

LILCO, June 2, 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))

LILCO'S FIRST REQUEST TO SUFFOLK COUNTY FOR
PRODUCTION OF EMERGENCY PLANNING DOCUMENTS

The Long Island Lighting Company (LILCO) hereby requests Suffolk County to produce at LILCO's offices in Hicksville or at another mutually agreed-upon location each of the documents set forth below, within thirty (30) days after service of this request, in accordance with 10 C.F.R. § 2.741. These document requests pertain to the emergency planning and preparedness issues under consideration by the Atomic Safety and Licensing Board in the Shoreham operating license proceeding.

DEFINITIONS

A. "County" means the government organization of Suffolk County and any officer, official, employee, representative, consultant, agent, contractor, subcontractor, technical advisor, attorney, or other person acting for or on behalf of the County or at the County's direction, or in concert with the County or assisting the County.

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B. "Person" means any natural person, firm, partnership, educational institution, joint venture, corporation, and any domestic government organization, or group of natural persons or such entities.

C. "Document" means any handwritten, typewritten, printed or recorded graphic matter however produced or reproduced, whether or not in the possession, custody or control of the County and whether or not claimed to be privileged against discovery on any ground, including but not limited to, reports, records, lists, memoranda, correspondence, telegrams, schedules, photographs, sound recordings, ledgers, books of account, catalogues, checks, check stubs, brochures and written statements of any person.

If the County considers any document called for in this request to be privileged from production, the County must include in its response to this request a list of documents withheld from production, identifying each document by date, addressee(s), author, title and subject matter. In addition, the County should identify those persons who have seen the document or who were sent copies, and state the ground(s) upon which each such document is considered privileged.

If any document called for in this request has been destroyed, the County must include in its response to this request a description of the documents destroyed, identifying each document by date, addressee(s), author, title and subject matter. In addition, the County should state the date of destruction, the identity of the person or persons who

destroyed the document, and the reason the document was destroyed.

D. The words "pertaining to" include referring to, responding to, relating to, connected with, concerning, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

DOCUMENT REQUESTS

1. All documents pertaining to the "Suffolk County Radiological Emergency Response Plan as of March 10, 1982," as supplemented by the letter of April 19, 1982, from Herbert H. Brown to the Atomic Safety and Licensing Board (the March 10 plan), if such documents are not covered by requests 2-12 below.
2. All maps, drawings or other documents concerning placement of tone-activated radios within the Prompt Notification System network.
3. All documents analyzing, studying or otherwise concerning the basis for placement of the tone-activated radios and the effectiveness of such radios.
4. All documents describing procedures for use of the Prompt Notification System including:
 - (a) how it is activated.
 - (b) who may activate it.
5. All documents analyzing, reviewing or otherwise concerning under what emergency conditions the Prompt

Notification System should be used, including documents concerning use of the system early in an emergency for notification of areas where sheltering may not be a viable option.

6. All documents analyzing, studying, or otherwise concerning the quality, adequacy, completeness, or effectiveness of the March 10 plan.
7. All documents to or from Mr. Frank R. Jones, Mr. Lee E. Koppelman, and/or Mr. Robert C. Meunkle regarding the March 10 plan, including any documents discussing the County's decision to abandon preparation of that plan.
8. All documents regarding preparation of the March 10 plan, including any documents indicating the division of responsibility for preparing the plan, the schedule by which the plan was to be completed, and the persons, if any, who were to review the plan.
9. All documents used in preparing the March 10 plan, including any other local emergency response plans obtained by the County from other local governments.
10. All documents analyzing, studying, or critiquing documents used in preparing the March 10 plan.
11. All documents describing additions or revisions to the March 10 plan since March 10, 1982.
12. All documents pertaining to additions or revisions to the March 10 plan since March 10, 1982, including any documents indicating the division of responsibility for preparing the additions or revisions, the

documents addressing the schedule by which the additions or revisions were to be completed, documents relied upon in preparing the additions or revisions, and documents analyzing, studying or critiquing the additions or revisions.

13. All documents pertaining to the County's organization for coping with emergencies that do not involve nuclear power.
14. All documents pertaining to the County's procedures for coping with emergencies that do not involve nuclear power.
15. All documents analyzing, studying or critiquing the County's plan or plans for dealing with emergencies that do not involve nuclear power.
16. All documents relied upon in preparing the County's plan or plans for dealing with emergencies that do not involve nuclear power.
17. All documents analyzing, studying, or critiquing any documents relied upon in preparing the County's plan or plans for dealing with emergencies that do not involve nuclear power.
18. All documents indicating the division of responsibility for preparing the County's plan or plans for dealing with emergencies that do not involve nuclear power, the schedule by which the plan or plans were to be completed, and the persons, if any, who reviewed the plan or plans.

