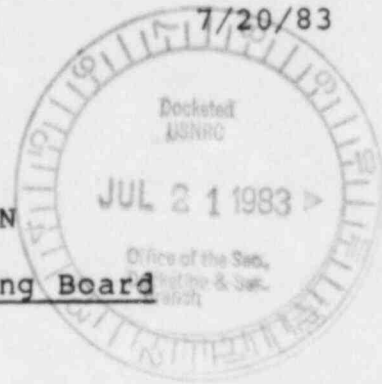


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station,
Unit 1)

POCKET NUMBER
PROD. & UTIL. FAC. 50-322.01-3

Docket No. 50-322 O.L.
(Emergency Planning)

SUFFOLK COUNTY RESPONSE TO NRC STAFF AND LILCO
OPPOSITIONS TO COUNTY MOTION FOR LEAVE TO FILE
CONTENTIONS REGARDING ONSITE EMERGENCY PREPAREDNESS

On June 27, 1983, Suffolk County moved to file contentions regarding the adequacy of LILCO's onsite emergency preparedness. See Suffolk County Motion for Leave to File Contentions Regarding Onsite Emergency Preparedness (the "Motion"). Appendix A to the Motion contained six draft County contentions. On July 8 and 13, 1983, respectively, LILCO and the Staff opposed the County Motion.^{1/} Pursuant to the Board's oral ruling on July 13, 1983 (Tr. 47), the County hereby responds and demonstrates that the Motion should be granted.

^{1/} See LILCO's Answer Opposing the Suffolk County Motion for Leave to File Contentions Regarding Onsite Emergency Preparedness, July 8, 1983 ("LILCO Opposition"); NRC Staff's Opposition to Suffolk County Motion for Leave to File Contentions Regarding Onsite Emergency Planning, July 13, 1983 ("Staff Opposition").

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The LILCO and Staff Oppositions are premised on common bases. First, LILCO and the Staff argue that the contentions do not allege deficiencies in LILCO's onsite plan but rather raise issues which solely concern the adequacy of offsite emergency preparedness. They argue, therefore, that the contentions do not need to be resolved prior to a decision on LILCO's low power motion. Second, LILCO and the Staff argue that the County is barred from submitting onsite contentions as a result of the Board's earlier action dismissing Phase I emergency planning contentions. See Memorandum and Order Confirming Ruling on Sanctions for Intervenors' Refusal to Comply with Order to Participate in Prehearing Examination, LBP-82-115, December 22, 1982 (the "Dismissal Order"). Finally, the Staff and LILCO also argue that the County's contentions should be dismissed as untimely.^{2/}

^{2/} LILCO also argues that the County cannot present contentions which involve the County's February 17, 1983 Resolution 111-1983, wherein the County determined not to adopt or implement any emergency response plan. LILCO's argument appears to be that the County's action outside the NRC forum and undertaken pursuant to state and local laws is a violation of NRC regulations. See LILCO Opposition at 18-20. LILCO presents no basis for this argument. At any rate, the LILCO argument about whether the County should have reached the decision it made in Resolution 111-1983 is not pertinent. The County has identified specific deficiencies in the LILCO Transition Plan. The fact that LILCO objects to County Resolution 111-1983 has nothing to do with the issue whether the onsite plan is adequate and accurate.

Each basis urged by LILCO and the Staff for denying the County's contentions must be denied.

-- The County's contentions do allege inadequacies in the LILCO onsite emergency plan. In fact, in each contention the County alleges that a misstatement of fact exists in the LILCO plan, which renders the plan inadequate and incapable of implementation. A misstatement of fact in the onsite plan clearly does constitute a deficiency in the applicant's emergency preparedness and thus is properly termed an onsite planning issue. Further, in accordance with 10 C.F.R. § 50.47(d), each of the contentions submitted by the County involves an issue relating to onsite preparedness and the coordination of onsite and offsite preparedness which must be resolved prior to a decision on LILCO's low power motion.

