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June 14, 1984

OFFICE OF THE CLERK
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Commissioners:

Nunzio J. Palladino, Chairman
Victor Gilinsky
Thomas M. Roberts
James K. Asselstine
Frederick M. Bernthal

PROCT. & UTIL. FAC.

50-247/286 OC

Dear Sirs:

We wish to notify the Commission that we are requesting two copies of the Staff report regarding the Indian Point Licensees' request for an exemption from NRC's annual full-scale exercise requirement. We understand that the report will be available on June 15.

Having previously filed a formal objection to the granting of an exemption, it is our intention to review and to comment on the Staff's report when it has been made available to us. We request the Commission to take whatever action is necessary to provide us with an opportunity to have our comments on this matter--including our comments on the Staff's report--considered as part of your own review of the Staff's position.

On June 9, 1983, by a vote of three-two, the Commission decided to permit continued operation of Indian Point 2 and 3. The basis of that decision was that major deficiencies in emergency planning and preparedness at Indian Point were about to be corrected and eliminated, especially (1) the lack of a Rockland County plan and a demonstrated Rockland capability to protect the public; and (2) the lack of an adequate transportation plan for Westchester County, including needed revised bus routes, bus company and bus driver contracts, and bus driver training.

One year later, these and other deficiencies in both counties remain and the Licensees, the Counties, and the State are currently unprepared to demonstrate that they are jointly capable of protecting the public in the event of an accident at Indian Point. If they are not ready and able to conduct a test, they are not ready and able to cope with an accident.

With no exercise, there will be no FEMA/NRC evaluation of the adequacy of preparedness to protect the public for many months to come. This lack of monitoring and oversight of a major safety matter at the nation's most densely populated reactor site is wholly unacceptable.

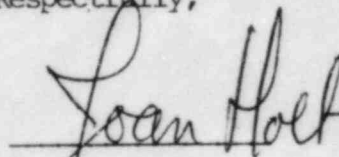
Finally, the Commission should take careful note that there is absolutely no assurance or commitment that Rockland, Westchester, New York State, the

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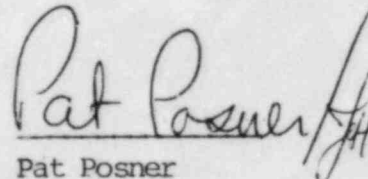
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Licensees--or, for that matter, FEMA--will be prepared to participate in a full-scale exercise in November. Words used now are "probably in November" or "until at least November 30, 1984." The history of emergency planning at Indian Point is, as we all know too well, one of missed deadlines.

Respectfully,

A handwritten signature in cursive script that reads "Joan Holt".

Joan Holt
New York Public Interest Research Group

A handwritten signature in cursive script that reads "Pat Posner".

Pat Posner
Alliance to Close Indian Point