

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '83

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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

April 12, 1983

PARENTS CONCERNED ABOUT INDIAN POINT
MOTION FOR EXTENSION OF TIME TO SUBMIT
TESTIMONY ON CONTENTION 6.2

Parents Concerned About Indian Point has complied with the Board's revised schedule for the rest of the special safety investigation by submitting the testimony of John R. Thornborough on contention 6.2. Mr. Thornborough's testimony was included in Parents Response to Licensees' Motion to Compel Under Commission Question 6, dated March 24, 1983.

During the last few days, Parents has been able to secure the agreement of Dr. Alice Stewart, Dr. Berry Brazelton, and Dr. Daryl Bohning to testify on the contention, "A benefit would accrue from the shutdown of Indian Point Units 2 and 3 because the environment of children in the vicinity would be improved by a decrease in the release of radioactive material."

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Dr. Stewart is Senior Research Fellow at Birmingham University in England and an internationally recognized x-ray researcher. Dr. Stewart and her colleagues in Great Britain were responsible for landmark studies in Great Britain on the effects of ionizing radiation on infants in utero, including subsequent leukemia and cancer in childhood.

Dr. Stewart would testify on behalf of Parents Concerned About Indian Point that there is no threshold dose of ionizing radiation below which no ill-effects occur; routine and accidental emissions from the nuclear reactors at Indian Point cannot be assumed to be harmless; the effects of ionizing radiation are delayed and may be masked in a population of hardy individuals; human cells are most vulnerable to the effects of ionizing radiation during embryonic and early childhood development when the cells are rapidly dividing; and children who live near the plants are exposed during the period of greatest vulnerability.

Dr. Brazelton is currently Associate Professor of Pediatrics, Harvard Medical School, and Chief, Division of Child Development, Children's Hospital Medical Center, Boston, Massachusetts. Dr. Brazelton's curriculum vitae is attached. Dr. Brazelton would testify on behalf of Parents that present medical knowledge about the effects of low-level radiation leads a prudent practitioner to advise against any unnecessary exposure to radiation, and this is especially true of children.

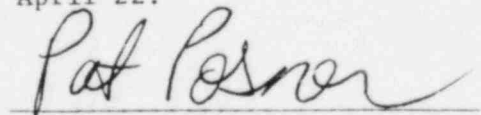
Because of the very busy schedule of these experts, and because Dr. Stewart lives in England, it is impossible for them to appear before this Board any time except the latter part of May. Dr. Stewart and

Dr. Brazelton are willing to travel to Washington to give testimony at that time, and Parents respectfully requests that this Board modify the hearing schedule to the extent necessary to accomodate these witnesses.

We are not requesting that findings of fact on other issues be delayed, but that a date be set ten days after the Board hears the testimony of the eminent experts offered by Parents as a deadline for findings of fact on contention 6.2, if the witnesses are scheduled after May 17, which is ten days before findings of fact are due.

Dr. Daryl Bohning received his PhD in physics from Iowa State University and has done post doctoral work in physics at Rutgers University and post doctoral work in bio-physics at Harvard. He has had ten years experience in environmental and biological research including research in the medical use of radioisotopes and other aspects of nuclear medicine. He has recently completed a chapter for a book entitled Nuclear Almanac. Dr. Bohning's contribution to the book is called "Radiation and Public Health: A Perspective."

Dr. Bohning will base his testimony on NUREG/CR 2227, NUREG/CR 1496, and NUREG/CR 1497. Each of these documents is an annual report, Radioactive Materials Released from Nuclear Power Plants, a compilation of reports by the Licensees to the Commission. Dr. Bohning will summarize the radioactive materials which will no longer be released at Indian Point if the plants are closed down, and will critically assess the data compiled in the NUREGs. Parents was unable to give Dr. Bohning the material on which he will base his testimony until early April. Dr. Bohning's testimony will be available on Monday, April 18, and we request that his testimony be scheduled for Friday, April 22.



Pat Pesner
Parents Concerned About Indian Point