

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

72 JUN 27 1982
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In the Matter of
:
CONSOLIDATED EDISON COMPANY OF NEW YORK, : Docket Nos.
INC. (Indian Point, Unit No. 2) : 50-247 SP
: 50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK :
(Indian Point, Unit No. 3) : May 24, 1982
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LICENSEES' RESPONSES TO INTERROGATORIES OF
FRIENDS OF THE EARTH/NEW YORK CITY AUDUBON SOCIETY

ATTORNEYS FILING THIS DOCUMENT:

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S/O/I

PRELIMINARY STATEMENT

Consolidated Edison Company of New York, Inc., ("Con Edison"), licensee of Indian Point Station, Unit No. 2, and Power Authority of the State of New York (the "Power Authority"), licensee of Indian Point 3 Nuclear Power Plant (collectively the "licensees"), submit these responses to the "Interrogatories of Friends of the Earth/New York City Audubon Society ("FOE/Audubon")." The following are general comments or objections applicable to interrogatories of FOE/Audubon.

A. Emergency Planning Responsibilities

The FOE/Audubon interrogatories in many instances reflect a fundamental misapprehension as to the various responsibilities for radiological emergency planning both generically and at Indian Point in particular. Although the Commission ultimately maintains licensing jurisdiction over nuclear power plants, the licensees' responsibility for and jurisdiction over emergency planning terminates at the site boundary. Pursuant to State law and consistent with federal regulations, the State of New York maintains primary responsibility for offsite radiological emergency planning (see N.Y. Executive Law, Art. 2-B). Radiological emergency response plans and procedures ("RERP's" or "plans") for the four counties surrounding Indian Point are annexed to the State plan.

Accordingly, many of the interrogatories relating to offsite emergency planning were misdirected to the licensees. The information sought, if available, would be more appropriately

obtained from the governmental authorities responsible for off-site emergency response.

Nevertheless, much of the information sought may be found in the offsite emergency plans themselves, with which the licensees are familiar. Accordingly, where information is known on such a basis, we have attempted in an effort to expedite discovery to respond to the interrogatories concerning those plans, primarily by reference to portions of the plans.* We continue to note, however, that the offsite authorities are more appropriate sources for this type of information.

* This approach is analogous to the general principle of responding to interrogatories, which permits reference to documents as an answer where the answer may be derived or ascertained from such documents. See, e.g., Fed. R. Civ. P. 33(c), which states:

Option to Produce Business Records. Where the answer to an interrogatory may be derived or ascertained from the business records of the party upon which the interrogatory has been served or from an examination, audit or inspection of such business records, including a compilation, abstract or summary thereof, and the burden of deriving or ascertaining the answer is substantially the same for the party served, it is a sufficient answer to such interrogatory to specify the records from which the answer may be derived or ascertained and to afford to the party serving the interrogatory reasonable opportunity to examine, audit or inspect such records and to make copies, compilations, abstracts or summaries. A specification shall be in sufficient detail to permit the interrogating party to locate and to identify, as readily as can the party served, the records from which the answer may be ascertained.

B. Document Production

In a number of instances FOE/Audubon has served interrogatories which are, in effect, requests for production of documents. We note that while 10 CFR § 2.740(b) requires responses to interrogatories within 14 days, 10 CFR § 2.741 allows 30 days for responses to document requests.* Accordingly, the licensees do not intend to produce documents or make objections, except as otherwise specified, at this time. We are prepared, while reserving any claims of privilege or other objections to such production, to consider a future time and location for the production of documents, in accordance with 10 CFR Part 2 and the convenience of the parties. In fact, since the licensees believe that documents FOE/Audubon has requested may also be encompassed by other intervenors' document requests, it may be in the interest of all parties to coordinate such requests.

* Of course, where the due date for document production lies beyond the Board's May 31, 1982 date for close of discovery under Commission Questions 3 and 4, the May 31 date should control.

RESPONSES TO INTERROGATORIES

1. INTERROGATORY:

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.
- 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.

RESPONSE:

The modes of possible damage to or contamination of plant surroundings are in general not unique to the Indian Point site and were considered by the NRC(AEC) on a generic basis in formulating the siting review criteria for all nuclear plants. The application of these criteria to Indian Point was based on the specific hydrology and land use characteristics in the vicinity of the site. It is impossible to specify all documents of this sort "consulted" by licensees.

