

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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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

December 22, 1982

PARENTS CONCERNED ABOUT INDIAN-POINT
RESPONSE TO LICENSEES' FIRST SET OF INTERROGATORIES
AND DOCUMENT REQUEST UNDER COMMISSION QUESTION 6

INTERROGATORY #12

Define what you mean by "physical environment."

RESPONSE

"Physical environment" means the combination of external or
extrinsic conditions that affect the bodily or material growth and
development of organisms.

INTERROGATORY #13

State the grounds for the statement that the workers in the
plant are exposed to unacceptable levels of radiation.

RESPONSE

Newspaper accounts of actions and statements by Indian Point
workers and NRC enforcement actions.

INTERROGATORY #14

Identify environments or conditions that are used as
reference points for the assertion in Interrogatory Number 13.

RESPONSE

Radioactive water in the storage pool; contaminated rags, tools,
and other solid waste; radioactive dust; violation of safety procedures
during maintenance work; broken and otherwise faulty monitoring devices;
a practice of minimizing information to workers on the effects of radia-
tion; large numbers of repairs required on radioactive equipment; hand-
ling radioactive material without proper protective gear; pressure on

workers to reduce the amount of time spent on refueling outages; inadequate maintenance of employee health records; failure to continuously monitor workers' radiation exposure.

INTERROGATORY #15

Identify and provide all documents that report on the

impact of a nuclear plant on the physical environment of children.
RESPONSE

Parents knows of no such documents. In its Response to Licensees' First Set of Interrogatories and Document Requests Under Commission Question 1 to ... Parents, served on July 23, 1982, Parents identified documents that report on the impact of radiation on children.

INTERROGATORY #16

With regard to the physical environment of adults and children, state how living near the Indian Point site compares with living near other industrial facilities (e.g., chemical plants, fiberglass factories). Identify the health effects associated with the routine operation of all of the above facilities. Identify all those effects that you regard as acceptable.

RESPONSE

Parents Objects to this interrogatory as irrelevant and burdensome.

INTERROGATORY #17

With regard to the physical environment of adults and children, identify and state how the health effects from living near the Indian Point site compare with the health effects of living near other power-generating facilities including, but not limited to, (a) coal-fired plants, (b) oil-fired plants, (c) hydroelectric stations, (d) windmills, (e) solar systems, (f) cogeneration plants, and (g) biomass conversion plants. Identify the health effects associated with the routine operation of all the above facilities. Identify all those effects that you regard as acceptable.

RESPONSE

Parents objects to this interrogatory as irrelevant and burdensome.

INTERROGATORY #18

Compare the physical environment of children living in the vicinity of nuclear plants to that of children who do not live in the vicinity of a nuclear plant. Provide all documents which substantiate your answer.

RESPONSE

The physical environment of children living in the vicinity of nuclear plants contains more radioactivity than the environment of children who do not. This answer is based on common sense: Nuclear plants, in particular Indian Point, vent radioactive material daily, some of which is long-lived radioisotopes which accumulate in the environment.

INTERROGATORY #19

State the grounds for the statement that "the workers are at risk of disease and genetic damage to their offspring".

RESPONSE

Provide all documents that substantiate your answer.

Workers at Indian Point are allowed to receive doses ten times higher than the maximum allowable exposure for members of the general public. Documents noted by Parents in the Response served by Parents on July 23, 1982, report on diseases and genetic damage associated with exposure to radiation. Radiation effects are cumulative and there is no safe threshold dose below which no effects are noticed.

INTERROGATORY #20

Define the age bracket that you associate with being considered a child.

RESPONSE

A child is a person from birth to physical maturity.

INTERROGATORY #21

Identify the differences in health effects from the years of the construction permit grant or reviews. Identify studies which have been done on the subject of the health effects of living near a nuclear plant. Identify such studies which have been done on the Indian Point site in particular.

RESPONSE

This interrogatory should be addressed to the New York State

Department of Health and the Departments of Health in each of the four counties surrounding Indian Point and other counties downwind of Indian Point. When Parents discovers any such studies, it will inform the licensees. Because of the minimal latency periods for solid tumors and leukemia, these health effects may be starting to show up only now from the operation of Indian Point.

INTERROGATORY #121

Identify:

(a) each person whom you expect to call as a witness at the evidentiary hearings relating to Commission Question 6 (including, without limitation, each such person's full name, present address, present employment or other professional affiliation, and qualifications) and annex a copy of said person's resume and list all his publications;

(b) the subject matter and Board contention and underlying intervenor contention on which the witness is expected to testify;

(c) the substance of the facts and opinions to which the witness is expected to testify and a summary of the grounds for each opinion;

(d) each document (including, without limitation, each treatise, book bulletin, accounting interpretation, regulation, report, article, or other literature or writing) upon which the witness has based his testimony, or will so rely at the hearing, or will otherwise refer to in support of his testimony;

(e) any relationship between the witness and any intervenor or party herein; and

(f) any proceeding in which the witness has previously testified and the transcript pages of such testimony (you should annex the transcript pages to your response).

RESPONSE

The response to this interrogatory will be served at a later date.

INTERROGATORY #122

Identify all communications, written or oral, with federal, state, county, or local government officials, upon which you rely in responding to any interrogatories.

RESPONSE

None.

INTERROGATORY #123

Identify and provide all contracts and communications, written or oral, with consultants, contractors, employees or others upon whose testimony, written or oral, you rely

RESPONSE

in responding to any interrogatories.

None.

Respectfully submitted,

Thyllis Rodusz
for Parents Concerned
About Indian Point

CERTIFICATE OF SERVICE

I hereby certify that copies of this document have been served by hand to the New York offices of the licensees' attorneys and mailed to the rest of the minimal service list on December 23, 1982.

Thyllis Rodusz

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