

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSIONERS

Nunzio J. Palladino, Chairman
Victor Gellinsky
John F. Ahearne
Thomas M. Roberts
James Asselstine

and

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Louis J. Carter, Chairman
Oscar H. Paris
Frederick J. Shon

In the Matter of	x	
	x	
	x	Docket Nos.
CONSOLIDATED EDISON COMPANY OF NEW YORK	x	
(Indian Point Unit 2)	x	50-247 SP
	x	50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK	x	
(Indian Point Unit 3)	x	June 8, 1982
	x	

FOE/AUDUBON AND WESPAC'S RESPONSE IN
SUPPORT OF UCS/NYPIRG MOTION FOR RE-
CONSIDERATION OF COMMISSION RULING
ALLOWING INTERIM OPERATION AND FOR
ISSUANCE OF A SHOW CAUSE ORDER AGAINST
LICENSEE'S, AND FOE/AUDUBON AND WESPAC'S
PRESENTATION OF ADDITIONAL NEW EVIDENCE

1. On June 4, 1982, the Union of Concerned Scientists (UCS) and the New York Public Interest Research Group (NYPIRG) moved for reconsideration of the Commission's ruling permitting interim operation of Indian Point Units 2 and 3 pending the outcome of the Atomic Safety and Licensing Board investigation, and for issuance of a show cause order against the Licensee's, prior to commencement of the evidentiary portion of the investigation. In their submission, UCS/NYPIRG presented new evidence of deficiencies in emergency planning for the Indian Point nuclear power plants. Friends of the Earth, Inc. (FOE), the

New York City Audubon Society(Audubon), and Westchester Peoples Action Coalition(WESPAC) are filing this response in support of UCS/NYPIRG's motion. In addition, FOE/Audubon and WESPAC present further new evidence of emergency plan deficiencies which have come to light since filing of the UCS/NYPIRG motion.

2. The Nuclear Regulatory Commission (Commission) in its order of January 8, 1981, which set the course for this proceeding and permitted interim operation of the Indian Point nuclear power plants, declared that when new evidence warranted interim relief, a different course of action in this proceeding could be ordered. Order of January 8, 1981 at p.3. FOE/Audubon and WESPAC are in agreement with UCS/NYPIRG that the new evidence submitted by the latter parties demonstrates a woeful lack of emergency preparedness at Indian Point. The serious deficiencies in the Indian Point emergency plans described by the Regional Assistance Committee (RAC) of the Federal Emergency Management Agency (FEMA) in April and December of 1981 lead to the inescapable conclusion that there is no assurance that appropriate protective measures can and will be taken in the event of a radiological emergency at Indian Point. Furthermore, local emergency plans are clearly inadequate and incapable of implementation, as emphasized by the formal rejection on May 18, 1982 of the Rockland County Radiological Emergency Response Plan (CRERP) by the Rockland County Legislature.

3. The evidence presented by UCS/NYPIRG would in itself be more than sufficient to warrant interim shutdown of the Indian Point nuclear power plants and issuance of a show cause order. But new information just made available portrays a situation far more grave than previously apparent. On March 3, 1982, a joint exercise of the emergency preparedness plans for Indian Point was held. Participating in the exercise were the Power Authority of the State of New York, owner of Indian Point Unit 3, and officials and agencies of the State of New York, and the Counties of Westchester, Rockland, Orange, Putnam and Dutchess. Findings were reported to FEMA which, on June 4, 1982 released its "Post Exercise Assessment," dated May 27, 1982. The Assessment reported that "Among the four counties, nine functional areas were evaluated as weak." Post Exercise Assessment, at p.9-10. (a copy of the Executive Summary of the Assessment is annexed hereto as Appendix A) These substantial and significant deficiencies underscore the fundamental and overwhelming degree of inadequacy of the emergency plans and the broad failure to meet the mandatory standards of 10 C.F.R. §50.47.

Among the deficiencies reported by FEMA are:

- weakness in the means of alerting the public to a serious radiological emergency, in non-conformity with 10 C.F.R. §50.47 (b)(6). Sirens did not sound or were inaudible to residents. The backup system of notification by sound trucks was not even tested. There was a lack of public understanding of the meaning of the sirens, and a lack of notification of transients.
- weakness in the public education program in non-conformity with 10 C.F.R. §50.47(b)(7). Public education pamphlets were

ineffective. The public as a whole lacked knowledge of radiological emergency preparedness, and, in particular were uninformed about protective actions and ERPA zones. Awareness of the emergency procedures by the non-English speaking population was not demonstrated.

