

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

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In the Matter of	:	Docket Nos.
CONSOLIDATED EDISON COMPANY OF NEW YORK, 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)	:	June 14, 1982

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POWER AUTHORITY'S CROSS-EXAMINATION PLANS
FOR STATE OF NEW YORK, COUNTY OF ROCKLAND,
FEDERAL EMERGENCY MANAGEMENT AGENCY, AND
COMMISSION STAFF UNDER COMMISSION QUESTIONS
3 AND 4

ATTORNEY FILING THIS DOCUMENT:

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PRELIMINARY STATEMENT

Power Authority of the State of New York ("Power Authority"), licensee of Indian Point 3 Nuclear Power Plant, submits these plans for the cross-examination of witnesses under Commission Questions 3 and 4 presently identified by the State of New York, the County of Rockland, the Federal Emergency Management Agency, and the Nuclear Regulatory Commission Staff.* These cross-examination plans reflect the Power Authority's expectations, at this time, of the principal areas of cross-examination. The Power Authority reserves its rights to conduct additional cross-examination based upon subsequent developments or where otherwise necessary to protect its rights.**

* Intervenor Union of Concerned Scientists/New York Public Interest Research Group, Inc., Westchester People's Action Coalition, Inc., West Branch Conservation Association, Friends of the Earth, New York City Audubon Society, Parents Concerned About Indian Point, and Rockland Citizens for Safe Energy, and the interested state, the Attorney General of the State of New York, have collectively filed a melange of documents purporting to be the direct testimony of 157 witnesses on Commission Questions 3 and 4, and an application to untimely file direct testimony of 14 additional witnesses. This extraordinary number of purported witnesses is the subject of a separate motion by the licensees. Accordingly, the Power Authority is not submitting (and, indeed, could not reasonably be expected to submit) cross-examination plans for those witnesses, pending determination of that motion.

** Further, the categories set forth below represent substantive areas of inquiry on cross-examination. Within these categories, cross-examination directed toward impeaching the witness' direct testimony may be conducted. Such cross-examination may include examination regarding motive, bias, or prior inconsistent statements by the witnesses.

The Power Authority further reserves any and all objections to the testimony of individual witnesses, or portions thereof, including, but not limited to, motions to strike the testimony of individual witnesses.

AREAS OF CROSS-EXAMINATION
OF STATE OF NEW YORK WITNESSES

- I. CLARIFICATION AND SPECIFICATION OF TESTIMONY
- II. STATE POSITIONS ON ISSUES RAISED BY TESTIMONY
OF OTHER PARTIES AND INTERVENORS
- III. SITE SPECIFICITY OF ALLEGED DEFICIENCIES
- IV. EMERGENCY RESPONSE FUNCTIONS AND INTERRELATIONSHIPS
 - A. Roles and capabilities of State, counties, licensees
and federal agencies.
 - B. Interaction between response organizations.
 - C. Roles of consultants.
- V. NECESSITY OF AND GROUNDS FOR RECOMMENDED FURTHER
ACTIONS

AREAS OF CROSS-EXAMINATION
OF COUNTY OF ROCKLAND WITNESSES

- I. WITNESS QUALIFICATIONS
 - A. Expert credentials
 - B. Factual knowledge
 - C. Education, training and experience
 - D. Other

- II. GROUNDS FOR TESTIMONY
 - A. Documentation
 - B. Factual knowledge
 - C. Research, studies, and observations
 - D. Clarification and specification of testimony
 - E. Other

- III. KNOWLEDGE OF EMERGENCY PLANNING AND GOVERNMENTAL REQUIREMENTS FOR SUCH PLANNING
 - A. Generic knowledge
 - 1. Radiological emergency planning
 - 2. General emergency planning
 - B. Indian Point knowledge
 - 1. Plan documents
 - 2. Planning process
 - 3. Brochures and public information
 - 4. Levels of responsibility
 - 5. State law
 - 6. Other

AREAS OF CROSS-EXAMINATION
OF COUNTY OF ROCKLAND WITNESSES
(continued)

IV. SITE SPECIFICITY OF ALLEGED DEFICIENCIES

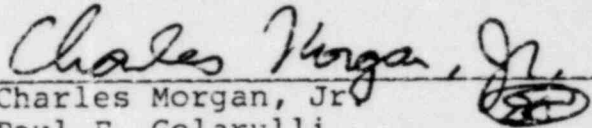
V. PREPAREDNESS FOR EMERGENCIES IN GENERAL
(RADIOLOGICAL OR NON-RADIOLOGICAL)

- A. How is witness/Rockland County prepared for non-radiological emergencies?
- B. How would witness/Rockland County respond to a radiological emergency?
- C. Prior experience with emergencies
- D. Grounds for alleged distinctions
- E. Other

AREAS OF CROSS-EXAMINATION OF
FEDERAL EMERGENCY MANAGEMENT AGENCY AND
NUCLEAR REGULATORY COMMISSION STAFF WITNESSES

- I. CLARIFICATION AND SPECIFICATION OF TESTIMONY
- II. SITE SPECIFICITY OF ALLEGED DEFICIENCIES
- III. NECESSITY OF AND GROUNDS FOR RECOMMENDED FURTHER ACTIONS

Respectfully submitted,


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Dated: June 14, 1982

UNITED STATES OF AMERICA
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June 14, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of POWER AUTHORITY'S
CROSS-EXAMINATION PLANS FOR STATE OF NEW YORK, COUNTY OF
ROCKLAND, FEDERAL EMERGENCY MANAGEMENT AGENCY, AND
COMMISSION STAFF UNDER COMMISSION QUESTIONS 3 AND 4
in the above-captioned proceeding have been served on the
following by deposit in the United States mail, first class,
this 14th day of June, 1982.

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