

UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION



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

23 June 1983

UNION OF CONCERNED SCIENTISTS' RESPONSE TO
NYPIRG MOTION FOR RECONSIDERATION
OF COMMISSION DECISION OF JUNE 9, 1983

The Union of Concerned Scientists supports NYPIRG's motion for reconsideration of the Commission decision of June 9, 1983, permitting the Indian Point plants to continue operation without restriction despite continued noncompliance with emergency planning requirements.

We will not repeat the arguments made by NYPIRG. There are two points which should be emphasized.

First, due to the strike by ConEd employees, there can be no pretense that the hundreds of utility employees who are supposed to stand in for local and county personnel and bus drivers will be there to do these jobs. Indeed, the strike will even prevent their being trained and acquainted with their functions. No mention whatever was made to the Commissioners by the utilities or NRC of the imminence of a strike. Had the strike begun before the Commission vote on June 9, the Commission could not have permitted plant operation.

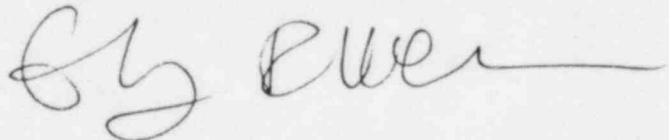
Second, the majority decision and the separate views of the

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Commissioners in the majority appear to have been written without benefit of review of the FEMA report on the status of planning and preparedness which was delivered to the Commission the day before the vote. When one gets beyond the carefully phrased ambiguities of the cover letter and into the substance of the report, it is unquestionably apparent that emergency planning for Indian Point is a chimera. NYPIRG's motion points out some of these deficiencies. UCS was astonished to read in the FEMA report, in particular, that none of the nine training standards have been met. Virtually all of the persons who are supposed to effect an evacuation and to protect the public, including the emergency coordinators, police, fire, bus drivers are not trained. The long list of deficiencies in the plan proceeds from there on, but one can scarcely imagine a more fundamental one. Had the Commission been fully aware of the sorry state of preparedness, it surely would not have allowed Indian Point to operate.

UCS urges the Commission to reconsider its decision of June 9, 1983.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Ellyn R. Weiss', with a long horizontal flourish extending to the right.

Ellyn R. Weiss
General Counsel
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

23 June 1983

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