

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 29 10:12

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

Docket No. 50-322 O.L.

(Security Proceeding)

MOTION FOR BOARD APPROVAL OF ADDITIONAL
SECRETARIAL ASSISTANCE



Suffolk County hereby moves the Board to approve Ms. Amy Pinto, a secretary at the law firm of Kirkpatrick, Lockhart Hill, Christopher & Phillips, as a person authorized to type pleadings and other necessary materials which may contain safeguards information. A copy of Ms. Pinto's executed Affidavit of Non-Disclosure is attached hereto.

By earlier order of this Board, Mrs. Diana Kraemer, secretary to Mr. Lanpher, was authorized to type safeguards information for Suffolk County. Mrs. Kraemer also works for another attorney at the law firm and, accordingly, is not always available to type security materials. Suffolk County thus needs the additional assistance of Ms. Pinto, a secretary working with Michael S. Miller of this law firm, to ensure that the necessary typing is performed.

The undersigned has spoken with NRC Staff counsel who has no objection to Ms. Pinto being permitted to type safeguards

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information. LILCO, however, refuses to grant permission. LILCO has stated that Suffolk County should have only one secretary for the security proceeding. Thus, it is LILCO's view that if Ms. Pinto is permitted access, then the access authorized for Mrs. Kraemer must be revoked.*

Suffolk County respectfully moves the Board to authorize Ms. Pinto to type safeguards information. It is clear that more than one person capable of performing secretarial support services is necessary to prepare the growing number of outlines, questionnaires, testimony and pleadings which are necessary to prepare the several elements of the County's positions in the security proceeding. This is particularly true because such secretarial services must be performed at the NRC's Willste Building, creating a severe logistical problem since secretaries work with more than one attorney.

Further, our firm's secretaries, just like any other firm's secretaries, are sometimes ill, on vacation, or unavailable for other good reason. For example, Mrs. Kraemer will be absent several days this week on a pre-scheduled vacation and will also be absent later this summer at certain times. Ms. Pinto, likewise, will be taking vacation. Surely, we do not presume to know when either might be ill or otherwise unavailable. Accordingly, it is essential that more than one secretary in this firm


* LILCO did not request a copy of Ms. Pinto's resume. Rather, its opposition is founded solely on the view that one secretary is all that the County should have.

be authorized to perform these necessary services.

The County respectfully requests expedited Board ruling on this Motion. A copy of this Motion is being telecopied to LILCO.

Respectfully submitted,

David H. Gilmartin
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April 28, 1982

Attorneys for Suffolk County

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NUCLEAR REGULATORY COMMISSION

'82 APR 29 AIO:13

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

LONG ISLAND LIGHTING COMPANY

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Unit 1)

Docket No. 50-322 O.L.

AFFIDAVIT OF NON-DISCLOSURE

I, Amy Pinto, being duly sworn,
state:

1. As used in this Affidavit of Non-Disclosure, (a) "protected information" is (1) any form of the physical security plan for the Applicant's Shoreham Nuclear Power Station; or (2) any information obtained by virtue of these proceedings which is not otherwise a matter of public record and which deals with or describes details of the security plan. (b) An "authorized person" is (1) an employee of the Nuclear Regulatory Commission entitled to access to protected information; (2) a person who, at the invitation of the Atomic Safety and Licensing Board ("Licensing Board"), has executed a copy of this Affidavit; (3) a person employed by Long Island Lighting Company, the Applicant, and authorized by it in accordance with Commission regulations to have access to protected information,

or (4) counsel for Long Island Lighting Company.

2. I shall not disclose protected information to anyone except an authorized person, unless that information has previously been disclosed in the public record of this proceeding. I will safeguard protected information in written form (including any portions of transcripts of in camera hearings, filed testimony or any other documents that contain such information), so that it remains at all times under the control of an authorized person and is not disclosed to anyone else.

3. I will not reproduce any protected information by any means without the Licensing Board's express approval or direction. So long as I possess protected information, I shall continue to take these precautions until further order of the Licensing Board.

4. I shall similarly safeguard and hold in confidence any data, notes, or copies of protected information by means of the following:

(a) My use of the protected information will be made at a facility on Long Island to be made available by Long Island Lighting Company or at a facility in Silver Spring, Maryland, made available by the NRC Staff.

(b) I will keep and safeguard all such material in a safe to be provided by Long Island Lighting Company or the NRC Staff, after consultation with Long Island Lighting Company or the Staff, and to be located at all times at the above designated locations.

(c) Any secretarial work performed at my request or under my supervision will be performed at the above locations either (1) by a secretary provided by the Long Island Lighting Company or the NRC Staff authorized in accordance with paragraph 1(b)(3) above, or (2) by one secretary of my designation. I shall furnish Long Island Lighting Company, the Board and Staff an appropriate resume of the designated secretary's background and experience, and that secretary shall comply with paragraph 5 below.

(d) Necessary typing and reproduction equipment will be furnished by Long Island Lighting Company and the NRC Staff.

5. If I prepare papers containing protected information in order to participate in further proceedings in this matter, I will assure that any secretary or other individual who must receive protected information in order to help me prepare those papers has executed an affidavit like this one and has agreed to abide by its terms. Copies of any such affidavit must be filed with and approved by the Licensing Board before I reveal any protected information to any such person, subject to the Licensing Board's April 8, 1982 Order entitled "Further Revision of Protective Order Governing Access to Security Plan Information."

6. I shall use protected information only for the purpose of preparation for this proceeding or any further proceedings in this case dealing with security plan issues, and for no other purpose.

7. I shall sign the receipt provided by the Applicant with any document I receive that contains protected information. At the conclusion of this proceeding, I shall account to the Licensing

Board or to a Commission employee designated by that Board for all the papers or other materials (including notes and papers prepared by me) containing protected information in my possession and deliver them as provided herein. When I have finished using the protected information they contain, but in no event later than the conclusion of this proceeding, I shall deliver those papers and materials to the Licensing Board (or to a Commission employee designated by the Board), together with all notes and data which contain protected information for safekeeping during the lifetime of the plant.

8. I make this agreement with the understanding that I will not corroborate the accuracy or inaccuracy of information obtained outside this proceeding by using protected information gained through the hearing process.

Amy Pinto

DC.

Subscribed and sworn to before me this
28th day of April, 1982.

Patricia A. Hopkins

My Commission Expires January 31, 1985