

LILCO, May 13, 1982

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before the Atomic Safety and Licensing Board

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

LILCO'S PLAN FOR THE CROSS-EXAMINATION  
OF GREGORY C. MINOR REGARDING  
SC CONTENTION 28(a)(iii) and  
SOC CONTENTION 7A(3)--IODINE MONITORING

LILCO lists below the matters and issues it may pursue in cross-examination pertaining to these contentions. On May 13, LILCO filed a motion to strike this testimony as irrelevant to issues raised in the contentions. Obviously, if the motion is successful, no cross-examination will occur. Even if the motion is not successful, LILCO does not anticipate lengthy cross-examination. The testimony involves speculation as to "possible sources of inaccuracies" rather than the presentation of factual information. Thus, there is no reason for extensive cross-examination. LILCO would very likely limit its questioning to Mr. Minor's credentials (item (1) below) and to

establishing his lack of any knowledge that inaccuracies do exist for Shoreham's iodine and particulate monitoring system (item 2(a) below).

Areas of potential concern are:

(1) Qualifications:

- (a) whether Mr. Minor has any experience in the design and operation of radiation monitoring systems, particularly of the type used to monitor iodine at Shoreham; and
- (b) whether Mr. Minor has ever been involved in assessing the accuracy of radiation monitoring equipment.

(2) Mr. Minor's testimony suggests (on pages 4-5), without setting forth any factual basis, that certain inaccuracies exist in the monitoring of iodine and particulates at Shoreham. For each of the alleged inaccuracies listed in the testimony, LILCO intends to pursue three avenues of questioning:

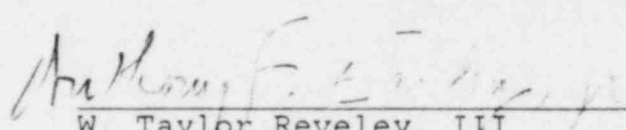
- (a) whether SC has any facts relating to the asserted inaccuracy for the iodine and particulate monitoring equipment used at Shoreham;
- (b) whether there are any measures that can be taken to compensate for the asserted inaccuracy; and

- (c) whether Mr. Minor knows if Shoreham has taken any of these compensating measures.
- (3) Mr. Minor asserts that he cannot determine the extent to which the iodine and particulate monitors at Shoreham comply with ANSI Standard 13.1-1969. LILCO may explore Mr. Minor's views on what he considers the relevant portions of the standard and how they should be taken into account in designing iodine and particulate monitoring systems.
- (4) On page 5 of Mr. Minor's testimony he states that "[e]ven if LILCO did fully comply with ANSI 13.1-1969, in the absence of a defined standard for the over-all release measurement accuracy and without a Shoreham-specific analysis of the release measurement accuracy, there is no evidence that the Shoreham system provides adequate accuracy to meet the concerns expressed in NUREG-0737, Item II.F.1(2)." LILCO intends to explore:
  - (a) to what over-all release measurement accuracy Mr. Minor is referring;
  - (b) how Mr. Minor thinks a Shoreham-specific measurement accuracy would be determined;
  - (c) whether such a determination would require the release of radioactive material into the atmosphere; and

(d) whether Mr. Minor is familiar with how release measurement accuracy will be determined for Shoreham.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

  
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