

LILCO, May 13, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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) )

WHETHER SC 32 AND SOC 19(i)  
ARE RIPE FOR FILING ON MAY 25

1. Until yesterday, counsel for LILCO were unaware that the Staff, County and SOC believe that they lack sufficient information to file testimony by May 25 on SC 32 and SOC 19(i).

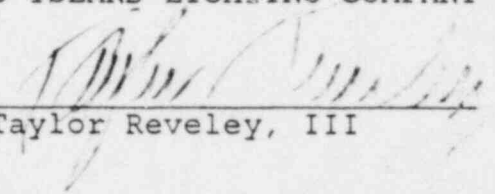
2. Discussions since then have not wholly resolved (a) what exactly it is these parties want, the Staff in particular, (b) whatever it is they want, whether that information would materially affect resolution of the contentions, and (c) when the Company first became aware (if before yesterday) that something material (if anything) might be missing.

3. Given this confusion, we lack the facts to know whether good cause exists to find SC 32 and SOC 19(i) unripe for filing on May 25. Accordingly, as Mr. Lanpher recited in his Motion to Defer of May 12, "LILCO takes no position regarding this motion." As a practical matter, if the Staff, County

and SOC have all concluded that they lack sufficient information to go forward on May 25, that would seem to resolve the issue, given the imminence of the 25th. In light of the present scope and pace of this proceeding, there will inevitably be some belated discoveries of the sort in question. We hope there will not be many.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

  
W. Taylor Reveley, III

Hunton & Williams  
P. O. Box 1535  
Richmond, Virginia 23212

DATED: May 13, 1982

LILCO, May 13, 1982

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

'82 MAY 17 PM 2:15

CERTIFICATE OF SERVICE

I hereby certify that copies of LILCO'S (1) MOTION TO STRIKE THE MINOR TESTIMONY ON SC 28(a)(iii)/SOC 7A(3), (2) CROSS-EXAMINATION PLAN ON MR. MINOR'S TESTIMONY, (3) CORRECTIONS AND ADDITIONS TO THE HILL TESTIMONY ON SC 10, (4) COUNTY ACCESS TO SECURITY PLAN, and (5) COMMENTS ON THE RIPENESS OF SC 32 and SOC 19(i), were served upon the following people by first-class mail, postage prepaid, on May 13, 1982, except for those people indicated by an asterisk who were served by hand on that date, and except that for Item (2) above which went only to the Board:

Lawrence Brenner, Esq.\*  
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

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

Atomic Safety and Licensing  
Appeal Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Bernard M. Bordenick, Esq.\*  
David A. Repka, Esq.  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

David J. Gilmartin, Esq.  
Attn: Patricia A. Dempsey, Esq.  
County Attorney  
Suffolk County Department of Law  
Veterans Memorial Highway  
Hauppauge, New York 11787

Secretary of the Commission  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Herbert H. Brown, Esq.\*  
Lawrence Coe Lanpher, Esq.  
Karla J. Letsche, Esq.  
Kirkpatrick, Lockhart, Hill,  
Christopher & Phillips  
8th Floor  
1900 M Street, N.W.  
Washington, D.C. 20036

Mr. Mark W. Goldsmith  
Energy Research Group  
400-1 Totten Pond Road  
Waltham, Massachusetts 02154

MHB Technical Associates  
1723 Hamilton Avenue  
Suite K  
San Jose, California 95125

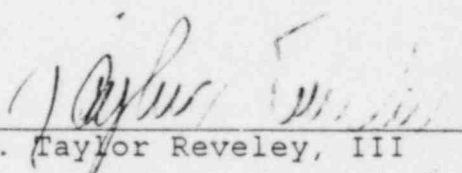
Stephen B. Latham, Esq.  
Twomey, Latham & Shea  
33 West Second Street  
P. O. Box 398  
Riverhead, New York 11901

Ralph Shapiro, Esq.  
Cammer and Shapiro, P.C.  
9 East 40th Street  
New York, New York 10016

Howard L. Blau, Esq.  
217 Newbridge Road  
Hicksville, New York 11801

Matthew J. Kelly, Esq.  
New York State Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223

Mr. Jay Dunkleberger  
New York State Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223

  
W. Taylor Reveley, III

Hunton & Williams  
707 East Main Street  
P. O. Box 1535  
Richmond, Virginia 23212

DATED: May 13, 1982