-- The Board's December 22, 1983 Dismissal Order does not bar the filing of these contentions. The issues now raised by the County are not Phase I issues because they were not capable of being resolved during the Phase I proceeding. Thus, while these issues must be resolved prior to any low power licensing decision, they are properly Phase II issues which are not subject to the Dismissal Order.

-- The County's filing of onsite contentions is timely. First, since these are Phase II issues, the submission of these

contentions in June 1983 was consistent with the Board's orders. Further, the County has proceeded diligently to bring these issues before the Board. The Staff and LILCO suggest that the County did nothing to bring the new circumstance (County adoption of Resolution 111-1983) to the Board's attention until June 27, 1983. In fact, however, the County proceeded in February 1983 to move to terminate the entire proceeding. That motion was not finally resolved by the Commission until May 12, 1983. Thereafter, the County promptly filed the contentions on the onsite issues, which contentions could only be filed after review of LILCO's revised onsite plan and LILCO's new offsite plans, submitted by LILCO in the latter part of May 1983.

I. The County Contentions Involve Inadequacies In LILCO's Onsite Emergency Response Plan

LILCO and the Staff both argue that the County's contentions are not onsite contentions at all but rather only raise issues concerning the adequacy of offsite preparedness. LILCO and the Staff argue further that the contentions also do not involve any offsite emergency preparedness elements that need to be assessed prior to issuance of a low power operating license. See LILCO Opposition at 4-6; Staff Opposition at 20-29. The County disagrees.

First, the County's contentions directly allege factual misstatements in LILCO's onsite emergency response plan. For instance, Contention B points out that the LILCO onsite plan specifies that emergency notifications to local offsite authorities will be made through the Suffolk County Emergency Operations Center. However, that County facility is not available for coordination with the LILCO onsite plan. Thus, the LILCO plan, in asserting that the County facility will be available, is in error. Clearly, an error in the onsite plan does constitute an onsite planning deficiency.

The Staff and LILCO have attempted to make the County's contentions into so-called "offsite" issues by focusing on supplementary information contained in the draft contentions filed by the County on June 27. See LILCO Opposition, Attachment at 6-23; Staff Opposition at 26-27.^{3/} This supplementary information in each instance refers to the recent LILCO Transition

^{3/} For instance, with respect to Contention A, LILCO and the Staff construe the contention as alleging only inadequacies in LILCO's Transition Plan. However, the inadequacies in the LILCO Transition Plan were included in the supplementary information to the contention to point out that the deficiencies in the onsite plan had not been cured. The Contention in fact does not involve the Transition Plan but rather the deficiency in the LILCO onsite plan. This fact is made clear in the revised onsite contentions attached hereto as Appendix 1.

Plan in order to highlight the deficiency in the onsite plan. As a result, both the Staff and LILCO have repeatedly misstated what the contentions in fact are alleging. To eliminate the apparent confusion, the County has revised the Contentions to be shorter and to delete the supplementary information and cross references to the other contentions filed by the County.^{4/} These revised contentions, attached hereto as Appendix 1, allege in each case that a specific deficiency exists in the LILCO onsite plan. Thus, these are properly characterized as deficiencies in the onsite plan.^{5/}

LILCO and the Staff also argue that the deficiencies alleged by the County do not constitute issues which must be resolved prior to ruling on LILCO's Motion for a low power

^{4/} The County also has deleted Contention C regarding training. Further, in response to a LILCO comment, the County has added certain NUREG 0654 citations.

