

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

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In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

Docket No. 50-322

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

SUFFOLK COUNTY INTERROGATORIES
TO LONG ISLAND LIGHTING COMPANY

Pursuant to 10 CFR §2.740b, LILCO is requested by Suffolk County to answer separately and fully, under oath, each of the interrogatories set forth below, within fourteen (14) days after service hereof.

DEFINITIONS AND INSTRUCTIONS
FOR ANSWERING INTERROGATORIES

- A. Wherever appropriate, the singular form of a word shall be interpreted as plural and vice versa.
- B. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope hereof any information (as defined herein) which might otherwise be construed to be outside the scope of these discovery requests.
- C. Wherever appropriate, the masculine form of a word shall be interpreted as feminine and vice versa.
- D. The term "person" includes any natural person, firm, partnership, educational institution, joint venture,

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corporation, and any foreign or domestic government organization (including military and civilian), or group of natural persons or such entities.

E. The term "information" shall be expansively construed and shall include, but not be limited to, facts, data, theories, analyses, opinions, images, impressions, concepts and formulae.

F. The term "document" means any tangible thing from or on which information can be stored, recorded, processed, transmitted, inscribed, or memorialized in any way by any means regardless of technology or form and including but not being limited to: papers, books, accounts, newspaper and magazine articles, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, drawings, blueprints, plans, specifications, manuals, procedures, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings, occurrences, or transactions, affidavits, transcripts of depositions or hearings, statements, summaries, opinions, reports, tests, experiments, analyses, evaluations, contracts, agreements, ledgers, journals, books or records of account, receipts, statistical records, desk calendars, appointment books, diaries,

lists, tabulations, sound recordings, computer printouts, data processing input and output, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing. Each copy of a document which contains any separate notations or writings thereon, and each draft of a document which differs in any way from the final version of the document, shall be deemed to be a separate document for purposes of these discovery requests. (Versions of a document which differ in clearly non-substantive and unimportant ways from other versions of the document do not need to be considered a separate document.)

G. The term "communication" includes every exchange of information by any means.

H. The term "LILCO" or "LILCO personnel" means Long Island Lighting Company, and any affiliate, agent, employee, consultant, contractor, technical advisor, representative (including, without limitation, attorneys and accountants and their respective agents and employees), or other person acting for or on behalf of LILCO, or at LILCO's direction or control, or in concert with LILCO or assisting LILCO.

I. The term "Shoreham" means the Shoreham Nuclear Power Station, Unit 1, any part thereof, or any structure, system, component, instrumentation, equipment, or materials included in, or intended to be included in Shoreham.

J. The term "contractor" means any person, not affiliated with LILCO, who performed work concerning Shoreham, on behalf of LILCO and/or pursuant to a contract with LILCO. The term "subcontractor" means any person, not affiliated with LILCO, who performed work of any kind concerning Shoreham, on behalf of a contractor with whom the person was not affiliated, and pursuant to a contract with such contractor. A person, other than a contractor, who contracts with a subcontractor shall be deemed a subcontractor.

K. The words "concerning," "concerns" or any other derivative thereof, include referring to, responding to, relating to, pertaining to, connected with, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

L. Whenever in the interrogatories there is a request to identify a person that is a natural person, set forth:

- (1) his name;
- (2) his last known residence address;
- (3) his last known business address;
- (4) his last known employer;
- (5) his title or position;

- (6) his areas of responsibility;
- (7) his business, professional, or other relationship with LILCO; and
- (8) if any of the above information has changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time referenced in the interrogatory.

M. Whenever in the interrogatories there is a request to identify a person that is not a natural person, state:

- (1) the full name of such person;
- (2) the nature or form of such person, if known;
- (3) the address of its principal place of business or the principal place where such person is to be found;
- (4) whether LILCO has or has had any relationship or affiliation with such person, its affiliates or subsidiaries, and, if so, a description of such relationship; and
- (5) if any of the above information has changed subsequent to the time period referenced in a particular interrogatory, set forth in the

answer, and label appropriately, current information as well as the information applicable to the time referenced in the interrogatory.

N. Whenever in the interrogatories there is a request to identify or describe a document:

(1) set forth:

- (a) the date of the document;
- (b) the type or nature of the document;
- (c) the length of the document;
- (d) the location of the document;
- (e) a brief description of the contents of the document; and

(2) identify:

- (a) the author, signatories and any other person who originated, prepared or participated in the preparation of the document;
- (b) all persons to whom the document was addressed and all persons to whom copies of the document were to be or have been sent; and
- (c) all persons whom LILCO knows or believes to have possession, custody or control of the document and of any copies thereof.

O. Whenever in the interrogatories there is a request to identify a communication:

(1) state:

- (a) the date of the communication;
- (b) the place of the making and the place of receipt of the communication;
- (c) the type and means of communication;
- (d) the substance of the communication; and

(2) identify:

- (a) each person making the communication, and his location at the time the communication was made;
- (b) each person to whom the communication was made, and his location at the time the communication was made;
- (c) all other persons present during, participating in, or receiving the communication and the location of each such person at the time;
- (d) each document concerning such communication; and
- (e) each document upon which the communication is based or which is referred to in the communication.

