

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station,
Unit 1)

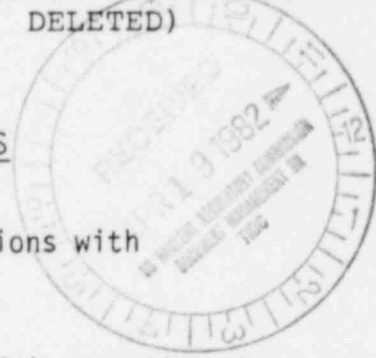
Docket No. 50-322 O.L.

(SAFEGUARDS INFORMATION
DELETED)

SUFFOLK COUNTY SECURITY CONTENTIONS

Suffolk County hereby submits summary security contentions with
safeguards information deleted.

1. LILCO does not comply with 10 C.F.R. Section 73.55(h) regarding the number of armed responders.
2. LILCO has not demonstrated that it meets the high assurance standard of 10 C.F.R. Section 73.55 because it has not demonstrated that its security force can interdict and effectively engage the design basis attackers.
3. LILCO does not comply with 10 C.F.R. Section 73.55(h) regarding liason with local law enforcement.
4. LILCO does not comply with 10 C.F.R. Sections 73.1 and 73.55 because it has failed to identify, characterize, analyze, and prepare for the elements of the design basis threat defined in Section 73.1(a)(1).
5. LILCO does not comply with 10 C.F.R. Section 73.55(b) and Part 73, Appendix B, regarding guard training.
6. The NRC Staff's analysis of the adequacy of LILCO's security arrangements is inadequate, thus providing no basis for a Board finding that the "high assurance" criterion of 10 C.F.R. Section 73.55(a) is satisfied.



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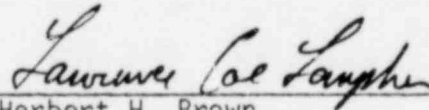
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7. LILCO does not comply with 10 C.F.R. Section 73.55(b) and Part 73, Appendix B, regarding guard weapons.^{*/}

Respectfully submitted,

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April 13, 1982

^{*/}

Additional contentions may be set forth in the Addendum hereto.

ADDENDUM

1. Suffolk County contends that the LILCO procedure concerning the Security Shift Supervisor does not comply with 10 CFR 73.55 (b) or Part 73, Appendix B.
2. Suffolk County contends that the EASI analysis does not confirm LILCO's compliance with 10 CFR 73.55 (a).
3. Suffolk County contends that the secondary alarm station location is unacceptable.
4. Suffolk County contends that the LILCO personnel selection and screening program does not comply with 10 CFR 73.55 (b) and Part 73, Appendix B.
5. Suffolk County contends that the LILCO procedure for response after an intrusion is suspected is inadequate.

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Docket No. 50-322 (OL)

CERTIFICATE OF SERVICE

I hereby certify that copies of the "SUFFOLK COUNTY SECURITY CONTENTIONS" with safeguards information deleted, dated April 13, 1982, have been served to the following on April 15, 1982 by U.S. Mail, first class.

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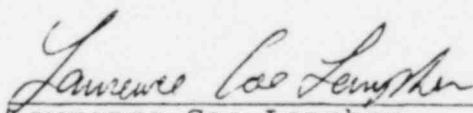
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April 15, 1982