^{5/} LILCO has also asserted "basis" and "specificity" objections to certain of the County's contentions. See LILCO Opposition at 21-23. The County believes these objections are unfounded, since the contentions set forth in considerable detail precisely why LILCO's onsite plan is deficient. At any rate, as redrafted and clarified, the contentions clearly meet the NRC's requirements. For a further discussion of the specificity and basis requirements under NRC practice, see pages 7-15 of Suffolk County's Response to LILCO's Objections to Intervenor's Consolidated Emergency Planning Contentions and to NRC Staff Response to Draft Emergency Planning Contentions, dated July 12, 1983.

operating license. They assert that the deficiencies in the LILCO onsite plan in fact constitute problems with offsite emergency response and that under 10 C.F.R. § 50.47(d), only a review of the applicant's onsite plan is contemplated. See LILCO Opposition at 4. Under this view, factual misstatements in the onsite plan -- such as an erroneous statement in the onsite plan that a particular County facility will be available for communications (see Contention E) -- are matters which, as a matter of law, can be ignored for purposes of a low power license.

The County strongly disagrees. First, under Section 50.47(d), the NRC must assess an applicant's plan against pertinent standards of 10 C.F.R. § 50.47(b). This means that "a finding as to the adequacy of onsite emergency planning and preparedness is required" 47 Fed. Reg. 30,232 (July 13, 1982). Suffolk County submits that there can be no finding of adequate onsite planning and preparedness when the onsite plan in fact is inaccurate.

Second, under 10 C.F.R. § 50.47(d), there are certain offsite emergency preparedness issues which must be resolved prior to issuance of a low power operating license. These involve assessment of compliance with 10 C.F.R. §§ 50.47(b)(3), (5), (6), (8), (9), (12), and (15). See 47 Fed. Reg. 30,232,

30,234 (July 13, 1982). Each of the County contentions involves one or more of these planning elements and thus must be resolved prior to ruling on a low power license.

LILCO asserts, however, that only offsite elements of LILCO's onsite plan must be assessed under Section 50.47(d). LILCO does not believe any assessment need be made under Section 50.47(d) to determine whether the offsite elements with which the onsite plan interfaces are in fact in place and functioning. Thus, LILCO argues that the Board can ignore the question whether any necessary coordination exists between the onsite plan and offsite plans or entities with which the onsite plan allegedly interfaces. See LILCO Opposition at 4-5.

LILCO again is mistaken. When Section 50.47(d) was first proposed, the NRC suggested a rule more in keeping with LILCO's interpretation. Thus, after specifying certain offsite emergency planning elements that would be examined, the NRC stated:

The specific aspects of these [offsite] elements are elaborated on in NUREG-0654 0654/FEMA-REF-1, Rev. 1, (November 1980). The NRC will review only those elements under each of the planning criteria that are essential for determining the licensee's (not State and local agencies') preparedness.

46 Fed. Reg. 61,133 n. 1 (Dec. 15, 1981) (emphasis supplied). However, when the NRC later adopted Section 50.47(d) on July

13, 1982, the foregoing language was deleted. See 47 Fed. Reg. 30,232 (July 13, 1982). Further, when explaining the offsite elements that would need to be reviewed for a low power license, the NRC stated that it would evaluate "the coordination of offsite and onsite emergency preparedness." Id. at 30,234 (emphasis supplied). In stating that coordination of onsite and offsite preparedness would be evaluated, the NRC thus made clear that LILCO's argument that only the onsite plan would be examined is simply incorrect. Rather, the coordination of particular onsite and offsite elements -- particularly the elements in Planning Standards (b)(3), (b)(5), (b)(6), (b)(8), (b)(9), (b)(12), and (b)(15) -- must be evaluated. Thus, where there are misstatements in the LILCO onsite plan which involve offsite elements relevant to the foregoing Planning Standards, as alleged in the County contentions, the misstatements, the alleged lack of coordination, and the alleged regulatory noncompliance must be resolved prior to a decision on LILCO's low power license request.

II. The ASLB's Dismissal Of Phase I Contentions Does Not Bar The County's Motion.

LILCO and the Staff argue that the Board's December 22, 1982 dismissal of Phase I contentions bars the County from filing the instant contentions. It is their view that the Board

intended Phase I to cover all emergency planning issues necessary to be resolved prior to issuance of a low power license and, thus, that the dismissal of Phase I issues in December 1982 necessarily bars the County from raising any issues at this time which are relevant to low power operation. See LILCO Opposition at 6-12; Staff Opposition at 8-13. The Staff and LILCO are incorrect.