- the minimal extent of participation by Rockland County's police, fire and volunteer ambulance corps demonstrates the lack of success of the exercise in assessing the capability of the second largest county to meet the standards set forth in 10 C.F.R. §50.47(b).

- weakness in recovery and reentry procedures for Orange County in non-conformity with 10 C.F.R. §50.47(b) (13).

- weakness of Westchester County's health, medical and exposure control capabilities in non-conformity with 10 C.F.R. §50.47(b) (12).

- weakness in accident assessment capabilities for Rockland County and deficiencies elsewhere, in non-conformity with 10 C.F.R. §50.47(b) (9).

- inadequate backup for two key people in Putnam County, the CD Director and radiological defense (RADEF) officer, in non-conformity with 10 C.F.R. §50.47(b) (1).

- weakness in emergency operations facilities and capacity for alerting and mobilizing staff in Rockland County in non-conformity with 10 C.F.R. §50.47(b) (5) and (8).

- weakness in 24 hour capability to determine exposure of emergency workers in Westchester County in non-conformity with 10 C.F.R. §50.47(b) (11).

- serious deficiencies in communications capabilities among state and local emergency response facilities in non-conformity with 10 C.F.R. §50.47(b)(6)

These observations are just a sample of the range of serious deficiencies that exist in emergency preparedness as revealed by the FEMA Post Exercise Assessment. But they do demonstrate that the emergency plans are basically inadequate and incapable of implementation. These are not deficiencies which can be corrected through remedial action procedures. If effective emergency preparedness is at all possible, at a minimum, fundamental revision of the plan itself is a stark necessity.

4. The information contained in the letter of June 2, 1982 from Alfred Del Bello, Westchester County Executive, to Commission Chairman Palladino, and in the departmental comments attached to his letter, provide further evidence that major deficiencies in emergency preparedness exist in Westchester County. County Executive Del Bello stated that his transportation professionals are of the opinion that evacuation plans will not work as currently drafted. Letter, p.2. The County Executive also indicated that funding for radiological equipment, training, and communications systems needed to make the potentially workable aspects of the plan implementable in fact, is "grossly inadequate." These are only two major deficiencies among those reported in these materials.

5. The sum of this new evidence and that presented to the Commission by UCS/NYPIRG patently warrant a changed course of action in this proceeding. Continuation of the evidentiary

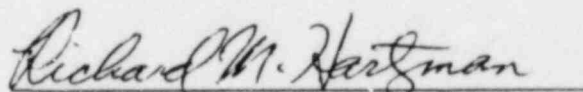
hearing without a show cause order will be redundant and wasteful, and will unnecessarily delay a definitive decision by the Commission. While it is our contention that no feasible emergency measures can protect against the long term consequences of a serious accident at Indian Point, it is now crystal clear that the responsible parties have repeatedly failed to meet their obligations under existing emergency regulations to develop effective plans to deal with the immediate exigencies of an accident at Indian Point. Further "preliminary" investigative hearings are unnecessary to demonstrate the inadequacies and dangers at Indian Point. The known facts compel issuance of a show cause order and interim suspension of operations at the power plants.

6. Nor can the triggering of the 120 day clock be expected to remedy the lack of emergency preparedness. This mechanism was used once without any results, as borne out by the December 31, 1981 RAC Review, the May 27, 1982 FEMA Post Exercise Assessment, the rejection of emergency plans by Rockland County, and the submissions of Westchester County Executive Alfred Del Bello. This evidence irrefutably demonstrates that the August 24, 1981 NRC conclusion that deficiencies in Indian Point emergency plans had been "resolved satisfactorily," was mistaken and misguided. To try the 120 day clock a second time in the face of continuing deficiencies which render the emergency plans fundamentally inadequate and incapable of implementation, would be to disregard the long delayed and immediate need for providing for the safety of those living and

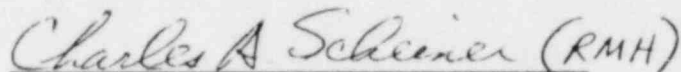
working in the vicinity of Indian Point. This situation can only be remedied through a show cause order and interim shutdown of the Indian Point nuclear power plants.

