

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

Before the Atomic Safety and Licensing Board <sup>82</sup>AUG 22 A10:07

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power Station,  
Unit 1) )

Docket No. 50-322

SUFFOLK COUNTY REQUEST FOR  
PRODUCTION OF DOCUMENTS BY  
LONG ISLAND LIGHTING COMPANY

Pursuant to 10 CFR §2.741, LILCO is requested by Suffolk County to produce for inspection and copying, at the offices of Kirkpatrick, Lockhart, Hill, Christopher & Phillips, the documents specified below that are within the possession, custody, or control of LILCO.

Definitions and Instructions  
For Document Production

The definitions and instructions applicable to these Requests are the same as those set forth in Suffolk County Interrogatories to Long Island Lighting Company, filed simultaneously herewith, and hereby incorporated by reference, except that subparts L through P, and W, of such Definitions and Instructions are not applicable to these Requests.

### Requests

1. Provide a copy of the mailing list or lists for LILCO's "Keeping Current" newsletter.
2. Provide copies of all documents, other than those already provided, concerning the preparation of the LILCO Transition Plan and any revisions thereto.
3. Provide copies of all documents concerning evacuation time estimates, traffic congestion or conditions, roadway capacities, public mobilization, and evacuation headways in the event of a radiological emergency at Shoreham, other than those identified in the index of documents available for review at KLD, provided by counsel for LILCO on August 10, 1983.
4. Provide an up-to-date resume of, and all studies, papers, articles, reports, books, and other such documents, published or unpublished, concerning emergency planning, authored or prepared by, each of the persons LILCO intends to call as a witness, including those identified in response to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.
5. Provide copies of all remarks or statements, read as part of LILCO's presentation to Governor Cuomo's Shoreham Commission at the Commission's hearing on June 28, 1983, other than the presentation by Matthew Cordaro.

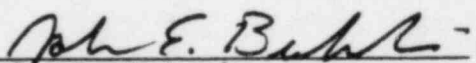
6. Provide copies of all training materials, and procedures, manuals or other materials used by LILCO or its employees in preparing for, or responding to, non-nuclear emergencies.
7. Provide copies of all documents that were or are intended to be distributed to LILCO personnel subsequent to February 1, 1982, concerning emergency planning at Shoreham, including, but not limited to, documents concerning participation of LILCO employees in offsite emergency planning, LERO, or LERO training.
8. Provide copies of all documents concerning Reuben Goldblatt's derivation of estimated route times for evacuation buses, including documents upon which such estimates were based.
9. Provide copies of all documents analyzing, studying, evaluating or otherwise concerning the notification and evacuation of elderly and handicapped persons within the EPZ.
10. Provide copies of LILCO's agreements with Texaco and Agway referred to in LILCO's response to Suffolk County Request 32 of July 18, 1983, and provide copies of all documents concerning either or both of those agreements.

11. Provide copies of all communications between LILCO and the New York Telephone Company concerning services relating to emergency preparedness at Shoreham.
12. In its response to Suffolk County Request 94 of July 18, 1983, LILCO referred to "documents relied on in preparation of Appendix A." Identify such documents, and provide copies.
13. Provide copies of all "periodic newsletters mailed to the entire EPZ population" subsequent to February 1, 1982.  
(See response to first NSC Request 10).

Respectfully submitted,

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

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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) )

OFFICE OF SECRETARY  
DOCKETING & SERVICE

Docket No. 50-322  
(Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of Suffolk County Interrogatories to Long Island Lighting Company and Suffolk County Request for Production of Documents by Long Island Lighting Company have been sent to the following this 19th day of August, 1983 by U.S. mail, first class, except as otherwise noted:

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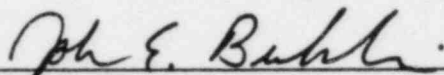
\*By Federal Express

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DATED: August 19, 1983