The following are the principal documents that were produced, consulted or commissioned by the licensees with regard to possible damage or contamination as a result of a nuclear accident at Indian Point:

State Emergency Plan

Part 1 - Section III - Subsections 5 and 6
Part III - Section I - Procedure G - "Radio-
logical Exposure Control Procedures"

IP -2 Site Emergency Plan

Section 6
Procedures:
IP-1011 Repair and Corrective Action
IP-1038 Emergency Personnel Exposure

IP -3 Site Emergency Plan

Section 6
Procedures:
IP-1025 - Repair and Corrective Action Teams
IP-1027 - Emergency Personnel Exposure

County Emergency Plans (Westchester, Putnam,
Orange, Rockland)

Volume 1 - Section III. H. 6 - Isolation of
Ingestion Pathways and Sources
Volume 2 - Section 3 - Health

Other Documents

IP-2 Final Safety Analysis Report, Docket No.
50-247
IP-3 Final Safety Analysis Report, Docket No.
50-286
IP-2 Environmental Report, Docket No. 50-247
IP-3 Environmental Report, Docket No. 50-286
*Hine, G. J. and Brownell, G. L., editors,
Radiation Dosimetry, Academic Press 1956
*Morgan, K. Z., and Turner, J. E., editors,
Principles of Radiation Protection, John
Wiley & Sons, Inc. 1967
*Booth, R. S., and Kaye, S. J., "A Preliminary
System Analysis Model of Radioactivity
Transfer to Man from Deposition in a

Terrestrial Environment", ORNL-TM-3135,
Oak Ridge National Laboratories,
Oak Ridge, Tennessee (1971)
U.S. Department of Agriculture,
Agriculture Statistics Annual

1. INTERROGATORY:

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

RESPONSE:

Asterisked documents will be produced by the Licensees. See page 4 concerning the production of documents. Other documents may be inspected and copied at the White Plains Public Library.

2. INTERROGATORY:

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 the Interrogatory 1(a) above.

RESPONSE:

Licensees' capability for monitoring the area around the Indian Point nuclear power plants for released radioactivity, for following and predicting its movement and spread, and for assessing its potential health hazard is addressed in Appendix H of the Indian Point Site Radiological Emergency Response Plans. Additional monitoring and assessment to be performed by qualified county and state personnel is described in Section III of the counties' response plans.

The following documents discuss, propose or further elaborate upon plans for monitoring the types, levels and geographic extent of radioactive contamination of the materials listed in Interrogatory 1(a) above.

Specific references are as follows:

State Emergency Plans

Part I - Section III - Subsections 5 and 6
Part III - Section I - Procedure G - Radiological
Exposure Control Procedures

IP-2 Site Emergency Plan

Section 6.2
Procedures:
IP-1013 Recommendation of Protective Actions
for Offsite Population
IP-1004 Post Accident Offsite Environmental
Surveys, Sampling and Counting

IP-1006 Site Perimeter Surveys
IP-1042 In-Plant Radiological Surveys and
Sampling
IP-1015 Mobilization and Operational Procedure
for Offsite Monitoring Teams-Immediate
Response
IP-1034 Mobilization and Operational Procedure
for Offsite Monitoring-Supplemental
Response
IP-1020 Airborne Iodine-131 Determination Using
SAM-2/RD-22 or RM-14/HP-210

IP-3 Site Emergency Plan

Section 6.3 Procedures:

IP-1017 - Recommendation of Protective Actions
for Offsite Population
IP-1018 - Post Accident Environmental Sampling
and Counting
IP-1010 - In Plant/Site Perimeter Survey
IP-1011 - Offsite Monitoring Team
IP-1015 - Airborne Iodine - 131 Determination
Using SAM-s/RD-22 or RM-14/HP-210

County Emergency Plans

Volume 1 - Section III. G. - Assessment and
Evaluation of Protective Action Response Options
- Appendix J. - Nuclear Environmental
Monitoring System

Volume 2 - Section 3 - Health
- Section 14 - Radiological Equipment*

*Putnam County Plan has Section 13 as Radiological
Equipment.

Other Documents

IP-2 - Final Safety Analysis Report,
Docket No. 50-247
IP-3 - Final Safety Analysis report,
Docket No. 50-286
IP-2 Environmental Report, Docket No. 50-247
IP-3 Environmental Report, Docket No. 50-286

2. INTERROGATORY:

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 item may be inspected and copied.

RESPONSE:

These documents may be inspected and copied at the White Plains Public Library.

3. INTERROGATORY:

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.

RESPONSE:

Medical and scientific procedures for treating onsite personnel who may have been exposed to radioactivity or who may have ingested radioactive materials as a result of an accident at Indian Point are discussed in the following documents. These procedures have been considered or proposed by the licensees or consultants or experts with whom the licensees have communicated.