WHEREFORE, FOE/Audubon and WESPAC request, in support of the UCS/NYPIRG motion, and upon the basis of the additional new evidence presented herein, that the Commission issue an order to show cause why the licenses for Indian Point Units 2 and 3 should not be revoked, and directing the interim suspension of the operation of said nuclear power plants.

Respectfully submitted,



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Dated: June 8, 1982

POST EXERCISE ASSESSMENT



Exercise of the New York State and
Westchester, Putnam, Rockland and Orange
Counties Radiological Emergency Plans for
INDIAN POINT NUCLEAR GENERATING STATION

MAY 27, 1982

Federal Emergency Management Agency
Region 2

FRANK P. PETRONE
Regional Director

26 FEDERAL PLAZA
New York, N.Y. 10278

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
1. FEMA Responsibilities	1
2. Exercise Event.	2
3. Exercise Objective.	2
4. Participating State and Local Organizations	4
5. Exercise Critique	6
6. RAC Evaluation Objectives	6
7. Federal Observer Team	6
8. Evaluation Criteria	8
9. Remedial Action Procedures.	8
10. Review and Approval Procedures.	9
II. EXECUTIVE SUMMARY.	10
1. Overview.	10
2. Summary: State Activities.	11
3. Summary: Indian Point Emergency Operating Facility	12
4. Summary: Westchester County.	13
5. Summary: Rockland County	14
6. Summary: Orange County	15
7. Summary: Putnam County	17
III. EXERCISE SCENARIO.	20
IV. EVALUATIONS AND RECOMMENDATIONS.	21
1. State	21
2. Emergency Operating Facility.	24
3. Westchester County.	27
4. Rockland County	39
5. Orange County	48
6. Putnam County	56
7. Dutchess County	67
V. CORRECTIVE ACTION FOR DEFICIENCIES	68
1. Schedule for Correcting Significant Deficiencies.	68

II. EXECUTIVE SUMMARY

A joint exercise of the emergency preparedness plans for the Indian Point site was held on March 3, 1982. The off-site exercise was observed by a team of 50 federal observers, who reported their findings to the Federal Emergency Management Agency (FEMA). Participating in the exercise were the owner of Indian Point Unit 3, Power Authority of the State of New York (PASNY), officials and agencies of the State of New York, and the counties of Westchester, Rockland, Orange, Putnam, and Dutchess.

Emergency response facilities observed by FEMA included:

- the Indian Point Emergency Operations Facility (EOF);
- the state Emergency Operations Center (EOC) in Albany;
- the state EOC in the Office of Disaster Preparedness, Southern District;
- the Westchester County EOC;
- the Rockland County EOC;
- the Orange County EOC;
- the Putnam County EOC;
- the Dutchess County EOC; and
- the Emergency News Center in Verplanck.

The Dutchess County EOC also chose to participate in the exercise, although it is not within the 10-mile emergency planning zone.

Evaluators also observed procedures at personnel monitoring centers, at reception/congregate care centers, and at hospitals where simulated accident victims were treated.

Over 50 state, local, and private agencies and departments participated in the exercise.

1. Overview

During the review of the exercise, each of the ten functional areas described in section I.6 were evaluated for the state operations and each of the four municipal counties' operations (except Dutchess). At the state level, all observed functions were carried out well; only minor deficiencies were noted. Among the four counties, nine functional areas were evaluated

as weak. These deficiencies, positive areas of performance, and corrective recommendations are detailed in the summaries provided below and in the following pages.

Several concerns were identified during the exercise that influenced the evaluation of that element. Some of these concerns are identified below.

- The primary means for alerting the populace to a serious radiological emergency will be a system of sirens. This system is now being installed and is to be tested by the licensees. The existing sirens were activated during the exercise, but some of the units did not sound or were inaudible to local residents. The backup system of notification by sound trucks (police/fire trucks equipped with public address systems) was not used.
- Rockland County's police, fire and volunteer ambulance corps initially chose not to participate in the exercise, claiming that inadequate training had been provided. During the exercise these groups participated, but to a minimal extent, thereby reducing the training benefit of the exercise and the ability to fully evaluate the county's preparedness.
- The effectiveness of the existing radiological public education program should be strengthened. Currently, public education on radiological emergency procedures relies on distribution of pamphlets to residents. Concern remains as to the level of public awareness and response. These concerns include the public's understanding of the concept and geographical boundaries of planning zones. Also, the level of awareness of the non English-speaking residents living in the area should be analyzed.

