

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
LICENSING & SAFETY
BRANCH

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 WATER HAMMER
PROCEDURES AND TRAINING

In response to statements by the Board on June 1, 1982 (Tr. pages 2681-83), LILCO submitted on July 9, 1982 additional direct testimony relating to Suffolk County Contention 4 -- Water Hammer. The Board's statements indicated that any such additional testimony was to address the issues of procedures, training, in-service testing, and surveillance relating "specifically" to water hammer. (Tr. 2682). Although some portions of the July 9 testimony do relate to water hammer procedures and training, large portions of that testimony have nothing to do with water hammer. Thus, the following portions of the July 9 testimony should be stricken because they go beyond the scope of the additional testimony permitted by the Board:

- (a) The answer to Question 6 (pages 3-4), except the first sentence; and
- (b) Questions and Answers 7 through 12 (pages 4-7).

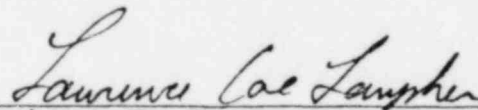
These portions of the LILCO testimony should be stricken because they do not deal with the issue of how water hammer is addressed in SNPS procedures and training, and therefore the testimony is irrelevant to SC Contention 4 and goes beyond the limited scope permitted by the Board on June 1. Indeed, this portion of LILCO's additional SC 4 testimony has nothing to do with water hammer. Rather, it contains a description, in the most general terms, of how Shoreham pre-operational test procedures and plant procedures are prepared and reviewed. It does not include any information that is in any way probative of how -- or if -- such procedures take into account the possible occurrence, or prevention or mitigation of water hammer events. Indeed, Questions and Answers 4 and 5, as well as Question 6 of the LILCO additional testimony, indicate that Shoreham does not have procedures specifically for the prevention or minimization of water hammer, nor do the Shoreham operating procedures indicate

that specific steps are included for the purpose of minimizing or precluding water hammer. Question and Answer 3 attempts to explain how the Shoreham procedures purport to address water hammer concerns. It is evident that the information contained in Answer 6 and Questions and Answers 7 through 12, add nothing to that explanation that is pertinent to water hammer.

Therefore, those portions of the LILCO testimony are irrelevant to the limited issues which this additional testimony was designed to address, Suffolk County submits that those portions of the LILCO testimony should thus be stricken.

Respectfully submitted,

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July 20, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
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LONG ISLAND LIGHTING COMPANY)
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CERTIFICATE OF SERVICE

I hereby certify that copies of the "SUFFOLK COUNTY MOTION TO STRIKE PORTIONS OF LILCO TESTIMONY ON WATER HAMMER PROCEDURES AND TRAINING" were served to the following by U.S. Mail, first class, except as otherwise noted, on the 20th day of July, 1982.

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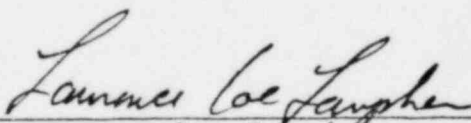
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