon what independent NY State studies, documents, standards, and criteria the responses to Interrogatories 43 and 44 are based, or whether NY State is relying upon the NRC and/or FEMA positions.

46. Provide copies of any and all documents referred to in the responses to Interrogatory 45.

47. What contacts did NY State have with the utilities and their consultants, EDS Nuclear and Parsons Brincherhoff Quade and Douglass, Inc., who wrote the County portions of the NYSRERP? Please describe these fully, including dates, participants, and content, and provide copies of any and all documents arising out of and about these contacts.

48. What evaluations or reviews of the County portion of the NYSRERP for around Indian Point have been done by NY State, and what person or persons participated in these reviews or evaluations? Were the raw data or computer models for the plans obtained, evaluated and independently verified by NY State? If so, by which person or persons? Please provide all documents used in answering this question.

49. What State Agencies, Groups, Departments, and/or Commissions were or are involved in developing coordinating, and maintaining the NYSRERP?

50. Provide all revisions, appendices, and attachments to the NYSRERP from August, 1981 to date.

51. Continue to provide any further revisions, appendices and attachments to NYSRERP to UCS/NYPIRG throughout current proceeding and until further notice.

52. Provide all contracts and agreements which New York State has entered into with Con Edison, PASNY, Con Edison's and PASNY's consultants, and independent consultants, relating to development, preparation, maintenance, and revision of the NYSRERP.

53. Identify State equipment and personnel available for the following tasks:

- a. Verification of radiological releases.
- b. Monitoring of radiation plume.
- c. Radiation dose assessment.
- d. Communications between State Emergency Operations Center (EOC), and State or other personnel in the field carrying out tasks a-c.
- e. Communications between New York State, the Counties involved and Con Edison and/or PASNY Emergency Operation Facilities.

54. Identify location and condition of all equipment mentioned in Question 53.

55. What is the State's estimated deployment time for the

State's emergency personnel? Please be specific as to areas of responsibility and geographic location, i.e., how long until monitoring teams reach predesignated sites near or far from the plant, how long will it take for full EOC mobilization in Albany or Poughkeepsie, and so forth?

56. What procedures are in place to notify needed state personnel of a radiological emergency at Indian Point?

57. Describe in detail any changes in these procedures that would follow a declaration of a State of Emergency at Indian Point.

58. Provide all New York State responses to the April, 1981 and December, 1981 FEMA Radiological Assistance Committee's Reviews. In response to this interrogatory provide the following:

- a. All revisions to specific portions of NYSRERP which the RAC criticizes.
- b. All documents arising out of any response to or comments upon the RAC Review.

59. What memoranda of understanding or any other type of letter of agreements exist which explains and outlines each NY State Department or agency's role, including responsibilities and personnel involvement, in any radiological emergency? Please attach copies of all such documents. If these memos are not finalized, please outline what problems remain to be resolved.

60. According to the December 31, 1981 REMA RAC Review of

element J.10.1., the RAC noted the NYSRERP's missing Appendix 4, prepared by the licensee's consultant, Parsons Brinckerhoff Quade and Douglass. Assuming that the State has received the consultants work, please forward a copy of the consultant's report, and include any other documents that the State has received from the utilities' consultants.

61. Provide time estimates for the implementation of all recommendations included in the State 708 Report. Identify the source of such estimates by author, publication and date.

62. Delineate each interim measure the State is taking in order to improve its level of preparedness until all of the recommendations from the State 708 Report are implemented.

63. Provide any available time estimates for the implementation of these interim measures. Identify the source of such estimates by author, publication and date.

64. Provide copies of all legislation or drafts of legislation being proposed to facilitate implementation of all recommendations in the State 708 Report.

65. List and describe all recommendations of the State delineated in the 708 Report. Number items in this list according to their relative importance for protecting the public health and safety. Start with the most important recommendation and end with the least important.

66. Which items listed above do the State believe are required in order for the utilities to comply with the NRC Emergency Planning Regulations and Guidelines.

67. Which items listed above does the State believe are necessary to protect the public health and safety.

68. Provide all drafts and documents upon which preparation of the final 708 Report was based.

69. Is it the State's position that a site-specific consequence study is necessary in order to better predict and plan for emergency planning needs for the Indian Point site?

