

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)

Docket Nos. 50-247 SP  
50-286 SP

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

May 29, 1982

WEST BRANCH CONSERVATION ASSOCIATION INTERROGATORY TO  
THE LICENSEES

WBCA-51-4 Judge Carter in the Order of April 23 suggested  
that discovery shall continue, see footnote 5/, p.22 23.

Licensee's response of May 18 to UCS/NYPIRG  
#88, p.77, shows a probability higher than anything in  
WASH-1400. The Preliminary Report "Review and Evaluation  
of Zion Probablistic Safety Study" by Sandia Lab., let-  
ter of transmittal of March 5, 1982 to the NRC, in Sec-  
tion 5 page 5-1 shows a chart of many various possible  
accidents. No meltdown accident has the probability  
of  $10^{16}$  or any number close to it. A meltdown on that  
chart might be  $4.2 \times 10^{-5}$  and the total for the critique  
at the bottom of the columns is  $1.3 \times 10^{-4}$ . Please ex-  
plain the methodology used to arrive at any higher figure  
and also for the one in Licensees reply #88.

for West Branch Conservation Association  
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914/634-2327

*Zipporah S. Fleisher*  
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Zipporah S. Fleisher  
Secretary

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

In the Matter of

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NEW YORK, INC. (Indian Point,  
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CERTIFICATE OF SERVICE

This is to certify that I have placed in the first class  
mails on May 29, 1982, to all parties in above captioned  
case copies of ADDITIONAL WITNESS LIST, A HEARING SCHEDULE  
REQUEST and an INTERROGATORY REQUEST REPEATED from May 3 & 23.

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