2. Summary: State Activities

Emergency Operations Facilities and Resources. Facilities and resources in the state EOCs in Albany and Poughkeepsie were good. Displays were well placed and promptly updated. Some additional plotting of dose calculations is recommended. The communications between state and local accident assessment teams were weak. Internal communications and public information arrangements were good.

Alerting and Mobilization of Officials and Staff. All mobilization activities functioned well.

Emergency Operations Management. Management of the response organization was well demonstrated. Increased flow of information in both directions between agencies and decision-makers would be beneficial.

Public and Media Relations. At the state EOC in Albany, press facilities and media briefings were good. At the Joint Media Center, the state PIO staff demonstrated good capability.

Accident Assessment. Accident assessment capabilities were good. However, the state did not demonstrate their own independent field monitoring capability. Some additional computational aids would be of value.

Recovery and Reentry. Short-term and long-term recovery and reentry procedures appeared to be good.

Relevance of the Exercise. Participants felt that the exercise was beneficial for training and experience. Use of simulated meteorology and the rapid pace of scenario events detracted somewhat from the realism of the exercise.

3. Summary: Indian Point Emergency Operating Facility (EOF)

Emergency Operations Facilities and Resources. The EOF in Buchanan had acceptable capabilities; however, space was limited and inconveniently arranged. Internal and external communication systems could be improved.

Alerting and Mobilization of Officials and Staff. Staffing and notification was acceptable. Additional feedback from the state and counties to the EOF would be of benefit.

Emergency Operations Management. Management of the response was good for state representatives and acceptable for the county representatives. More involvement of the state and county in decision making is recommended.

Accident Assessment. Capabilities in this area were acceptable. Computing capability for rapid response is recommended. Improvement is needed in use of monitoring data.

Relevance of the Experience. The exercise was felt to be beneficial to the participants.

4. Summary: Westchester County

Emergency Operations Facilities and Resources. The facilities at the Westchester County EOC were good overall. The working space was small but adequate because of the layout. Communication, internal and external, was good. Backup RACES communication capability was demonstrated. Displays and maps were well organized and security was good.

Alerting and Mobilization of Officials and Staff. Westchester County demonstrated a good capability for alerting and mobilizing officials and staff in a timely manner. This resulted from good communications and from adequate procedures and backup personnel. The capability for 24-hour alerting and 24 hour a day operation was good. There is some concern over the availability of enough personnel to adequately staff the reception centers if an actual emergency started on a weekend.

Emergency Operations Management. Emergency operations management, headed by the County Executive, was very good, and demonstrated well-defined leadership at several levels. The staff was kept well informed through periodic briefings by the leaders.

Public Alerting and Notification. Public alerting and notification actions were weak, due primarily to the unsatisfactory performance of the siren system. Lack of understanding by some of the populace of the meaning of the sirens; lack of knowledge of the emergency response planning areas (ERPA); and lack of adequate notification of transients were observed. The procedures for broadcasting EBS messages were very good; EBS messages were well written and timely. Activation of EBS station and issuance of first EBS message were excellent.

Public and Media Relations. The public and media relation actions were acceptable, however, public education programs and rumor control procedures need improvement. Public education pamphlets were mailed and received by rate payers, but apparently were not effective, because the public as a whole seemed to have a general lack of knowledge of radiological emergency preparedness. People who do not pay utility bills directly, such as some tenants, may not have received the pamphlets. Emergency information was not posted, nor was it printed in the telephone book.

Accident Assessment. Accident assessment capabilities were evaluated as acceptable but some deficiencies are noted. The radiological assessment

instrumentation was good, except that the instrument used for measuring radioiodine should be equipped with a silver-containing air filter. Procedures for quickly measuring contamination in liquid samples are needed. Projected dose calculations were good, and field monitoring teams were well trained and capable. The ability to recommend protective actions based on the protective action guidelines was well demonstrated.

Actions to Protect the Public. Overall, the Westchester County personnel demonstrated an acceptable capability to protect the public by implementing protective measures. Improvements are needed in the details of the procedures for relocating residents who do not have private vehicles, in protecting mobility-impaired persons, and in dealing with potential impediments to evacuation.

Health, Medical, and Exposure Control. Most of the health, medical, and exposure control capabilities were weak. The 24-hour capability to determine exposures of emergency workers was weak because of instrumentation problems, while decontamination procedures were weak primarily because of a lack of adequate waste disposal, especially for liquid wastes. Control of access to evacuated areas was good, and maintenance of dose records was good. Action levels that require decontamination procedures were well established.

