

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'82 JUN -1 AIO:43

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Louis J. Carter, Chairman

Dr. Oscar H. Paris

Frederick J. Shon

OFFICE OF RECORDS
DOCKETING & SERVICE
BRANCH

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In the Matter of:

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

Docket Nos. 50-247 SP
50-286 SP

April 26, 1982

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

-----X
UCS/NYPIRG SUPPLEMENTARY INTERROGATORIES TO
CON EDISON AND PASNY

The New York Public Interest Research Group, Inc. (NYPIRG) and the Union of Concerned Scientists (UCS) serve on Con Edison and PASNY the interrogatories and requests for production of documents that appear below. A sworn response to them must be provided to NYPIRG at 9 Murray Street, New York, New York in accordance with the terms of 10 CFR §2.740(b) and 2.741(d) and in accordance with the Board's Order of April 23, 1982 and the Mailgram of May 12, 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.

The definitions listed on pp. 1-2 of UCS/NYPIRG First Set of ~~Interrogatories~~ and Request for Production of Documents to Con Edison and PASNY apply herein.

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1.S. Referring to Fig. 22-25 of the November Draft Report provided to UCS/NYPIRG in informal discovery ("Parsons Brinckerhoff Quade and Douglas, Inc., Draft Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone, November 1981"), ~~please provide the rates of evacuation (percentage of evacuees vs. time)~~ for other scenarios, sectors or ERPA'S ~~calculated but not included in the~~ November Draft Report.

2.S. The Parsons Brinckerhoff Draft Reports provide the number of P.C.E.'s evacuated as a function of the scenario of a winter, weekday evening. Please provide the number of P.C.E.'s evacuated as a function of scenario, and of course, zone for other times, especially during a daytime, school in session, scenario. Please provide the assumptions on which the calculations are based, especially the assumptions about the availability of buses and how many ~~buses~~ are expected to make multiple trips.

3.S. Are there changes ~~in terminal times~~ as a function of scenario?

4.S. Referring to Appendix D, ~~please provide the physical~~ characteristics of the rest, the northern half, ~~of the~~ network.

5.S. Referring to Appendix E, please provide a schematic of the rest of the network, that part not indicated in the Appendix.

6.S. Referring to Appendix F, please provide traffic signals for the rest of the network.

7.S. Referring to Appendix H, please provide the traffic zone trip data, (including terminal times, P.C.E. rates) for the rest of

the network.

8.S. Please provide the zonal Evacuation Routes for the rest of the network not indicated in Appendix L.

9.S. Please ~~provide~~ provide the equivalent of Appendix M to the January 1981 Draft Report ("Parsons Brinckerhoff Quade and Douglas, Inc. ~~Draft Methodology to Estimate Roadway Travel Times During Evacuation,~~ January, 1981), for the rest of the network.

10.S. Please provide the names of and biographical data for behavioral and/or social scientists who participated in preparation of the Parsons Brinckerhoff reports and draft reports relating to the Indian Point nuclear power plants.

11.S. Please provide all meteorological information about Indian Point, including but not limited to precipitation frequency, wind persistence, dominant wind trajectories, wind speed and direction data, wind rose data, snowfall data (including amounts, frequency and duration), and other data considered in the preparation of the ~~Parsons~~ Brinckerhoff evacuation time estimate reports and draft reports.

12.S. Please provide all documents ~~evaluating~~ the accuracy of radiation dose projections systems and/or radionuclide concentration predictions systems, including but not limited to MIDAS and ARAC.

13.S. Please provide all documents in your possession or available to you or to Parsons Brinckerhoff discussing the use of sheltering as a protective response for radiological emergencies.

14.S. Please provide all documents in your possession or available to you or to Parsons Brinckerhoff discussing the extent to which performance in an actual radiological emergency can be predicted based upon

emergency drills and exercises.

15.S. Please provide all sensitivity and/or parametric studies performed on evacuation time estimate methodologies or computer programs and correspondence related to such studies.

~~16.S. Please provide all documents in your possession or~~
~~available to you or to Parsons Brinckerhoff discussing the impact of meteorological factors on evacuation times and evacuation time estimates.~~

17.S. Please provide all documents in your possession or available to you or to Parsons Brinckerhoff discussing the impact of topography on diffusion of plumes during nuclear accidents.

18.S. Please provide all documents in your possession or available to you or to Parsons Brinckerhoff discussing any form of limitation on evacuation times, whether a maximum or minimum limitation.

19.S. Please provide all documents ~~in your possession or~~
in the possession of Parsons Brinckerhoff, or available to you or to Parsons Brinckerhoff, discussing the establishment of the Plume Exposure Pathway EPZ and Ingestion Exposure Pathway EPZ at Indian Point.

20.S. Please make available for inspection and copying all documents listed in Con Edison's List of Documents Related to the March 3, 1982 Emergency Planning Exercise dated May 10, 1982 and in the Power Authority's Filing Pursuant to the March 10 and April 8 Orders dated May 10, 1981.

Dated: New York, New York
May 26, 1982

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
JUN 1 1982

'82 JUN-1 10:45

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CONSOLIDATED EDISON COMPANY OF NEW YORK) Docket Nos. 50-247 SP
(Indian Point Unit 2)) 50-286 SP
)
POWER AUTHORITY OF THE STATE OF NEW YORK)
(Indian Point Unit 3)) May 28, 1982

Certificate of Service

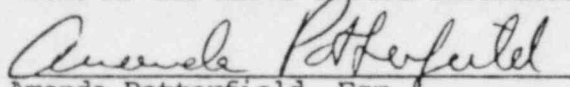
I hereby certify that copies of:

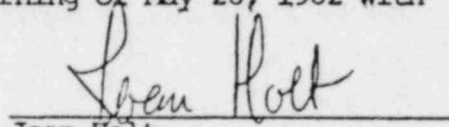
UCS/NYPIRG SUPPLEMENTARY INTERROGATORIES TO CON EDISON
AND PASNY

UCS/NYPIRG MOTION TO COMPEL DISCOVERY PURSUANT TO 10 C.F.R.
2.740(f) and MEMORANDUM IN SUPPORT OF MOTION TO COMPEL DISCOVERY

FOE/AUDUBON SUPPLEMENTAL RESPONSE TO LICENSEES' REQUEST
FOR THE PRODUCTION OF DOCUMENTS

have been served on the official minimum service list for the above
captioned proceeding by depositing in the United States mail, first class,
this 28th day of May 1982. The judges of the Atomic Safety and
Licensing Board were each mailed a copy of the UCS/NYPIRG Motion to Compel
and Memorandum in Support of Motion to Compel Discovery by Express Mail on
May 27, 1982. Mr. Brandenburg for Con Edison and Mr. Pikus of Shea and
Gould for PASNY were served by hand on the morning of May 28, 1982 with
each of the above listed documents.


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF THE
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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

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Atomic Safety and Licensing
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