IP-2 Site Emergency Plan

Plan-Appendix D

Procedures:

- IP-1012 On-site Medical Emergency
- IP-1008 Personnel-Radiological Check
and Decontamination
- IP-1005 Use of SAM-2/RD-22 to Determine
Thyroid Burdens

IP-3 Site Emergency Plan

Plan - Appendix D

Procedures:

- IP-1012 - Radiological Medical Emergency
- IP-1022 - Transport of Contaminated Injured
Personnel Between Units 3 and 1
- IP-1060 - Personnel Radiological Check and
Decontamination
- IP-1065 - Use of SAM 2/RD-22 to Determine
Thyroid Burdens

Other Documents

- IP-2 - Environmental Report, Docket No. 50-247
- IP-3 - Environmental Report, Docket No. 50-286
- ICRP 28, "Principles and General Procedures for

Handling Emergency and Accidental Exposure of
Workers", Pergamon Press, Annals of ICRP Vol.
2, No. 1, 1978
NCRP No. 65, "Management of Persons Accidentally
Contaminated With Radionuclides"

3. INTERROGATORY:

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.

RESPONSE:

1. Con Edison clinic and decontamination suite at Indian Point 1 and 2.
2. Power Authority decontamination suite at Indian Point 3.
3. Peekskill Community Hospital (PCH) 114 beds
180 Crompond Road
Peekskill, New York 10566
4. Northern Westchester Hospital (NWH) 250 beds
400 East Main Street
Mount Kisco, New York 10549
5. Brookhaven National Laboratories
Associated Universities Inc.
Upton, New York 11973

3. INTERROGATORY:

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.

RESPONSE:

These documents, with the exception of ICRP 28 and NCRP No. 65, are available for inspection and copying in the White Plains Public Library. ICRP 28 and NCRP No. 65 will be produced by the Licensees. See page 4 above concerning production of documents by licensees.

4. INTERROGATORY:

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 responses to 4(a) above.

RESPONSE:

The methods and degree of decontamination necessary will vary greatly depending on the postulated level of contamination and the structures, items and portions of the environment involved. While it is not within the jurisdiction of the licensees to specify and implement decontamination procedures dealing with public properties or private properties outside the licensees' control, we would expect that a large percentage of the area postulated to be contaminated would be at a very low concentration such that dispersion and removal by natural environmental and decay processes would be sufficient and appropriate.

The following documents describe such procedures.

IP-2 Site Emergency Plan

See response to number 1(a), 2(a), and 3(a) plus Procedures:

IP-1009 Radiological Check and Decontamination of Vehicles

IP-1017 Issuance and Use of Radiological Equipment Stored in the Command Guard House

IP-3 Site Emergency Plan

See response to numbers 1(a), 2(a) and 3(a) plus Procedures:

IP-1063 - Vehicle Radiological check and

Decontamination
IP-1079 - Issuance and Use of Radiological Equip-
ment Stored in Command Guard House

County Emergency Plans

See response to numbers 1(a), 2(a) and 3(a)

4. INTERROGATORY:

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.

RESPONSE:

These documents may be inspected and copied at the White Plains Public Library.

5. INTERROGATORY:

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.

RESPONSE:

All radioactivity contaminated materials must be stored, handled, transported and disposed of in compliance with current NRC and DOT regulations. Storage/disposal must be at an approved licensed site. Regulations addressing disposal of such material are now being revised and will soon be published as 10 CFR Part 61. There are now three licensed sites in the States of Washington, South Carolina and Nevada. Subsequent to January 1, 1986, siting of such shallow land burial sites will be on a regional basis thus, at that time or shortly thereafter, a low level radioactive waste burial site will be available in the northeast part of the country. Licensing of the site in compliance with 10 CFR Part 61 will assure proper structures for possible storage and care and maintenance of the sites.

5. INTERROGATORY:

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 site.

RESPONSE:

See response to 5(a) above. With regard to transport of radioactive materials, 10 CFR Part 71 and applicable Department of Transportation regulations apply.

5. INTERROGATORY:

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.

RESPONSE:

Not applicable.

6. INTERROGATORY:

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.

RESPONSE:

We are not aware of any generic or Indian Point specific estimates addressing time requirements for decontamination. Such estimates would require a great many assumptions and, therefore, would probably be of very limited value. The time required to reduce any contamination encountered to acceptable levels will be strongly incident-specific and will be highly dependent on the proposed schedule for decontamination and acceptance criteria.

6. INTERROGATORY:

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.

RESPONSE:

Not applicable.

7. INTERROGATORY:

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 number where said difficulties and possibilities are discussed.

RESPONSE:

The evacuation time estimates prepared by Parsons Brinckerhoff took into account the existing roadway network. No studies or reports have been prepared with regard to the difficulties of emergency evacuation posed by the existing network of roadways in Westchester and Rockland counties. Similarly, no reports or studies have been prepared with regard to the possibilities of mitigating any such difficulties by expanding, improving or upgrading roadways.

8. INTERROGATORY:

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.

RESPONSE:

See Licensees' Response to UCS/NYPIRG Interrogatory Number 1. With regard to item 8(b)V above, Licensees believe that depositions are neither contemplated nor useful in a proceeding of this sort.