70. Has the State prepared or is it planning to prepare such a study referred to in the above question. Provide a copy of this study, if complete, or state an estimated timetable for accomplishing such a study.

71. Identify all people upon whom the state of New York or its agents relied in the preparation of the 708 Report. The identification should include the following:

- a. What is the person's full name?
- b. What is the person's address?
- c. What is the person's last known position and business affiliation?
- d. What is the person's field of expertise?
- e. If the person is not a state employee, on what date did NY State first contact or consult the person?

- f. What are the dates of all subsequent contacts or consultations with the person?
- g. Were any reports made to NY State by the person?
- h. If the answer to question 71g is anything other than a simple negative, indicate for each such report:
 - (1) the date of the report;
 - (2) whether the report was written or oral; and
 - (3) whether the report was submitted by the person while acting in an advisory capacity, as a prospective witness, or both.
- i. What is the subject matter of the witness' testimony?
- j. What are the facts and/or opinions to which the witness will testify and the grounds for each fact or opinion?

72. Is the State considering adopting extended Emergency Planning Zones in order to protect the population residing beyond the 10 miles from Indian Point?

73. Is it the position of the State that ad hoc emergency procedures would be adequate to protect the health and safety of populations beyond 10 miles of Indian Point?

74. Is it the position of the State that ad hoc emergency procedures would be adequate to protect the health and safety of the population of New York City should an accident occur at Indian Point?

75. Please indicate whether the State is relying upon NRC and FEMA's positions on this matter or has the State undertaken any independent study to determine whether ad hoc procedures would be adequate to protect the health and safety of the population of

New York City. Please supply copies of such studies.

76. Has the State undertaken or does it plan to undertake any systematic study of the New York City's residents in order to determine their likely range of responses in the event of an accident at Indian Point? Provide copies of a such study or planned study.

77. Provide copies of all documents, studies, data, etc. provided by the State to consultants of the licensees for use in the preparation of the emergency plans for Indian Point, including but not limited to data and information pertaining to the road capacity, traffic flows, accident patterns and statistics within and beyond the 10 mile Emergency Planning Zone.

78. Provide all notes, reports, documents relating to preparation for and assessments of drills preceding the Indian Point joint exercise of March 3, 1982.

79. Provide all drafts, letters, documents, etc. used in the State's role in the preparation of the scenario, both on and off-site, for the joint exercise of March 3, 1982.

80. What is the State's position and what has it been on the necessity of sounding the sirens during the exercise of March 3, 1982. What is the State's position on adequacy of post-exercise siren testing?

81. What is the State's position on the adequacy of the

State Emergency Broadcast System's performance during the March 3, 1982 joint exercise?

82. Provide notes, reports, documents, etc. presented in all meetings participated in by the State and its consultants in preparation for and subsequent to the Indian Point exercise of March 3, 1982.

83. What was the total cost to State taxpayers of State officials' and their consultants' participation in all activities relating to the Indian Point exercise on March 3, 1982?

84. What is State's position on improvements needed for future exercises at the Indian Point site?

85. Identify all State personnel and State consultants who participated in or observed the Indian Point exercises of March 3, 1982. Include their credentials and training.

86. What is the State's position on the intervenors' representatives who observed the Indian Point exercise of March 3, 1982, according to the terms of the Atomic Safety and Licensing Board. Include in your response details regarding specific effects on the drill, if any, you attribute to the intervenor observers.

87. What modeled information was used by State participants in the exercise as a basis for protective action decisions for the public including "recovery and re-entry" phases both within and outside the 10 mile zone?

88. What is the State's position on adequacy of public information brochures at the time of the drill? If found inadequate, what is the State's position on improving their content?

89. What was the timetable for alerting and mobilizing State officials and staff in the exercise?

90. What is the State's position on the adequacy of public and media relations as demonstrated in the exercise and if inadequate, what timetable does it propose to educate the press and public?

91. Has the State developed or does it intend to develop any plans for the decontamination of land and property beyond 10 miles in the event that contamination levels following an accident at Indian Point require such measures? Please provide copies of any such plans or procedures, or a timetable for developing such plans and procedures.

92. Has the State developed or does it plan it develop any specific procedures for providing information and instructions to populations beyond 10 miles for use during a radiological emergency at Indian Point? Describe fully and provide all relevant documents.

