

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)
Unit 1))

) Docket No. 50-332 (OL)



LILCO'S AMENDED RESPONSE TO
SUFFOLK COUNTY'S REQUESTS FOR
PRODUCTION OF DOCUMENTS

I.

On March 26, 1982, LILCO filed its RESPONSE TO SUFFOLK COUNTY'S REQUEST FOR PRODUCTION OF DOCUMENTS. In that response, LILCO indicated it would make certain documents available to the County beginning March 26, 1982 through April 2, 1982.^{1/} LILCO has provided a vast amount of material thus far in response to the County's discovery requests.^{2/}

As a result of discussions between the parties during this discovery period and beyond, including discussions following the filing of the County's motion to compel on April 2, LILCO hereby amends certain of its answers filed March 26.

^{1/} LILCO actually made documents available on Thursday, March 25.

^{2/} As of April 2, 14,000 pages of material had been copied at the County's request -- a fraction of the material LILCO has provided for the County's inspection.

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In some instances, the County has better defined its original requests, making LILCO's March 26 answers incomplete. And in some instances, LILCO has provided additional information in response to follow-up questions by the County.

Part II below lists LILCO's amended responses to items 2, 7, 8, 10, 14, 15 and 31 of the County's first request for production of documents and to items 17 and 18 of the supplement to the County's second production request. Part III discusses the Stone & Webster materials discussed in the County's motion to compel. Part IV discusses the additional documents requested in the County's motion to compel in response to item 37 of the County's first request for production of documents.

II.

A. Amended Responses to the Request for Production of Documents

2. Request. All Shoreham Emergency Operating Procedures (the "29" Series).

Response. These documents were forwarded to SOC and the County on March 17, 1982.

Amended Response. Only seven of the "29" Series Emergency Operating Procedures were forwarded on March 17, 1982. A copy of the complete "29" Series has now been provided to the County.

7. Request. The most recent and current revision of each of the following Shoreham Procedures:

- (a) SP #23.133.01, "Remote Shutdown Panel Control System."
- (b) SP #29.022.01, "Shutdown From Outside the Control Room Emergency Procedure."
- (c) SP #29.010.01, "Emergency Shutdown Procedure."
- (d) SP #29.015.01, "Loss of Electrical Power Emergency Procedure."
- (e) Deleted by agreement of the parties.
- (f) Deleted by agreement of the parties.
- (g) SP #23.119.01, "Reactor Core Isolation Cooling System."
- (h) Deleted by agreement of the parties.
- (i) SP #23.122.01, "Service Water System."
- (j) SP #23.118.01, "RBCLCWS."
- (k) SP #21.006.01, "Station Operator Training and Qualification Program."

Response. Available on site: (a), (b), (c), (d), (g), (i) (j), and (k).

Amended Response. LILCO will provide the County with copies of revisions (if any) to these procedures as they are issued.

8. Request. The most recent and current revision of each of the following Shoreham Alarm Response Procedures:

(a) ARP 1051, "RSDS Transfer Switch in Emergency Position Div. I"

(b) ARP 1364, "RSDS Transfer Switch in Emergency Position Div. II."

(c) ARP 1365, "RSDS Transfer Switch in Emergency Position Div. III."

(d) ARP (LTR) RSP Access Doors Open.

Response. Available on site: (a)-(c). (d) ARP (LTR) RSP Access Doors Open is not yet complete. LILCO will forward a copy of the final document at a later date.

Amended Response. LILCO will provide on site an index of the Shoreham Alarm Response Procedures for inspection by the County on April 13, 1982.

10. Request. All updated and current Remote Shutdown System front view panel drawing(s).

Response. The remote Shutdown System front view panel drawings are included in the response to 4 above.

Amended Response. The front view panel drawing included in the response to 4 was found by the County to be incomplete. An additional drawing of the panel as installed was made and provided.

14. Request. Report by Reinhart & Associates, Inc. concerning 1981/1982 pre-service inspection tests of the Shoreham Reactor Pressure Vessel (RPV).

Response. Reinhart & Associates has not completed its report. A copy will be forwarded when the report is received by LILCO.

Amended Response. A copy of the draft Reinhart report was provided to the County.

15. Request. Report by Nuclear Energy Services, Inc. concerning 1981/1982 pre-service inspection tests of the Shoreham RPV.

Response. NES, Inc. has not completed its report. A copy will be forwarded when the report is received by LILCO.

Amended Response. A copy of the draft NES, Inc. report was provided to the County.

31. Request. All emergency operating procedures used by LILCO to describe recommended actions with regard to post-accident monitoring instruments and systems.

Response. The post-accident monitoring system is a new addition to the Shoreham Nuclear Power Station. At the present time, LILCO is reviewing a draft copy of the system description. LILCO will write a procedure for the post-accident monitoring system once the system description has been issued as a revision.

Amended Response. Our original response resulted from a misinterpretation of the question. No draft system description of the post-accident monitoring system exists, and LILCO does not plan to write a procedure for that system.

