

HUNTON & WILLIAMS

707 EAST MAIN STREET P. O. Box 1535

RICHMOND, VIRGINIA 23212

TELEPHONE 804-788-8200

S. B. & T. BUILDING
P. O. BOX 109
RALEIGH, NORTH CAROLINA 27602
919-828-9371

FIRST VIRGINIA BANK TOWER
P. O. BOX 3889
NORFOLK, VIRGINIA 23514
804-625-5501

DOCKETED
USNRC
82
NOV 12 1982
1919 PENNSYLVANIA AVENUE, N. W.
P. O. BOX 19230
WASHINGTON, D. C. 20036
202-223-8650
FILE NO. 11:31
DIRECT DIAL NO. 804-788-

November 9, 1982

Lawrence Brenner, Esq.
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Long Island Lighting Company
Shoreham Nuclear Power Station, Unit 1
Docket No. 50-322 OL

Dear Administrative Law Judges:

Enclosed are (1) LILCO's Motion to Strike the Testimony of Kai T. Erikson and Stephen Cole on Suffolk County Contention EP 5(A) -- Role Conflict, (2) LILCO's Motion to Strike Portions of the Direct Testimony of Fred C. Finlayson, and (3) LILCO's Motion for Summary Disposition on the Traffic Congestion Issues, EP 2(B) and 5(B), and the Augmentation of Onsite Staff Issues, EP 5(B) and 7(B).

A word of explanation is in order about the summary disposition motion. On November 2 we advised the Board that

8211150456 821109
PDR ADOCK 05000322
PDR
G

D503

HUNTON & WILLIAMS

our guess at that time was that we would file no motions for summary disposition (Tr. 12,581). In fact we have decided to file one, simply because the issues involved there seem particularly appropriate for summary disposition. We hope this change in plans will not inconvenience anyone.

We have encountered two logistical problems. First, we were simply unable to get the affidavits supporting the motion for summary disposition executed in time for filing today. The best we can do is file the unsigned affidavits and pledge to serve executed copies as soon as possible. Second, four of the other attachments to the summary disposition motion will not reach you until tomorrow. Fortunately they are documents that you already have, because they were served along with LILCO's written testimony:

Attachment 4 to
the motion for
summary disposition

pages 6-7 of LILCO's written
testimony on EP 5(B)

Attachment 5

Attachment 7(B)-6

Attachment 6

Attachment 7(B)-9

Attachment 8

Attachment 7(B)-7

Again, I apologize for any inconvenience this may cause.

Yours very truly,


James N. Christman

126/586

cc: Service List