

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power )  
Station, Unit 1) )

Docket No. 50-322 O.L.  
(Emergency Planning  
Proceedings)

SUFFOLK COUNTY'S SECOND REQUEST TO  
LONG ISLAND LIGHTING COMPANY  
FOR PRODUCTION OF  
EMERGENCY PLANNING DOCUMENTS

Pursuant to C.F.R. §2.741, and the Licensing Board's Order, dated April 20, 1982, LILCO is requested by Suffolk County to produce at the Shoreham Nuclear Power Plant (or another agreed upon location) each of the documents set forth below, within thirty (30) days after service hereof. These document requests pertain to the emergency planning and preparedness issues under consideration by the Licensing Board and to whether emergency planning and preparedness for the Shoreham facility complies with 10 C.F.R. §50.47(b) and 10 C.F.R. Part 50, Appendix E.

DEFINITIONS AND INSTRUCTIONS

The definitions and instructions applicable to this request are identical to those contained in "Suffolk County's First Request For Production of Emergency Planning Documents To Long Island Lighting Company" dated May 11, 1982. To

the extent that LILCO may have already provided to Suffolk County any of the documents sought herein in response to a previous discovery request, LILCO should identify such documents by title, date and subject matter and state when such documents were produced.

DOCUMENTS REQUESTED

1. Any testimony on emergency planning given by any of LILCO's consultants, officials, employees, or representatives, or by any persons LILCO intends to present as witnesses on its behalf regarding the emergency planning issues to be litigated pursuant to the Board's April 20, 1982 Order, whether such testimony was before an administrative, legislative or judicial body.
2. All documents discussing, analyzing or concerning the Federal assistance LILCO intends to request and/or utilize in the event of a radiological emergency and the resources it intends to supply to make available to support the Federal response.
3. All documents discussing, analyzing or concerning LILCO's ability to augment its radiological emergency response personnel within thirty minutes of declaration of an emergency at the Shoreham site, including any documents analyzing, discussing or concerning whether LILCO's ability to augment its radiological emergency response personnel within thirty minutes meets the requirements of NUREG 0654.

4. All documents analyzing, discussing or concerning the adequacy of commercial telephone lines to communicate from the Shoreham site or LILCO's emergency response facilities with hospitals, the Coast Guard, the U.S. Department of Energy or other off-site agencies in the event of a radiological emergency.

5. All documents discussing, analyzing or concerning the time required to activate the EOF and make it fully operational following the declaration of an emergency.

6. All agreements with any person or organization to supply seismic offsite information to LILCO's emergency response facilities.

7. All documents or additions to the plans providing the contents of initial and followup messages to offsite authorities.

8. All documents concerning LILCO's plans and schedules for drills and exercises to be conducted in the next seven years including details of the specific areas and emergency planning concerns that each such exercise or drill will address.

9. All documents concerning, discussing or analyzing LILCO's possible use of a mobile radiological laboratory for accident assessment and monitoring.

10. All documents identifying or concerning the instruments to be relied upon for emergency classification including, but not restricted to:

- a. All documents explaining how such instruments will be used in classifying emergencies;

- b. The parameters of the information that will be displayed for each such instrument.

11. All documents identifying or concerning the type and capability of all process and radiological instruments, as well as all monitoring systems, required for initiating emergency measures and conducting assessments.

12. All documents concerning, discussing or analyzing the interim and permanent Safety Parameter Display Systems including:

- a. All parameters to be displayed;
- b. The methods used for data verification;
- c. The ability of the interim and permanent SPDS to provide trending capabilities;
- d. All documents discussing, analyzing or concerning the effects of failure to provide an interim SPDS display in the TSC or EOF;
- e. All documents assessing or discussing the ability of the interim or permanent SPDS to operate during or following an accident, including an earthquake;
- f. All documents reflecting incorporation of human factors principles into the design of the interim and permanent SPDS.

13. All documents discussing, analyzing or concerning incorporation of human factors principles into LILCO's development of its emergency plan and procedures and the instrumentation, control and equipment required for their implementation.

14. All documents discussing, analyzing or concerning the capacity and capability of Central Suffolk Hospital to treat and/or decontaminate injured and contaminated persons.

15. In reply to LILCO's Response of June 14, 1982, to request number 65 in Suffolk County's first request for emergency planning documents, Suffolk County is narrowing its request for contracts or agreements to the following:

- a. All contracts or agreements concerning review, evaluation or assessment of LILCO's radiological emergency response plan by any person or organization, including the plan's compliance with applicable NRC and FEMA regulations.

- b. All documents and correspondence written, developed or created by such person or organization as a result of conducting such a review, evaluation or assessment.

16. All correspondence with the NRC regarding LILCO's radiological emergency plan and LILCO's planning efforts.

Respectfully submitted,

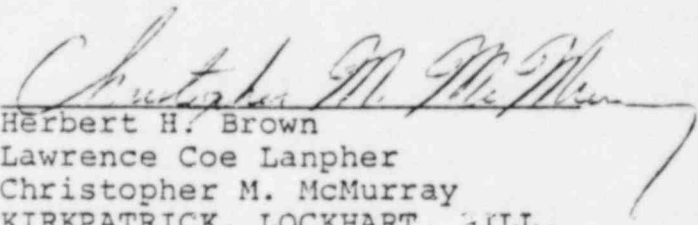
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NUCLEAR REGULATORY COMMISSION

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In the Matter of )  
)  
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(Shoreham Nuclear Power Station, )  
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CERTIFICATE OF SERVICE

I hereby certify that copies of Suffolk County's "Second Request for Long Island Lighting Company for Production of Emergency Planning Documents," dated June 18, 1982 were served to the following on June 18, 1982 by U.S. Mail, first class, except as otherwise noted:

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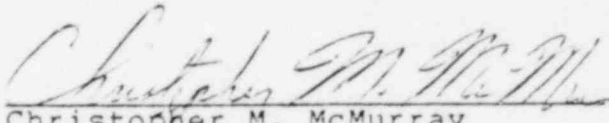
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