Recovery and Reentry Operations. Simulated reentry operations made it appear that the capability to recover and reenter exists.

Relevance of the Exercise Experience. Participants felt that the exercise was a good learning experience.

5. Summary: Rockland County

Emergency Operations Facilities and Resources. The facilities at the Rockland County EOC were weak. Significant deficiencies were noted relating to external and internal communications, leadership in the EOC, and space allotment.

Alerting and Mobilization of Officials and Staff. The capability for alerting and mobilization of staff from the EOC was weak. Deficiencies were noted related to the lack of telephone lines and staff to perform initial calling. Backup staff was also lacking. Overall improvement in communications is needed.

Emergency Operations Management. Organizational control, leadership, and decision making were acceptable. However, effective management of the EOC by one individual was not demonstrated. More familiarity is needed with response procedures.

Public Alerting and Notification. Initial notification of the public was weak, primarily because of siren system malfunction. Activation of the EBS station and issuance of the first EBS message were well coordinated. EBS messages were professionally coordinated, cleared, and issued.

Public and Media Relations. Media capabilities were acceptable. However, public awareness of a public education brochure was low. Rumor control needs to be strengthened. There may be a need to translate the brochure in order to reach non-English speaking individuals.

Accident Assessment. Accident assessment capabilities were weak. Poor communication systems contributed to problems in this area. Field monitoring teams need more training with their instruments. The role of the county representative at the EOF needs to be better defined.

Actions to Protect the Public. Capabilities for protection of the public were good. Evacuation and decontamination were well demonstrated.

Health, Medical, and Exposure Control Measures. These activities were well demonstrated. Facilities were good and well staffed.

Recovery and Reentry Operations. The capability of the EOC for recovery and reentry was good, as demonstrated by simulation. Activities in the field were not observed, due to the shortness of the scenario.

Relevance of the Experience. Lack of involvement by some local agencies reduced the effectiveness of the exercise. The inclusion of a simulated wind shift in the scenario was good, but the county's computer analysis system was not used during the exercise.

The exercise identified areas that would benefit from additional training and better equipment.

6. Summary: Orange County

Emergency Operations Facilities and Resources. The facilities at the Orange County Emergency Operating Center (EOC) were evaluated as acceptable.

Some deficiencies were noted, particularly with the communication system linking Orange County with the other counties. Internal communications systems could also be improved. Maps and displays were generally good. Acceptable security was provided.

Alerting and Mobilization of Officials and Staff. The overall capability for alerting and mobilization was evaluated as weak, based upon a deficiency in the key element of 24-hour shift change capability. Backup personnel did not demonstrate sufficient knowledge in all essential areas. The remaining elements in this category were in general adequately demonstrated, although poor communications between agencies in the EOC led to difficulties in establishing access control points.

Emergency Operations Management. Organizational control, leadership, decision making and support by officials were acceptable. Performance was affected by internal communications in the EOC, which depended upon hand-carrying messages between rooms in the facility. Briefing of agencies was sporadic and written updates were not always available.

Reception centers, congregate care facilities, and the decontamination center were well staffed and organized.

Public Alerting and Notification. Public alerting and notification were weak, due primarily to the unsatisfactory performance of the siren system. The EBS was activated in a timely manner. The first EBS message was coordinated with the siren sounding. Procedures for issuing EBS messages were good.

Public and Media Relations. The capability for dealing with the media was good. Rumor control needs to be strengthened. Public education programs also should be strengthened.

Accident Assessment. Capabilities for accident assessment were rated as acceptable. Deficiencies noted included the failure of the field monitoring teams to carry full instrumentation.

Actions to Protect the Public. Means for sheltering or evacuating the public were evaluated as good. All observed facilities were well staffed. Lack of data on radioiodine levels in the field were believed to affect decisions for public protection.

Health, Medical, and Exposure Control Measures. Procedures for medical treatment and exposure control were evaluated as acceptable. Deficiencies noted included the lack of provision for disposal of contaminated wastes. Hospital personnel need additional training. Permanent dose recording instruments were not available for emergency workers.

Recovery and Reentry. Recovery and reentry procedures were evaluated as weak. The significant deficiency related to the lack of full simulation by participants.

Relevance of the Experience. The exercise seemed to provide an acceptable level of experience. One drawback noted was that some response teams were not fully tested, while others were tested on skills that were considered routine.

