

RELATED CORRESPONDENCEUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBefore the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
LONG ISLAND LIGHTING COMPANY	)	Docket No. 50-322
	)	
(Shoreham Nuclear Power Station,	)	
Unit 1)	)	

SOC'S THIRD SET OF  
INTERROGATORIES AND REQUEST FOR PRODUCTION  
OF DOCUMENTS TO LONG ISLAND LIGHTING COMPANY

I.



Pursuant to 10 CFR Sections 2.740(b) and 2.741(d), the Shoreham Opponents Coalition, (SOC) serves on the Long Island Lighting Company (LILCO) the interrogatories and requests for production of documents that appear below. If the answer to any question is not known when the response is filed, the answer must be provided as soon as the missing information becomes available.

In view of the resumption of informal discovery and discussions among SOC, Staff and LILCO, a sworn response to these interrogatories and documents requests need not be provided within the time frames stated in the regulations. It is SOC's understanding that these interrogatories will be discussed prior to and at the next informal meeting among the parties and that LILCO will begin to assemble its answers prior to the date of that next meeting.

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As used in the interrogatories and request for production of documents, the following definitions apply as indicated:

1. "LILCO," means Long Island Lighting Company, its officers, agents, employees and consultants.

2. "Document" or "documents," mean any handwritten, typed, printed, recorded or graphic matter however produced or reproduced, including material stored for use in automatic data processing systems, whether or not in the possession, custody or control of LILCO and whether or not claimed to be privileged against discovery on any ground, including: reports; records; lists; memoranda; correspondence; telegrams; schedules; photographs; sound recordings; films; hand, machine and computer calculations; computer codes; data; and written statements of witnesses or other persons having knowledge of the facts.

Please provide answers to the following questions which pertain to specific SOC contentions in Docket No. 50-322.

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Each of the three interrogatories and documents requests that appear below are to be answered for each of the Regulatory Guides admitted as part of SOC Contention 19 by the Board's Memorandum and Order dated July 7, 1981, subparts A-L.

1. For each paragraph of the Regulatory position set forth in the Regulatory Guide, state whether or not the Applicant is in full compliance with each paragraph of the Regulatory position.

2. For each paragraph of the Regulatory position identified in question 1 to which the answer is affirmative, cite the relevant portion(s) of the FSAR and/or any other documents which set forth the method of compliance and provide copies of any such documents (other than the FSAR).

3. For each paragraph of the Regulatory position identified in question 1 to which the answer is negative:

- a. Describe the alternative(s) to the Regulatory position implemented by the Applicant;
- b. Is it the Applicant's position that the alternative(s) identified in 3(a) provide an equivalent level of safety to that specified in the Regulatory position?
- c. Explain in detail the basis for the answer to 3(b) and provide copies of all documents upon which the Applicant relies to support that position.

Respectfully submitted,

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Dated: July 29, 1981

RELATED CORRESPONDENCE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
LONG ISLAND LIGHTING COMPANY )  
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(Shoreham Nuclear Power Station,) )  
Unit 1) )

Docket No. 50-322



CERTIFICATE OF SERVICE

I hereby certify that copies of "SOC's Third Set of Interrogatories and Request for Production of Documents to Long Island Lighting Company" dated July 29, 1981, and "Motion of the Shoreham Opponents Coalition (SOC) For Reconsideration of Board's Dismissal of Certain Regulatory Guides Contained in SOC's Contention 19" dated July 30, 1981, and submitted by the Shoreham Opponents Coalition, in the above captioned proceeding, have been served on the following, by deposit in the United States mail, first class, this 30th day of July, 1981:

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