

## KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER &amp; PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20036

TELEPHONE (NOM) 452-7000  
 CABLE KIPHI  
 TELEX 440900 KIPH UI  
 WRITER'S DIRECT DIAL NUMBER

August 2, 1983

IN PITTSBURGH  
 KIRKPATRICK, LOCKHART, JOHNSON & HUTCHISON  
 1500 OLIVER BUILDING  
 PITTSBURGH, PENNSYLVANIA 15222  
 (412) 355-0500

(202) 452-7097

David A. Repka, Esq.  
 U. S. Nuclear Regulatory Commission  
 7735 Old Georgetown Road  
 Room 10205  
 Bethesda, Maryland 20814

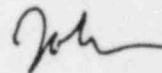
*Bordenick Dewey  
 Repka / Rawson  
 McDonald / Reis  
 FF*

Dear Dave:

Please find enclosed a list of additional informal discovery requests. We would appreciate the responses of the Staff as soon as possible, and we also would appreciate the written responses to discovery requests sent to you under cover dated July 27, 1983.

If you have any questions concerning discovery-related matters, please do not hesitate to call.

Sincerely,



John E. Birkenheier

Encl.

cc: Jessine A. Monaghan, Esq.  
 Stephen B. Latham, Esq.  
 James B. Dougherty, Esq.  
 Ralph Shapiro, Esq.

Additional Discovery Requests  
to NRC Staff

9. Provide copies of all documents relating to the preparation, analysis or review of evacuation time estimates or traffic conditions, with respect to an emergency at Shoreham or on Long Island.
10. Identify the members of the NRC Staff who worked with, or had contact with, Thomas Urbanic, II, in connection with Mr. Urbanic's analyses or views concerning evacuation of Long Island in the event of an emergency at Shoreham.
11. Identify any other persons who worked with Mr. Urbanic, assisted or supervised him in his work on evacuation time estimates for the Staff, or reviewed or commented on that work. Provide copies of any such reviews or comments.
12. Identify any other work, performed by Mr. Urbanic on behalf of the NRC Staff, in connection with emergency planning.
13. Provide a copy of the Staff's contract with Mr. Urbanic relating to his work with respect to Shoreham.
14. Identify all ASLB proceedings in which Mr. Urbanic has testified on behalf of the NRC or any other party and the date of such testimony.
15. Provide a copy of Mr. Urbanic's resume.
16. Provide a list of papers, articles, books or other such documents written and/or published by Mr. Urbanic pertaining to emergency planning or evacuation time estimates.