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FILE NO.  
DIRECT DIAL NO. 804 788-

June 3, 1983

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

Dr. James H. Carpenter  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
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Dr. Peter A. Morris  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Long Island Lighting Company  
Shoreham Nuclear Power Station, Unit 1  
Docket No. 50-322(OL)

Dear Administrative Judges:

Enclosed is "LILCO's Response to Suffolk County Submission of Data Regarding Shoreham Diesel Generators." Attached to LILCO's Response is an Affidavit of Edward J. Youngling, Startup Manager for the Shoreham Nuclear Power Station. It is LILCO's understanding that the NRC Staff also will be filing a response to the County's pleading.

In addition, LILCO received on June 1 "Suffolk County's Response to the LILCO and Staff Oppositions to Motion for Leave to File a New Contention Concerning the Shoreham Emergency Diesel Generators." The County's "Response" has four noteworthy aspects: (1) it is an unwarranted and scurrilous attack on LILCO, LILCO's counsel and the NRC Staff that falsely accuses

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those parties of a "coverup" of information concerning the diesel generators; (2) it improperly uses the authorities cited; (3) it alleges as fact, in both the "Response" and Mr. Goldsmith's affidavit, matters which are either untrue or which, at best, may be subject to differing opinions; and (4) it should in any event, have been filed in support of the County's original motion for leave to file a contention.

The County's unwarranted attack on LILCO, LILCO's counsel and the NRC Staff is totally without basis and does not deserve extended response. Response to the second and third aspects will demonstrate that there are no issues of fact to litigate and that the County's reliance on the authorities cited is misplaced. LILCO hereby requests the Board's leave to submit such a response.

LILCO is aware of the Board's desire for consolidated responses; however, in this instance, LILCO believes that the facts in Mr. Youngling's affidavit should come to the immediate attention of the Board, given the gravity of the County's allegations.

Sincerely,

*T. S. Ellis, III /a.s.l.*

T. S. Ellis, III

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