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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket No. 50-322 O.L.

I.

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II.

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.

Response. Provided.

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 [sic] to support the Federal response.

Response. Provided.

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.

Response. See the Emergency Plan, Shoreham Nuclear Power Station (LILCO Plan), Chapter 5.

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.

Response. These documents were provided in response to the County's first document request. See also the LILCO Plan at 7-2.

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.

Response. See the LILCO Plan at Section 7.1.3.

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

Response. None.

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

Response. Original drafts of these documents were provided in response to the County's first document request. The most recent drafts are included in Appendix F of the LILCO Plan.

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.

Response. See the Shoreham Nuclear Power Station Emergency Plan Training Manual, Volume II, Parts A and B (Exercises and Drills).

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

Response. None.

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.

Response. The information is contained in the EAL Draft Procedure, in SP 69.010, both previously provided to the County, and in Chapter 4 of the LILCO Plan.

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.

Response. Provided.

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.

Response. Documents responsive to (a) through (f) are provided. The request for "all documents concerning, discussing, or analyzing" the SPDS is overbroad. Therefore, LILCO objects to that portion of the request.

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.

Response. See the documents provided in response to 12(f), above.

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

Response. Provided.

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:

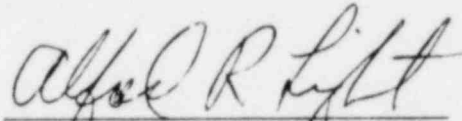
- a. All contracts or agreements concerning review, evaluation or assessment of LILCO's radiological emergency response plan by any person or organization, including the plan's compliance with applicable NRC and FEMA regulations.
- b. All documents and correspondence written, developed or created by such person or organization as a result of conducting such a review, evaluation or assessment.

Response. Provided. Documents provided in response to (a) will be available for inspection at LILCO's offices at a date and time agreeable to the parties.

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

Response. These documents are available in the public document room.

Respectfully submitted,



W. Taylor Reveley, III  
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for Kathy E. B. McCleskey

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DATED: July 20, 1982

CERTIFICATE OF SERVICE

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

I hereby certify that copies of LILCO'S RESPONSE TO  
SUFFOLK COUNTY'S SECOND REQUEST FOR PRODUCTION OF EMERGENCY  
PLANNING DOCUMENTS TO LONG ISLAND LIGHTING COMPANY were served  
upon the following by first-class mail, postage prepaid, or by  
Federal Express (as indicated by an asterisk), on July 20,  
1982.

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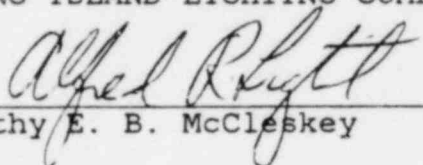
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Respectfully submitted,

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DATED: July 20, 1982