

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

83 FEB 24 A10:27

Administrative Judges:

James Gleason, Chairman
Dr. Oscar H. Paris
Frederick J. Shon

In the Matter of

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

Docket Nos. 50-247-SP
50-236-SP

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

February 19, 1983

WEST BRANCH CONSERVATION ASSOCIATION'S OBJECTION TO "NRC
STAFF'S PROPOSAL FOR RECEIVING EVIDENCE ON COMMISSION
QUESTIONS 3 AND 4"

West Branch Conservation Association (WBCA) takes exception to Staff's above titled proposal of date of February 4 on page 2 regarding the limit of time for Staff's witness Dr. Urbanik.

WBCA is co-lead intervenor on Question 3.9. Dr. Urbanik is consultant to the Staff on roads, as well as on other contentions. Staff may be guided by his assessments. He could not stay over to be cross examined by WBCA and we were promised that he would return. Whatever time anyone has already consumed interrogating Dr. Urbanik has no bearing on the time that WBCA is entitled to.

At this writing we would anticipate requiring 1½ to 2 hours without sharing with all other parties but UCS/NYPIRG who has already cross examined Dr. Urbanik. That cross did not refer to the roads in Rockland County.

for West Branch Conservation Association
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914/634-2327

Zipporah S. Fleisher
By Zipporah S. Fleisher
Secretary

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

James Gleason, Chairman
Frederick J. Shon
Dr. Cesar H. Paris

In the Matter of

CONSOLIDATED EDISON COMPANY OF
NEW YORK, INC. (Indian Point,
Unit No. 2)

POWER AUTHORITY OF THE STATE OF
NEW YORK, (Indian Point,
Unit No. 3)

Docket Nos. 50-247-SP
50-286-SP

February 21, 1983

CERTIFICATE OF SERVICE

This is to certify that I have this day placed in the first class U.S. mail a copy to each of those listed below of First Branch Conservation Association's Motion To Reinstate Paragraph 3.2. Resume and Summary of Frank Fischer testimony and Objection To Staff's Proposal to limit or examination of Dr. Urbanik of February 4.

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Zipporah S. Fleisher
by Zipporah S. Fleisher
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July 19, 1982

BY HAND

Mrs. Z. S. Fleischer
West Branch Conservation Association
443 Buena Vista Road
New City, New York 10956

Dear Mrs. Fleischer:

The following are the responses to the questions which you directed to Stephen L. Baum in your letter of May 26, 1982.

Question 1. Does each plant require people to operate it or can one or both operate for a period of time without personnel? Please advise the time limits.

Answer Each plant requires operators whenever it is in service. The plants cannot be operated without any personnel present.

Question 2. If an emergency took place and an operator at one or both plants felt the need to leave to evacuate his family could he call in a replacement? Is there an arrangement for emergency personnel to report to the plants upon hearing the sirens? What other ways do you have to communicate with outside personnel not on the premises? How long would it take to be sure that the plants have a proper complement capable of running the plants?

Answer Sufficient operators are assigned to each plant at all times to assure their safe and reliable operation. Operators must remain on duty until properly relieved, either by another operator or by a supervisor in an emergency. If additional personnel are required because of the unavailability of personnel on duty,

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they are called in by the supervisors by telephone. A sufficient number of personnel are scheduled for duty at all times to insure that the proper complement capable of running the plant is always available.

Question 3. What assurance, letters of agreement or contracts do you have from employees that they will either stay on the job or report for work? Please supply sample copy of such agreement.

Answer Employees under the Collective Bargaining Agreement agree to report to work and to remain on the job until properly relieved.

Question 4. If either or both plants were to shut down for any reason during such an emergency what automatic substitute would come on the line? How many MW would be supplied from the Pool and for how long?

Answer If it were necessary to evacuate all personnel from either or both plants they would be shut down prior to the evacuation of personnel. High voltage transmission interconnections to the New York Power Pool would be capable of supplying the power requirements of the Orange and Rockland system during this period. The cost of operation would be significantly higher than it would be if the energy were provided from our own plants but the electric system would be capable of continuing operation in this mode.

Question 5. Is there any radiation monitoring equipment available to personnel at either plant in the event of an accident at Indian Point?

Mrs. Z. S. Fleischer
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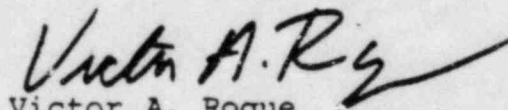
Is there any protective clothing for those who choose to remain at their jobs? Is there any dosimeter for each employee or radiation badge?

Answer

There are no radiation monitoring or protective equipment at either plant for the use of personnel during an emergency. Instructions on the evacuation of these plants will be received from the Civil authorities in accordance with the Emergency Plan in effect at the time. When ordered to do so by the competent authorities, the personnel of the plant will be evacuated.

As Mr. Frank E. Fischer discussed with you in a previous telephone conversation, he is prepared to support these responses at the NRC hearings, if so requested by you.

Very truly yours,


Victor A. Roque
Senior Attorney

VAR/amr

cc: F. E. Fischer