LILCO provided the County with a copy of the lesson plans that will be used to train operators on that system.

B. Amended Answers to the
Supplement to Second Request
for Production of Documents

17. Request. Describe the means by which LILCO has indexed and/or cross-referenced the Shoreham operating procedures, including a copy of any such index or cross-references; in addition, describe the diagnostic guidance available to an operator.

Response. Available on site.

Amended Response. Operators will be trained to respond to different operating situations. As a result of that training, operators will be familiar with the correct procedures to follow in responding to a particular situation. This training encompasses the "diagnostic guidance available to an operator."

18. Request. Describe the organization of reference materials, including procedures, in the Shoreham control room and remote shutdown room.

Response. The Shoreham control room contains a master copy (MC-2) of all station procedures in addition to controlled and working copies of required procedures and copies of other appropriate documents such as Technical Specifications, FSAR, etc. A set of the appropriate station procedures (29.xxx.xx,

22.xxx.xx, 23.xxx.xx, and 69.xxx.xx) are stored in the Remote Shutdown Panel room for reference by the operator. These include emergency procedures, radiation protection procedures, shutdown procedures and system operating procedures for systems controlled at the RSP and/or required for safe shutdown of the plant.

Amended Response. Current plans call for the volumes holding the master copy of procedures to be stored in the control room in bookshelves located on the outside wall of the watch engineer's office.

III.

As the Board knows, certain of the documents requested by the County are Stone & Webster (SWEC) manuals and specifications that SWEC considers to contain confidential commercial information. The Board having entered the Order submitted by the parties on April 6 to resolve the conflict that arose concerning those materials, the manuals and specifications have been made available to the County for inspection.

In its March 26 response to the County's production requests, LILCO indicated that these documents were available on site between March 26, 1982 and April 2, 1982. That answer was given due to LILCO's well founded, good faith belief, after discussions with SWEC and the County, that a nondisclosure

agreement could be promptly negotiated between SWEC and the County.^{3/} Although several draft agreements were exchanged, SWEC and the County were unable to agree upon certain terms. Thus, the SWEC manuals were not inspected by the County between March 26 and April 2.

IV.

In its motion to compel, Suffolk County requested the Board to compel LILCO to produce documents related to these programs:

- E&DCR Verification Program
- LILCO/SWEC As-Built Piping Program
- Final Stress Analysis Review
- Electrical Raceway Qualification
- Final "A" Release Program
- Fuel Load Drawing Update.

Suffolk County contended that these programs are "Q[uality] A[ssurance] design control and design verification audit programs" (Suffolk County's motion to compel at 2) and therefore the documents relating to these programs are responsive to request number 37 in the County's first request for production.

^{3/} To the extent that the County's April 2 motion to compel suggests otherwise, it is wrong.

LILCO continues to believe that the documents relating to these programs are not audits and are therefore outside the scope of County request number 37. However, to avoid further delay in bringing discovery to a close, LILCO has agreed to amend its response to item 37 to include additional information, as follows:

37. Additional Request. For each of the following programs, provide (i) a description of the scope of the program, (ii) the date it was initiated, (iii) the date it will be completed, and (iv) copies of any reports on the progress of the review:

- (a) E&DCR Verification Program
- (b) LILCO/SWEC As-Built Piping Program
- (c) Final Stress Analysis Review
- (d) Electrical Raceway Qualification
- (e) Final "A" Release Program
- (f) Fuel Load Drawing Update
- (g) FSAR Configuration Check.

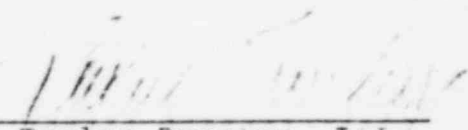
Response.

- (a)(i) Procedures describing the program will be provided.
- (ii) July, 1976
- (iii) After commercial operation.
- (iv) LILCO's monthly reports beginning March 1982 and the program logs will be provided.
- (b)(i) Procedures describing the program will be provided.
- (ii) September, 1981

- (iii) July, 1982
- (iv) LILCO's reports will be provided.
- (c)(i) Procedures describing the program will be provided.
- (ii) December, 1981
- (iii) August, 1982
- (iv) LILCO's reports will be provided.
- (d)(i) Procedures describing the program will be provided.
- (ii) October, 1981
- (iii) August, 1982
- (iv) LILCO's reports will be provided.
- (e)(i) Procedures describing the program will be provided.
- (ii) February, 1982
- (iii) September, 1982
- (iv) No LILCO reports exist.
- (f)(i) Procedures describing the program will be provided.
- (ii) March, 1981
- (iii) September, 1982
- (iv) No LILCO reports exist.
- (g)(i) Procedures describing the program will be provided.
- (ii) December, 1981
- (iii) September, 1982
- (iv) LILCO's reports will be provided.

LILCO has agreed to ship to the County (at its expense) copies of the documents listed in this response.^{4/}

Respectfully submitted,



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DATED:

^{4/} The County refused to first examine these materials on site to determine whether it required copies of all the documents.