93. Has the State developed or does the State plan to develop a public education program for populations beyond 10 miles? Describe fully and provide all relevant documents.

94. Does the State intend to develop emergency procedures for radiation monitoring, public education information, and measures to protect the public beyond 50 miles of Indian Point? Describe fully and provide all relevant documents.

95. Please provide full information on the professional qualifications, and relevant training of all individuals with lead responsibilities for developing, maintaining, and carrying out the NYSRERP.

96. With respect to the responses provided by NY State to any of the interrogatories contained in this document, who are the persons upon whose opinions and/or knowledge of facts NY State expects to rely during the Indian Point evidentiary hearings?

97. Identify all individual(s), that you intend to present as witnesses in this proceeding on the subject matter of any of the order's questions. The identification should include the following:

- a. What is the person's full name?
- b. What is the person's address?
- c. What is the person's present or last known position and business affiliation?
- d. What is the person's field of expertise?
- e. If the person is not a state employee, on what date did NY State first contact or consult the person?
- f. What are the dates of all subsequent contacts or consultations with the person?
- g. Were any reports made to NY State by the person?
- h. If the answer to question 97g is anything other than a

simple negative, indicate for each such report:

(1) the date of the report;

(2) whether the report was written or oral; and

(3) whether the report was submitted by the person while acting in an advisory capacity, as a prospective witness, or both.

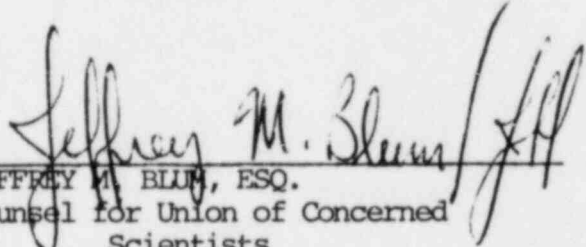
i. What is the subject matter of the witness' testimony?

j. What are the facts and/or opinions to which the witness will testify and the grounds for each fact or opinion?

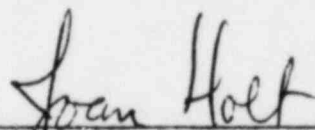
98. Provide a reasonable description of all documents that will be relied upon in the testimony presented by each witness.

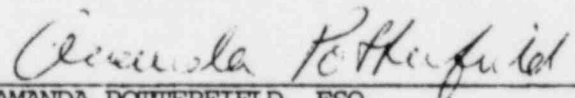
99. Identify by author, title, date of publication and publisher, all books, documents, and papers you intend at this time to employ or rely upon in conducting your cross-examination of prospective NYPIRG/UCS witnesses testifying in connection with NYPIRG/UCS contentions.

Dated: April 30, 1982
New York, New York


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC
'82 MAY -5 NO:51

In the Matter of)

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

Docket Nos. 50-247 SP
50-286 SP

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

May 3, 1982

Certificate of Service

I hereby certify that copies of:

FOE/AUDUBON'S FIRST SET OF INTERROGATORIES AND DOCUMENT
REQUESTS TO NRC STAFF, INDIAN POINT 2 AND 3 LICENSEES
AND THE NEW YORK STATE ENERGY OFFICE

UCS/NYPIRG FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO CON ED AND PASNY

UCS/NYPIRG FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO ROCKLAND COUNTY

UCS/NYPIRG FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO NRC STAFF

UCS/NYPIRG FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO WESTCHESTER COUNTY

UCS/NYPIRG'S FIRST SET OF INTERROGATORIES TO AND REQUEST
FOR DOCUMENTS FROM NEW YORK STATE ENERGY OFFICE, IN ITS
OWN CAPACITY AND AS A REPRESENTATIVE OF ALL OTHER NEW YORK
STATE SUBDIVISIONS, DEPARTMENTS, COMMISSIONS, AGENCIES,
AND CONSULTANTS IN POSSESSION OF THE INFORMATION REQUESTED
HEREIN

has been served on the official minimum service list for the above
captioned proceeding by depositing in the United States mail, first
class, this 3rd day of May, 1982.

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Amanda Potterfield, Esq.

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NUCLEAR REGULATORY COMMISSION

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Docket Nos. 50-247 SP
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Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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