

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 MAY -5 10:50

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

May 1, 1982

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

1. a.) Identify by title, author and date of production all studies, reports, investigations, and other documents produced, consulted or commissioned by you with regard to possible damage to or contamination of the following within a fifty mile radius as a result of a nuclear accident at Indian Point:

- I. Agricultural soils
- II. Recreational lands and wildlife areas
- III. Water supplies, including but not limited to, streams, rivers, reservoirs and wetlands.
- IV. Private and public buildings including but not limited to homes, schools, hospitals, places of worship, businesses and factories.
- V. Means of transport including but not limited to roads, bridges, tunnels, cars, trucks, trains, railways, ships, ports, airplanes and airports.

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- VI. Utility systems and fuel supplies.
- VII. Crops, livestock, packaged and processed foods.
- VIII. Household and consumer goods including but not limited to clothing, furnishings, appliances and personal items.
- IX. Wildlife

b.) For each item listed in response to the request above, please attach a copy if available without charge, or if unavailable, state place and time at which said item may be inspected and copied.

2. a.) Identify by title, author and date of production all studies, reports, investigations or other documents known to you, discussing, proposing or further elaborating upon plans for monitoring the types, levels and geographic extent of radioactive contamination of the materials listed in Interrogatory 1(a) above.

b.) For each item listed in response to request 2(a) above, please attach a copy if available without charge, or if unavailable, state place and time at which said item may be inspected and copied.

3. a.) Describe all medical and scientific procedures considered or proposed by you or any consultants or experts with whom you have communicated or received information that would be used to treat humans who have been exposed to radioactivity or have ingested radioactive materials as a result of an accident at Indian Point.

- b.) Identify specifically the locations, facilities and personnel that would be available for treatment identified in response to 3(a) and indicate as accurately as possible the capacity of such facilities.
 - c.) If documents are cited in response to requests 3(a) or 3(b) above, please append a copy of the relevant pages if available without charge, or provide a concise summary of the pertinent portions of said documents.
- 4.
- a.) Describe all procedures that you or any experts with whom you have communicated have considered or proposed with regard to the decontamination of each of the materials listed in Interrogatory 1(a) above.
 - b.) Identify specifically the equipment that would be available and the personnel that would be responsible for carrying out procedures described in the response 4(a) above.
 - c.) If documents are cited in response to requests 4(a) or 4(b) above, please append a copy of the relevant pages if available without charge, or provide a concise summary of the pertinent portions of said documents.
- 5.
- a.) Identify the location, size and nature of all sites considered or proposed by you or any experts with whom you have communicated for the use of storage or disposal of materials contaminated as a result of an accident at Indian Point.
 - b.) Describe specifically any plans within your knowledge

or under consideration by you or your consultants with regard to:

- I. Transport of contaminated materials to the sites.
- II. Types of structures that would be used for the containment of contaminated materials.
- III. Care and maintenance of the sites.

c.) If documents are cited in response to 5(a) or 5(b) above, please append a copy of the relevant pages if available without charge, or provide a concise summary of the pertinent portions of said documents.

6. a.) Describe all estimates within your knowledge of the time that would be required to decontaminate radioactive objects and sites sufficiently to resume normal use and access by human beings without posing a threat to their health and safety.

b.) If estimates cited in response to request 6(a) above are based upon any studies, reports, investigations or other documents, please append a copy of the relevant pages, or provide a concise summary of the pertinent portions of said documents.

7. a.) Identify by title, author and date of production all studies, reports, investigations and other documents produced, consulted or commissioned by you with regard to:

- I. The difficulties of emergency evacuation posed by the existing network of roadways in Westchester and Rockland counties.
- II. The possibilities of mitigating these difficulties by expanding, improving or upgrading roadways.

b.) For each item listed in response to request 7(a)

above, please attach a copy if available without charge, or if unavailable, state place and time at which said item may be inspected and copied.

c.) For each item listed in response to request 7(a) above, state specifically the page numbers where said difficulties and possibilities are discussed.

8. a.) Identify by name any witnesses you plan to have testify at the hearings with regard to any aspect of on-site or off-site emergency planning procedures, or any other matter pertinent to Commission Questions 3 or 4.

b.) Provide the following information with regard to the witnesses identified in 8(a) above:

I. Address

II. Occupational title

III. Place of employment

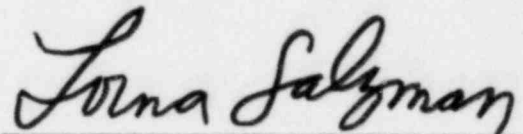
IV. Business address and telephone number

V. Times within your knowledge at which said witnesses will be available for deposition.

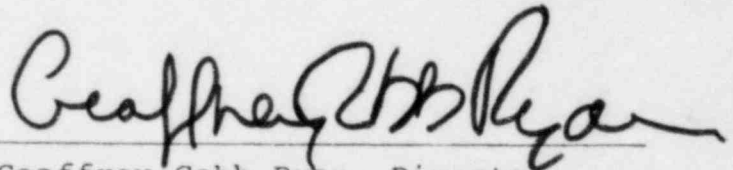
c.) State briefly the matters about which each witness identified in request 8(a) is expected to testify.

May 3, 1982
New York, New York

Respectfully submitted,



Lorna Salzman, Mid-Atlantic Director
Friends of the Earth, Inc.



Geoffrey Cobb Ryan, Director
New York City Audubon Society, Inc.