The contentions filed by the County are not Phase I issues. Phase I issues were those "matters which were at that time [i.e., the Fall of 1982] capable of final resolution in advance of the then pending preparation of a local offsite plan by Suffolk County." Memorandum and Order Denying Suffolk County's Motion to Terminate the Shoreham Operating License Proceeding, LBP-83-22, at 63 (April 20, 1983).^{6/} The plain fact is that none of the County's contentions was capable of final

^{6/} In LBP-83-22, the Board also stated that the issues to be considered in subsequent emergency planning proceedings would not include any contentions which previously had been admitted in Phase I or "clearly were within the permissible scope of the Phase I emergency planning litigation." (page 64)(emphasis supplied). The County's contentions certainly were not "clearly" within the scope of Phase I since they could not have been resolved in Phase I. See also Prehearing Conference Order, p. 2, July 27, 1982, which also emphasized that Phase I issues were those "currently capable of final resolution" without an offsite plan.

resolution during the Phase I proceeding. Each of these contentions involves a LILCO misstatement regarding offsite emergency preparedness elements referred to in the onsite plan. The misstatement in each instance involves, inter alia, the erroneous LILCO assumption that County personnel, services and/or facilities will be available to support and coordinate with LILCO's emergency response effort. During the Fall of 1982, there was no basis upon which to contest these assumptions because no one knew whether the County would adopt a plan under which coordination with LILCO's onsite plan would be possible. It was not, in fact, until February 17, 1983, with adoption of County Resolution 111-1983, that the County and other parties knew that such County personnel, services and facilities would not be available. Thus, these issues were not capable of final resolution during the Fall of 1982 and therefore were not Phase I issues.^{7/}

The Staff suggests that the County could have "raised" these issues during Phase I even though no County plan existed.

^{7/} The County does not doubt that the previous ASLB did attempt to include in Phase I all issues which it thought would need to be resolved prior to issuance of a low power license. Regardless of that intention, however, what is plain now is that certain issues relevant to low power were not capable of resolution until after February 17, 1983 and thus cannot be termed Phase I issues at all.

Staff Opposition at 13. The Staff further cites Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), CLI-83-19 (July 1, 1983) to assert that the County could have contested in Phase I LILCO's assumption (later proved erroneous) in its onsite plan that County support would be available. Staff Opposition at 15. This argument and citation are inapplicable, however, because the ASLB in this case had strictly limited Phase I to matters which could be finally resolved prior to completion of the County's planning effort.

LILCO also argues that the County cannot raise inadequacies in LILCO's onsite plan at this time because these inadequacies are the result of the County's own action -- namely the County's decision to adopt Resolution 111-1983. This LILCO objection is absurd. Since early 1982, all parties have been on notice that the County was engaged in an intensive effort to decide whether to adopt an offsite plan for Shoreham. Indeed, the Board established a bifurcated Phase I/Phase II proceeding in recognition of the fact that County action relative to its own planning would directly affect the NRC proceeding, but that no one could predict in 1982 what action the County might finally take. Thus, Phase I was to focus on those matters which would not be affected by the County's planning process, with Phase II to address other issues which were not

capable of final resolution prior to completion of the County's planning effort. LILCO now seeks to nullify the Board's Phase I/Phase II delineation by arguing that actions by the County in its planning effort must be ignored by the Board.

Clearly, the Board has recognized from early in this proceeding that the decisions of the County with respect to emergency planning would be of the utmost importance to the NRC proceeding. To agree with LILCO and, thus, to ignore the County's decision not to adopt an emergency response plan for Shoreham would lead to the untenable result that the NRC would pretend that the County was in fact prepared to respond to a Shoreham emergency when the exact opposite is true. LILCO was put on notice on February 17, 1983 that the County would not participate in emergency planning for Shoreham. Yet, well over three months after the County's decision, LILCO filed a revised onsite plan which provided that the County would be available to assist in onsite preparedness for Shoreham. LILCO's revised plan is thus premised on facts which have no basis in reality. The NRC's emergency planning regulations do not permit the parties to ignore reality; the regulations, even those for low power, require preparedness. No required preparedness for Shoreham exists.

