

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
Louis J. Carter, Chairman
Dr. Oscar H. Paris
Frederick J. Shon

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In the Matter of)

CONSOLIDATED EDISON COMPANY OF)
NEW YORK (Indian Point Unit No.2)

POWER AUTHORITY OF THE STATE OF)
NEW YORK (Indian Point Unit No.3)

Docket Nos.50-247-SP
50-286-SP

May 3, 1982



INTERROGATORIES

OF

ROCKLAND CITIZENS FOR SAFE ENERGY

Pursuant to 10 C.F.R. 2.740, Intervenor Rockland Citizens for Safe Energy (hereinafter referred to as RCSE) requests that these interrogatories be answered fully in writing and under oath by any employees or representatives of Consolidated Edison Company and Power Authority of the State of New York (the Licensees), of the NRC Staff, and of the New York State Energy Office who have personal knowledge of the facts and issues in question. Each of the parties named is requested to answer all of the interrogatory. The answer to each interrogatory should contain the name and identification of each person supplying or contributing to the answer, whether or not he or she has verified the answer. The answer should also explain the role of each individual in preparing the answer.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise indicated, the following definitions shall apply to these interrogatories:

(1.) The Licensees shall include not only Con Edison and the power Authority, but also all agents, employees, attorneys, investigators, contract-

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ors and all other persons directly or indirectly subject to the control of the Licensee, especially including any contractors specifically hired to prepare any emergency planning material.

(2.) The word "person" or "persons" shall mean, without limitation, all entities, including any predecessors in interest, individuals, associations, companies, partnerships, joint ventures, corporations, subsidiaries, departments, bureaus, public agencies and boards.

(3.) "Documents" shall mean all written or recorded material of any kind or character known to the parties or in the possession, custody or control, including, but not limited to letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records of notations of telephone or personal conversations or conferences, interoffice communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, worksheets.

(4.) When used with respect to a document, "identify" means, without limitation, to state its date, type of document, the author and addressee, the present location and custodian, and a description of its contents.

(5.) When used with respect to a person, "identify" means, without limitations, to state his or her name, address, occupation and professional qualifications.

(6.) If any of the information contained in the answer to any of these interrogatories is not within the personal knowledge of the person signing the response to that interrogatory, so state and identify each person, document and communication on which he or she relies for the information contained in the answers not based solely on personal knowledge.

(7.) If the party cannot answer a portion of the following interrogatories in full after exercising full diligence to secure the information to do so, so state and answer to the extent possible specifying the inability to answer the remainder and stating when the party expects to be able to answer the

unanswered portions.

(8.) These interrogatories are continuing interrogatories and require supplemental answers if the party obtains further information between the time the answers are served and the time of an initial decision in this proceeding.

INTERROGATORIES

(1.) Please state the party's position with respect to each of RCSE's contentions 3.1, 3.3, 3.4, 4.2 and 4.7 .

(2.) With respect to each of RCSE's contentions, please

(a.) identify each person whom the party expects to call as an expert witness concerning the contention;

(b.) state the subject matter on which the expert witness is expected to testify;

(c.) state the substance of the fact and opinion to which the expert witness is expected to testify and summarize the grounds for each opinion;

(d.) identify all documents relied upon or examined by the expert witness in answering (c.) above;

(e.) identify all documents not identified in response to (d.) above which the expert witness expects to put into evidence or to rely upon in support of his or her testimony in this proceeding.

(3.) Please identify all other persons whom the party expects to call as witnesses concerning the issues raised by the RCSE contentions and in response to Commission questions 3 and 4. Please answer interrogatory (2.) (a.) through (e.) with respect to each potential witness identified by the party in response to this interrogatory.

(4.) With respect to all persons identified by the party in response to interrogatory (2) and (3) above, please

(a) provide a complete bibliography of all articles, books or

scholarly works published or presented by each person, including a brief description of the substance of each;

(b) identify and provide appropriate citations for all proceedings in which the person has previously appeared as a witness .

(5.) Identify all documents that the party expects to introduce into evidence or to use for impeachment or other cross-examination purposes in this proceeding other than those identified in response to other interrogatories.

(6.) What equipment, manpower and training shortfalls does Rockland County have with respect to compliance with 10 C.F.R. 50.47 b(6) and (7) and NUREG 0654 Sec. II F and II G? What equipment, manpower and training would be needed by Rockland County to comply with 10 C.F.R. 50.47 (b) (6) and (7) and NUREG 0654 Sec. II F and II G? Please identify any and all deficiencies in complying with the evaluation criteria of NUREG 0654 Sec. II F and II G with respect to Rockland County.

(7.) With respect to contention 3.3, please provide a listing of all evacuation plan estimate studies done by CONSAD Research Corporation and Parsons, Brinckerhoff, Quade and Douglas, Inc., and any other time estimate studies done for the Indian Point site, any working papers and documents pertaining to these studies, and updates of the studies, including the date of all such documents and updates. The NRC Staff is requested to provide a copy of the aforementioned documents to RCSE without charge.

(8.) Please identify which version, if any, of the Rockland County Radiological Emergency Response Plan was relied upon in each of the studies or updates. Please identify what studies were made of traffic patterns immediately outside of the 10 mile EPZ and of their effects upon traffic egress from the 10 mile EPZ. Please identify the "level of service" assumptions used in computing the evacuation time estimates in any known studies and the reasoning for selection of those levels of service in Rockland County.

(9.) Please identify all bottlenecks revealed by any evacuation time

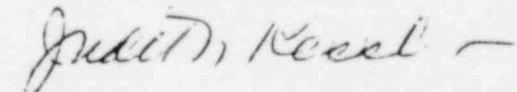
estimate studies done for Rockland. State any time estimates that have been computed regarding traffic flow that does not progress in the optimal manner according to the plan.

(10.) Please state the date and time of any and all events which would be classified as unusual events, site alerts, site emergencies or general emergencies under current regulations in the operating history of Units 2 and 3. For each of the preceding events, state whether and at what exact time Rockland County and others were notified officially of the event and of its nature. Please supply all documents pertaining to the NRC investigation of the October 1980 fan cooler leak accident.

(11.) Please identify any studies on sheltering capability within the EPZ in Rockland County. Please identify any standards known for sheltering factors in radiological emergencies. It is requested that the NRC Staff provide any documents and testimony related to sheltering and air turnover rates in buildings.

(12.) What proportion of the population within the Rockland County EPZ is known to be deaf, blind, too young to understand instructions in the Emergency Planning brochures or unable to speak English? What special provisions have been taken to inform these populations of an emergency?

Respectfully submitted,



Judith Kessler, Coordinator
Rockland Citizens for Safe Energy
May 3, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
Louis J. Carter, Chairman
Dr. Oscar H. Paris
Frederick J. Shon

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POWER AUTHORITY OF THE STATE OF)	
NEW YORK (Indian Point Unit No. 3))	May 3, 1982
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CERTIFICATE OF SERVICE

I hereby certify that I have served copies of INTERROGATORIES OF
ROCKLAND CITIZENS FOR SAFE ENERGY on the following parties by first class
mail, postage paid, this third day of May, 1982:

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Respectfully submitted,



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Rockland Citizens for Safe Energy

Huntsville, Alabama
May 3, 1982