19. All other documents pertaining to the County's plan or plans for dealing with emergencies that do not involve nuclear power.
20. All documents pertaining to the County's organization for coping with emergencies involving the Brookhaven National Laboratory.
21. All documents pertaining to the County's procedures for coping with emergencies that involve the Brookhaven National Laboratory.
22. All documents analyzing, studying or critiquing the County's plan for dealing with emergencies that involve the Brookhaven National Laboratory.
23. All documents analyzing, studying, or critiquing any documents relied upon in preparing the County's plan for dealing with emergencies that involve the Brookhaven National Laboratory.
24. All documents indicating the division or responsibility for preparing the County's plan for dealing with emergencies that involve the Brookhaven National Laboratory, the schedule by which the plan was to be completed, and the persons, if any, who reviewed the plan.
25. All other documents pertaining to emergency planning for emergencies involving the Brookhaven National Laboratory.
26. All documents pertaining to the County's organization for coping with emergencies involving the Millstone Point Nuclear Power Station.

27. All documents pertaining to the County's procedures for coping with emergencies involving the Millstone Point Nuclear Power Station.
28. All documents analyzing, studying or critiquing the County's plan for dealing with emergencies involving the Millstone Point Nuclear Power Station.
29. All documents analyzing, studying, or critiquing any documents relied upon in preparing the County's plan for dealing with emergencies involving the Millstone Point Nuclear Power Station.
30. All documents indicating the division of responsibility for preparing the County's plan for dealing with emergencies involving the Millstone Point Nuclear Power Station, the schedule by which the plan was to be completed, and the persons, if any, who reviewed the plan.
31. All other documents pertaining to emergency planning for emergencies involving the Millstone Point Nuclear Power Station.
32. All documents regarding preparation of the county-wide Radiological Emergency Response Plan (Response Plan) now being developed under Resolution No. 262-82, including any documents indicating the person or persons preparing the plan, the division of responsibility for preparing the plan, the schedule by which the plan will be completed, and the persons who will review the plan.

33. All documents that outline, describe, summarize or contain drafts of the Response Plan or parts of it.
34. All documents analyzing, studying, or critiquing any descriptions, outlines, summaries or drafts of the Response Plan or parts of it.
35. All documents being used to prepare the Response Plan, including but not limited to:
 - (a) consultants' reports.
 - (b) studies or analyses of the topographic area surrounding Shoreham.
 - (c) studies or analyses of the population surrounding Shoreham.
 - (d) other emergency response plans.
36. All documents analyzing, studying, or critiquing documents being used to prepare the Response Plan.
37. All documents to or from the County's Radiological Emergency Response Plan Steering Committee, or individual members of that Committee, including but not limited to:
 - (a) directions or guidelines to be followed by the Committee.
 - (b) schedules for the Committee's work.
 - (c) documents addressing the division of responsibility among Committee members.
38. All documents reflecting any meetings or contacts involving Suffolk County officers, personnel,


contractors, subcontractors, consultants, or other representatives and pertaining to emergency planning.

39. All other documents pertaining to the preparation of the Response Plan or parts of it.
40. All documents pertaining to emergency planning on which Suffolk County will rely in the NRC operating license proceeding for Shoreham.
41. All testimony on emergency planning given by any of Suffolk County's consultants, officials, employees, consultants, or representatives in any proceeding, be it administrative, legislative, or judicial. Such consultants include, but are not limited to, the following:

PRC-Voorhees
Prof. Philip B. Herr
Dr. Kai T. Erikson
Dr. James H. Johnson
Dr. Donald J. Ziegler
Dr. Walter C. Farrel, Jr.
Dr. David Stevenson
Dr. Fred Finlayson
Dr. Robert J. Budnitz
Dr. Edward P. Radford

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY


W. Taylor Reveley, III
James N. Christman
Kathy E. B. McCleskey

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

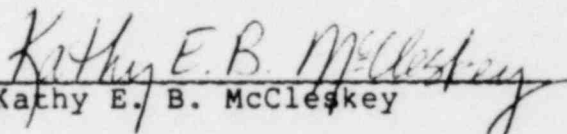
DATED: June 2, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

NOTICE OF APPEARANCE

Please note the appearance of the undersigned, who has been admitted to practice law before the Supreme Court of Virginia, as one of the Applicant's counsel in the above-captioned docket.


Kathy E. B. McCleskey

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

804/788-8701

DATED: June 2, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

NOTICE OF APPEARANCE

Please note the appearance of the undersigned, who has been admitted to practice law before the Supreme Court of Virginia, as one of the Applicant's counsel in the above-captioned docket.


James N. Christman

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

804/788-8368

DATED: June 2, 1982

LILCO, June 2, 1982

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

CERTIFICATE OF SERVICE

I hereby certify that copies of (1) LILCO'S First Request to Suffolk County for Production of Emergency Planning Documents, (2) Notice of Appearance of Kathy E. B. McCleskey, and (3) Notice of Appearance of James N. Christman were served upon the following people by first-class mail, postage prepaid, on June 1, 1982.

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

Secretary of the Commission
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
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Washington, D.C. 20555

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DATED: June 2, 1982


James N. Christman