

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges:
James P. Gleason, Chairman
Dr. Oscar H. Paris
Frederick J. Shon

In the Matter of	x	
	x	
	x	Docket Nos.
CONSOLIDATED EDISON COMPANY OF	x	
NEW YORK (Indian Point Unit 2)	x	50-247-SP
	x	50-286-SP
POWER AUTHORITY OF THE STATE OF	x	
NEW YORK (Indian Point Unit 3)	x	May 10, 1983
	x	
	x	

AFFIDAVIT OF ISAAC LEVI

I, Isaac Levi, being duly sworn, state as follows:

1. In my testimony in this proceeding on February 11, 1983 (Tr. 7823-7828), in answer to questions by Judge Frederick J. Shon, I explained the suggested method of making sensible probability judgements described in Section Five of my written testimony, and indicated the significance of my illustrative examples. Upon review of my answer, I believe that it should be clarified.

2. The method of determining worst permissible priors employed in my testimony was based on a simplifying assumption stated on page 37 of my written testimony. This simplifying assumption--that the event, all of whose points are assigned density β , should have total probability .5--implies that $\beta x = \alpha(1-x) = .5$. By removing this simplifying assumption so that βx could be greater than .5, one may obtain mean values for worst permissible priors indefinitely close to the upper end of the assessed range of values of λ .

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3. Thus, the small variation in mean values of λ in my examples, which were pointed out by Judge Shon, depends on a simplifying assumption which is heavily biased in favor of IPPSS.

4. The decision as to what value to assign to βx is, like the value of k , a reflection of the caution of the investigator, that is, how much indeterminacy he seeks to put in his prior judgement. As stated in my testimony, whenever there is a dispute on this point, one should be more rather than less cautious.

5. It should be noted that the assessed range used in the example I took from the Reactor Safety Study as reported in IPPSS is only one order of magnitude. Hence, it is to be expected that the difference in both mean and median estimates will be less than an order of magnitude when relying on these assessed intervals. Other examples could turn out quite different. We can only find out by doing the calculations in IPPSS along the lines I have suggested.

6. Finally, on line 24 of page 7826 of the transcript, "medians" should read "means," and vice versa at the end of the sentence.


Isaac Levi

Subscribed and sworn to before me
this 10th day of May, 1983.


NOTARY PUBLIC

RICHARD M. HARTZMAN
NOTARY PUBLIC, STATE OF NEW YORK
No. 1-4-39339
Qualified in New York County
Commission Expires March 30, 1984