

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 14 NO 29

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)
Unit 1))

Docket No. 50-322 O.L.

SUFFOLK COUNTY MOTION
TO STRIKE PORTIONS OF
LILCO TESTIMONY ON SC CONTENTION
28(a)(vi) AND SOC CONTENTION 7A(6)

Suffolk County hereby moves to strike the following portions of the Testimony of John J. Boseman, Raymond M. Crawford, Fred Hayes, John J. Kreps, and Jeffrey L. Smith for the Long Island Lighting Company on Suffolk County Contention 28(a)(vi) and SOC Contention 7A(6) -- Reduction of Challenges to SRV's, dated June 14, 1982:

- a. Question and Answer No. 9, on pages 5-6
- b. Attachment II (Letter SNRC-557 of April 15, 1981 from J. P. Novarro to Harold R. Denton, with attachments)
- c. Attachment III (Letter SNRC-579 of May 29, 1981 from J. P. Novarro to Harold R. Denton, with attachments)


The referenced LILCO testimony and attachments are not relevant to SC Contention 28(a)(vi)/SOC Contention 7A(6), and therefore should be stricken pursuant to 10 CFR §2.743(c).

SC Contention 28(a)(vi) and SOC Contention 7A(6) address the question whether LILCO has complied with Item II.K.3.16 of NUREG-0737 by reducing challenges to safety relief valves. However, the above-referenced portion of LILCO's testimony, as well as Attachments II and III to that testimony, have nothing to do with the reduction of challenges. Rather, they discuss Item II.K.3.44 of NUREG-0737 ("Adequate Core Cooling for Transients with a Single Failure"), the BWR Owners' group evaluation of that Item, and LILCO's submissions to the NRC related to that Item. Thus, Question and Answer No. 9 and Attachments II and III discuss whether or not an event involving a stuck-open relief valve is significant.

Suffolk County submits that the discussion of the effects of an event involving a stuck-open relief valve is irrelevant to the subject at issue in this Contention -- that is, the reduction of the number of challenges to the safety relief valves. Because Question and Answer No. 9 and Attachments II and III concern matters that are not relevant to the subject at issue in SC Contention 28(a)(vi) or SOC Contention 7A(6), Suffolk County submits that they should be stricken.

Respectfully submitted

DAVID J. GILMARTIN
Suffolk County Attorney
PATRICIA A. DEMPSEY
Assistant Suffolk County Attorney
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11788



Herbert H. Brown
Lawrence Coe Lanpher
Karla J. Letsche
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W.
Washington, D.C. 20036
(202) 452-7000

Attorneys for Suffolk County

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CERTIFICATE OF SERVICE

I hereby certify that this 13th day of July, 1982, copies of Suffolk County Motion to Strike Portions of LILCO Testimony on SC Contention 28(a)(vi) and SOC Contention 7A(6) were mailed, first class, postage prepaid to the parties listed below and hand-delivered to those indicated by an asterisk:

Lawrence Brenner, Esq.*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Mr. Peter A. Morris*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Edward M. Barrett, Esq.
General Counsel
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

Mr. Brian McCaffrey
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

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

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

W. Taylor Reveley III, Esq.*
Hunton & Williams
P.O. Box 1535
707 East Main St.
Richmond, Virginia 23212

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

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

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

Joel Blau, Esq.
New York Public Service Commission
The Governor Nelson A. Rockefeller
Building
Empire State Plaza
Albany, New York 12223

David H. Gilmartin, Esq.
Suffolk County Attorney
County Executive/Legislative Bldg.
Veterans Memorial Highway
Hauppauge, New York 11788

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

Docketing and Service Section
Office of the Secretary
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

Stuart Diamond
Environment/Energy Writer
NEWSDAY
Long Island, New York 11747

Cherif Sedky, Esq.
Kirkpatrick, Lockhart,
Johnson & Hutchison
1500 Oliver Building
Pittsburgh, Pennsylvania 15222

DATE: July 13, 1982

Mr. Jeff Smith
Shoreham Nuclear Power Station
P.O. Box 618
North Country Road
Wading River, New York 11792

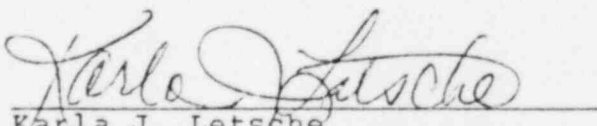
MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Hon. Peter Cohalan
Suffolk County Executive
County Executive/Legislative
Building
Veterans Memorial Highway
Hauppauge, New York 11788

Ezra I. Bialik, Esq.
Assistant Attorney General
Environmental Protection Bureau
New York State Department of
Law
2 World Trade Center
New York, New York 10047

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

Matthew J. Kelly, Esq.
Staff Counsel, New York
State Public Service Comm.
3 Rockefeller Plaza
Albany, New York 12223


Karla J. Letsche
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., 8th Floor
Washington, D.C. 20036