Docketed USNRC
MAY 09 1983

UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION

In the matter of	)	
	)	
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.	)	Docket Nos.
(Indian Point, Unit No. 2)	)	50-247 SP
	)	50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK	)	
(Indian Point, Unit No. 3)	)	9 May 1983

UNION OF CONCERNED SCIENTISTS
MOTION FOR OPPORTUNITY TO
ADDRESS ISSUES OUTLINED IN COMMISSION
ORDER ESTABLISHING PROCEDURES
FOR DECISION ON ENFORCEMENT ACTION,
CLI-83-11, May 5, 1983

On May 5, 1983, the Commission issued "Order Establishing Procedures for Decision on Enforcement Action." This Order states that, since FEMA has twice found significant deficiencies in emergency planning standards for Indian Point 2 and 3, the "NRC must consider the shutdown of the plants pending correction or mitigation of the two major deficiencies found in the March exercise." Sl. op. at 3.

Accordingly, the licensees, interested federal agencies and affected State and local governments were invited by the Commission to supply their views, both in writing and orally, on the FEMA report and on the question of shutdown. Id.

The Commission did not invite UCS or any of the other Intervenors in the ongoing Indian Point hearing to submit their views. Considering that these Intervenors have spent the last two years closely monitoring the status of

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emergency planning for Indian Point and have just completed hearings during which they presented direct testimony and examined FEMA, NRC and Licensees' witnesses on these issues, Intervenors are in a position to present highly informed views to the Commission. Moreover, since the Commission will be considering to a large extent the same issues that are before the Licensing Board, Intervenors are legally entitled to present their views.

UCS therefore moves that the Intervenors be given the opportunity, along with Licensees and Governmental entities, to present written and oral views according to the schedule established by the Commission Order of May 5, 1983.

Respectfully submitted,

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of	)	
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. (Indian Point, Unit No. 2)	)	Docket Nos. 50-247 SP 50-286 SP
POWER AUTHORITY OF THE STATE OF NEW YORK (Indian Point, Unit No. 3)	)	9th May, 1983

CERTIFICATE OF SERVICE

I hereby certify that single copies of UCS' MOTION FOR OPPORTUNITY TO ADDRESS ISSUES OUTLINED IN COMMISSION ORDER ESTABLISHING PROCEDURES FOR DECISION ON ENFORCEMENT ACTION, CLI-83-11, was served upon the following by deposit in the U.S. mail, first class postage prepaid, this 9th day of May 1983, except where noted otherwise by asterisks.

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