P. With respect to each interrogatory answer, identify each document which forms a basis for the answer given, is relied upon or which was reviewed, in whole or in part, in preparing the answers, or which in any way corroborates or concerns the answer given. A document to be so identified may be produced in lieu of the elements of such identification. In such case, however, please identify the document in the answer to the interrogatory in sufficient detail so that Suffolk County can readily locate the document among all documents produced by LILCO.

Q. Where exact information cannot be furnished, estimated information should be supplied to the extent possible. Where estimated information is used, the answer should so state and should indicate the basis upon which the estimate was made. If possible, the upper and lower boundaries of the estimate should be given.

R. If LILCO objects to or claims a privilege (attorney-client, work product, or otherwise) with respect to any interrogatory, in whole or in part, or seeks to withhold documents or information because of the alleged proprietary nature of the data, set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Board to determine the validity of

the objection or claim of privilege. This description by LILCO should include with respect to any document: the author, addressor, addressee, recipients of indicated and "blind" copies, date of preparation, subject matter, purpose for which it was prepared, number of pages, attachments or appendices, all persons to whom distributed, shown or explained, present custodian, all persons believed to have a copy of the document, and the nature of the privilege or objection asserted.

S. If any document called for herein has been destroyed, that document is to be identified as in "R" above. LILCO also is requested to state the date of destruction, place and manner of destruction, persons authorizing destruction and person destroying the document.

T. Information furnished in answer to an interrogatory may be furnished by reference to the answer provided for another interrogatory, provided the other referenced answer fully responds to each request for information contained in the interrogatory. Separate answers should be provided for each interrogatory and each subpart thereof, unless a complete answer to each interrogatory may best be presented through combining answers. The County is interested in this regard in receiving the relevant data asked for and any means of providing such data which is less time-consuming for the responder but which

is nevertheless complete will satisfy the intent of these interrogatories.

U. Each interrogatory shall be construed to impose upon LILCO the continuing obligation to supplement the answer thereto as required by the NRC's Rules of Practice.

V. As used herein:

- (1) "Analysis" means research, investigation, audit, inspection, review, evaluation, testing, monitoring, or any other method or form of examining data and/or forming conclusions or recommendations.
- (2) "NRC" or "NRC Staff" means the Nuclear Regulatory Commission and its staff, any division or section thereof, any staff member thereof, or any agent, consultant, contractor, technical advisor, employee, or representative (including but not limited to attorneys and accountants and their employees and agents) of the NRC.
- (3) "FEMA" means the Federal Emergency Management Agency and its staff, any division or section thereof, any staff member thereof, or any agent, consultant, contractor, technical advisor, employee, or representative (including but not

limited to attorneys and accountants and their employees and agents) of FEMA.

W. If LILCO is unable to answer any interrogatory or portion thereof, identify the person whom LILCO believes has the knowledge or information which the interrogatory addresses.

INTERROGATORIES

1. Describe the "specified communications equipment designed to ensure the prompt transmission of information to WALK for dissemination to public," as stated in LILCO's letter of agreement with WALK. Has such equipment been installed and made operational? If not, what is the schedule in this regard? Provide copies of all documents concerning such equipment, its installation, and its operation.
2. Has WALK installed an 80 DW AGP for backup generation? If not, when will it be installed? Who is the manufacturer of the backup generator? Provide all documents concerning the 80 DW AGP to be used by WALK.
3. LILCO's letters of intent with four bus companies note that the agreements are subject to the prior rights of local school districts under contract to the bus companies. For each bus company with which LILCO has an agreement identify:

- a. The school districts which have prior rights to the buses.
 - b. The number of buses to which each school district has prior rights.
4. On what basis is it estimated that, on average, route buses will be 74 percent full after completing a route?
See App. A at IV-86b, Rev. 1.
5. Explain the basis for all time estimates presented on page IV-86b, Rev. 1, of Appendix A. Provide all documents concerning such estimates, including those upon which the estimates are based.
6. Identify the persons or entities responsible for analyzing and/or deriving the time and vehicle requirement estimates set forth at pages IV-190 to 192, Rev. 1, of Appendix A. Provide copies of all documents concerning such estimates, including those upon which the estimates are based.
7. Describe all compensation, benefits, or incentives of any type, if any, that LILCO has offered or given, or expects to offer or give to LILCO employees who elect to become emergency workers under the LILCO Plan.
8. Describe all compensation, benefits or incentives of any type that LILCO has offered or expects to offer to

non-LILCO employees who elect to become emergency workers under the LILCO Plan.