As to Answers:

CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.

By Richard P. Remshaw
Richard P. Remshaw
Project Manager - Indian Point
Hearings

POWER AUTHORITY OF THE STATE
OF NEW YORK

By Herschel Specter
Herschel Specter *Sms*
Protect Manager - Indian Point
Hearings

As to Objections:

CONSOLIDATED EDISON COMPANY OF
NEW YORK INC.

By Brent L. Brandenburg
Brent L. Brandenburg
Assistant General Counsel

POWER AUTHORITY OF THE STATE OF
NEW YORK

MORGAN ASSOCIATES, CHARTERED

By Joseph J. Levin, Jr.
Joseph J. Levin, Jr. *Sms*

SHEA & GOULD

By David H. Pikus
David H. Pikus *Sms*

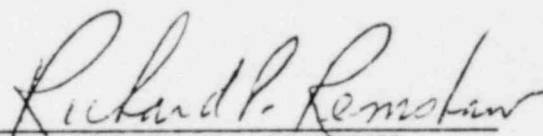
Attorneys for Power Authority
of the State of New York

VERIFICATION

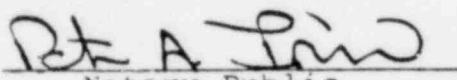
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

RICHARD P. REMSHAW, being duly sworn, deposes and
says:

That he is the Project Manager - Indian Point Hearings
for Consolidated Edison Company of New York, Inc., licensee
of Indian Point Nuclear Generating Station, Unit No. 2; that
he is authorized to make this verification on behalf of said
corporation; and that the foregoing answers to interrogatories
were prepared under his direction and supervision and are true
and correct to the best of his knowledge, information and
belief.


RICHARD P. REMSHAW

Sworn to before me this
24th day of May, 1982


Notary Public
PETER A. IRWIN
Notary Public, State of New York
No. 31 4509945
Qualified in New York County
Term Expires March 30, 1983

VERIFICATION

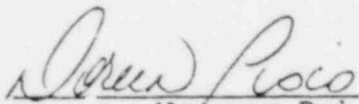
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

HERSCHEL SPECTER, being duly sworn, deposes and
says:

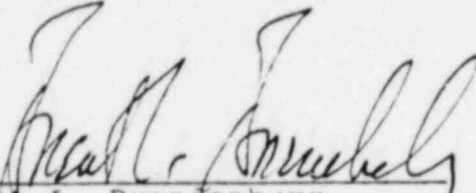
That he is the Manager, Indian Point 3 Hearings,
Technical Support for Power Authority of the State of New
York, licensee of Indian Point 3 Nuclear Power Plant; that
he is authorized to make this verification on behalf of said
Authority; and that the foregoing answers to interrogatories
were prepared under his direction and supervision and are
true and correct to the best of his knowledge, information
and belief.


HERSCHEL SPECTER

Sworn to before me this
24th day of May, 1982.

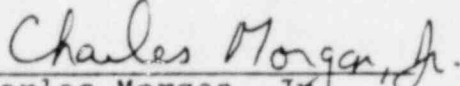

Notary Public

DOREEN PISCO
Notary Public, State of New York
No. 4737373
Qualified in Westchester County
Term Expires March 30, 1983


Brent L. Brandenburg

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Licensee of Indian Point
Unit 2
4 Irving Place
New York, New York 10003
(212) 460-4600

Respectfully submitted,


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Dated: May 24, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

72 MAY 27 1982
WEA

Before Administrative Judges:
Louis J. Carter, Chairman
Frederick J. Shon
Dr. Oscar H. Paris

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CONSOLIDATED EDISON COMPANY OF :
NEW YORK, INC. (Indian Point, : Docket Nos. 50-247-SP
Unit No. 2) : 50-286-SP
POWER AUTHORITY OF THE STATE OF : May 24, 1982
NEW YORK, (Indian Point, :
Unit No. 3) :
- - - - - x

CERTIFICATE OF SERVICE

I certify that I have served copies of the "Licensees'
Responses to Interrogatories of Friends of the Earth and New
York City Audubon Society on the following parties by
first class mail, postage prepaid, this 24th day of May 1982.

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U.S. Nuclear Regulatory
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Washington, D.C. 20555

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Atomic Safety and Licensing
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Greater New York Council on Energy
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Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Richard L. Brodsky
Member of the County Legislature
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County Office Building
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Pat Posner, Spokesman
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Indian Point
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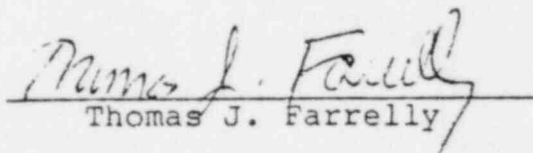
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Judith Kessler, Coordinator
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