7. Summary: Putnam County

Emergency Operations Facilities and Resources. The working space in the Putnam County EOC was cramped, which resulted in some minor discomfort to the staff. The overall functioning of the EOC was good in spite of the small size, because the management was good. Communication systems were good, and had good backup.

Alerting and Mobilization of Officials and Staff. Putnam County demonstrated an acceptable capability for alerting and mobilizing officials and staff. The procedures used would have been effective at any time during the day or night, and resulted in a prompt and timely activation of the EOC and field monitoring teams. A capability for continuous operations 24 hours per day was well demonstrated by executing a shift change and by exhibiting lists of backup personnel. This shift change revealed that two key people, the CD Director and the radiological defense (RADEF) officer, do not have adequate backup. An emergency generator was not available in the event of power failure.

Emergency Operations Management. The management of the Putnam County EOC was very good and was well supported by elected officials. Many specific organizations had well-defined roles and demonstrated good performance. Leadership was excellent and support by the RACES organization was excellent.

Public Alerting and Notification. Public alerting and notification were weak, due primarily to the unsatisfactory performance of the siren system. Activation of the EBS station and issuance of first EBS message were good. Other EBS messages were cleared and issued on a timely basis. Some route alerting by police and fire vehicles was simulated but no PA announcements were made. Deficiencies were noted in the ability to notify the transient population.

Public and Media Relations. The capability for public and media relations in Putnam County was acceptable overall. Public education brochures were mailed to the public, and public training courses were given by the fire department and RACES personnel. Nevertheless, there appears to be a need for additional education to help the public understand protective actions and ERPA zones. The PIO officer had good access to all information, and prepared timely and appropriate releases. There was no evidence of a coordinated effort to identify and control rumors.

Accident Assessment. Accident assessment capabilities were evaluated as acceptable; however, some deficiencies were noted. Initial projections of radiological exposure were made independently in a timely manner and confirmed the utility projections. Field monitoring teams were promptly deployed, and were very competent. The instrumentation for whole body gamma ray was good. However, there was no capability for measuring radioiodine. Silver-loaded filters are needed to provide capability for measuring radioiodine.

Actions to Protect the Public. Putnam County demonstrated a good capability to protect the public. Roadblocks were set up promptly. Orders were given in a timely manner for the actions to simulate sheltering and then evacuation. A bus load of students was evacuated (in actuality) to the congregate care center in Dutchess County. This was well done. The congregate care centers were well located, well staffed, and well equipped. Their procedures were good; however, the radiation monitoring personnel could benefit from additional training.

Health, Medical, and Exposure Control. Overall, the health, medical, and exposure control actions were acceptable, with the exception of the procedures for ultimate disposal of contaminated liquids. Direct reading

dosimeters supplied to emergency workers had appropriate ranges and sensitivities. Readings were made and recorded frequently, and the results reported by radio to the EOC. No permanent-record dosimeters were provided. Procedures for approval of exposure of emergency workers in excess of protection action guides need to be clarified. Action levels for decontamination procedures were known.

Recovery and Reentry Operations. Reentry operations were demonstrated by simulation only. An acceptable capability for reentry and recovery appears to exist.

Relevance of the Exercise Experience. There was unanimous agreement that the exercise was very beneficial to the participants, all of whom took the exercise very seriously and performed as if the power plant accident actually occurred.

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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

POWER AUTHORITY OF THE STATE OF NEW YORK)
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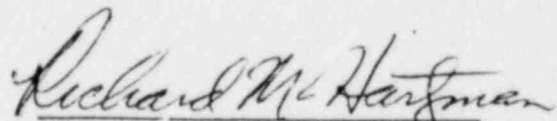
Docket Nos. 50-247 SP
50-286 SP

Certificate of Service

I hereby certify that copies of:

FOE/AUDUBON AND WESPAC'S RESPONSE IN
SUPPORT OF UCS/NYPIRG MOTION FOR RE-
CONSIDERATION OF COMMISSION RULING
ALLOWING INTERIM OPERATION AND FOR
ISSUANCE OF A SHOW CAUSE ORDER AGAINST
LICENSEE'S, AND FOE/AUDUBON AND WESPAC'S
PRESENTATION OF ADDITIONAL NEW EVIDENCE

have been served on the official minimum service list for the above
captioned proceeding by depositing in the United States mail, first class,
this 8TH day of JUNE, 1982.



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