9. In its "Answer to Suffolk County's Motion For Rejection of LILCO Transition Plan And For Certification To The Commission," dated August 8, 1983, LILCO stated that thirty people were engaged full time in nothing but performing the tasks needed to put in place a workable emergency plan. Identify those thirty individuals.
10. For each person identified in response to the previous question, identify (a) his or her LILCO position; (b) his or her LERO position, if any; and (c) the tasks he or she is responsible for performing in connection with putting the LILCO Plan in place.
11. State the total number of individuals to whom the "LILCO Response Organization Participation Form" was given. Identify the basis upon which such individuals were selected or identified.
12. Identify and describe all information that has been or is intended to be provided to LILCO personnel, subsequent to February 1, 1982, concerning emergency preparedness at Shoreham, including, but not limited to, any information concerning participation of LILCO employees in offsite emergency response, LERO, or LERO training. Identify the

- persons or entities who provided such information to LILCO personnel and describe the means by which it was provided.
13. It is not clear from LILCO's response to Suffolk County Request 11 of July 18, 1983 whether that response referred to documents filed with the Disaster Preparedness Commission or Governor Cuomo's Shoreham Commission. Please clarify this ambiguity and provide copies of all documents sent to or received from the Disaster Preparedness Commission.
 14. Identify all non-LILCO personnel who have been asked or invited by LILCO to participate in (a) Shoreham-related offsite emergency response; and (b) training related to offsite emergency response.
 15. How much fuel can be stored in each of the sixteen locations identified by LILCO in response to Suffolk County Request 32?
 16. Identify street addresses for each of the locations of the identified fuel storage locations.
 17. Identify the portion of Section 3.5 of the Plan to which LILCO's Response to Suffolk County Request 61 of July 18, 1983 refers. Provide copies of all documents concerning the dose projection update procedures referenced in that response.

18. Will LILCO emergency workers be compensated for time spent working during a Shoreham emergency? If so, in what form and how much?
19. Will non-LILCO emergency workers be compensated for time spent working during a Shoreham emergency? If so, who will pay them, in what form will they be compensated, and how much will they be compensated?
20. Are the "fuel trucks" identified by LILCO in the last paragraph of its response to Suffolk County Request 32 the same trucks as the "field trucks (gasoline)" identified in the first sentence of that response?
21. Identify all communications Elaine B. Robinson has made or received concerning handicapped persons in the EPZ.
22. Does LILCO assert that there are no documents concerning the survey entitled "Marketing Evaluations: Shoreham Residential Home Construction Study (#705)," other than the survey questionnaire and those already provided to Suffolk County? If such documents exist, provide copies.
23. Identify by date, location and proceeding all prior testimony concerning emergency preparedness given by each of the persons LILCO intends to call as a witness, including those identified in response to Suffolk County Request 1 of July 18, 1983, before any judicial, administrative, or legislative body, including deposition testimony.

24. Define the following terms as used by LILCO in its response to Suffolk County Request 77 of July 18, 1983.

- (a) Received
- (b) In hand
- (c) Installed
- (d) On hand
- (e) In place
- (f) Operational

In particular, clarify the differences, if any, among the status indicated by the terms "Received," "In hand," and "On hand;" and the differences, if any, among the status indicated by the terms "Installed," "In place," and "Operational."

25. In its Response to Suffolk County Request 20 of July 18, 1983, LILCO identified only a report to be produced by Pickard, Lowe and Garrick, which was provided on August 17. Are there no documents that are responsive to Suffolk County Request 20 other than the report produced by Pickard, Lowe & Garrick? If other such documents exist, provide copies.
26. Identify the locations, including street addresses, at which each of the fuel trucks identified in LILCO's response to Suffolk County Request 32 of July 18, 1983 is stored.

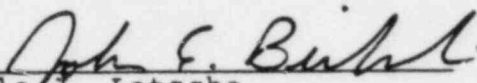
27. Does LILCO have permits concerning automotive fuel other than storage permits? If yes, provide copies of all such permits.
28. With respect to LILCO's response to Suffolk County Request 85, describe in detail the manner in which LILCO "updated" the information allegedly provided by the County including but not limited to, all tests, analyses, measurements, assumptions and literature used in this regard. Were all documents concerning the "updating" process included in the index provided by counsel on August 10, 1983? If not, provide copies of all such documents not included in that index.
29. Do LILCO and its experts rely on any documents, other than those identified in LILCO's response to Suffolk County Request 86 of July 18, 1983, to support LILCO's selection of the boundaries of the 10-mile EPZ? If there are other documents, provide copies.
30. On what basis are the "selected" persons, to be equipped with pagers, determined? (See Figure 3.3.6, Revision 1). Who is responsible for making such determination? Provide copies of all documents concerning (a) the determination that only "selected" persons should be equipped with pagers, and (b) the determination as to which LERO workers will be or have been "selected."

31. Identify the relocation centers for each school in the 10-mile EPZ other than those in the Shoreham-Wading River school district. (See page 3.6-7, lines 17-18, LILCO Transition Plan Revision 1)
32. Identify and provide a copy of the "emergency education information" that will be provided to communities outside the EPZ. (See page 3.8-2, lines 37-38, LILCO Transition Plan, Rev. 1). Identify the communities to which such information will be provided.
33. Describe the means by which the emergency information discussed in the question above will be provided.
34. Has the public information brochure been revised subsequent to the version sent out with Revision 0 of the Plan? (See LILCO's Objections to Revised Emergency Planning Conventions at 18). Provide a copy of the revised brochure if one exists.

Respectfully submitted,

Dated: August 19, 1983
Washington, D.C.

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