A final point needs to be made concerning the Board's Dismissal Order as it relates to the County's contentions. LILCO characterizes the County's Motion as follows:

In fact this is not the usual request to reopen the record. It is rather a request to revoke sanctions imposed on the County for defiance of a Licensing Board order. The County gave up its right to litigate contentions about LILCO's onsite plan by refusing to comply with the Licensing Board's choice of procedure. Accordingly, the issue here is not principally one of the untimeliness of the County's new contentions, but whether it should be allowed to use "changed circumstances" created by itself to evade sanctions that were imposed upon it lawfully and for good reason.

LILCO Opposition at 7. The Staff makes similar arguments. Staff Opposition at 13. These arguments mischaracterize the County's contentions. The County is not seeking to reopen the record; these are, rather, Phase II contentions which have been properly submitted. Further, the County is not seeking to "revoke sanctions" or to "evade sanctions" at all.^{8/} This is a smokescreen by LILCO and the Staff to avoid confronting the plain fact that the onsite plan has repeated factual errors regarding necessary coordination between onsite and offsite preparedness, as alleged in the contentions, and that Phase I was not designed to address those matters.

^{8/} The County continues to believe that the Board's Dismissal Order was in error and will pursue that matter if appeal eventually proves necessary.

III. The County's Contentions Are Timely.

LILCO and the Staff both argue that the County's onsite contentions should have been filed before June 1983 and thus should be dismissed as untimely. See LILCO Opposition at 6, 12-18; Staff Opposition at 14-20. Again, these arguments are in error.

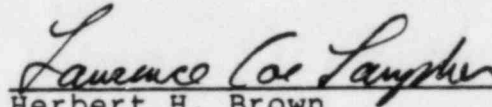
As demonstrated in Part II above and in the Motion, the County's contentions are Phase II issues -- issues which could not have been finally resolved in Phase I -- and thus were timely filed in June 1983 along with other Phase II issues. Furthermore, the County has proceeded diligently to address the impact of County Resolution 111-1983. While the County did not submit these contentions in February 1983, it did immediately ask the Board to terminate the entire proceeding. The Commission did not resolve that issue until May 12, 1983. See Memorandum and Order, CLI-83-13, May 12, 1983. Subsequent to May 13, the County was confronted with the task of preparing contentions on the new LILCO offsite plans (subsequently reduced to one plan) and to reviewing the revised onsite plan to determine whether deficiencies existed. The filing of contentions in June 1983, given the magnitude of paper to be reviewed after May 12, 1983, was entirely reasonable and timely.

IV. Conclusion

For the foregoing reasons, the Motion should be granted and the County contentions set forth in Appendix 1 should be admitted.

Respectfully submitted,

David J. Gilmartin
Patricia A. Dempsey
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11788



Herbert H. Brown
Lawrence Coe Lanpher
Christopher M. McMurray
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

Dated: July 20, 1983

Attorneys for Suffolk County

REVISED SUFFOLK COUNTY CONTENTIONS
REGARDING OFFSITE ELEMENTS OF LILCO'S
ONSITE EMERGENCY PLAN

Contention A. Notification to the Public

Preamble.

Section 50.47(b)(5) requires in part that there be "means to provide early notification and clear instruction to the populace" in the event of a radiological emergency at Shoreham. Such means of notification are essential to alert the public and to keep it informed, if an accident occurs at Shoreham. The system established for notification of the public must have the capability essentially to complete that function within 15 minutes. 10 CFR Part 50, Appendix E, Section IV.D.3. It is the applicant's responsibility to demonstrate that all public notification requirements are met. NUREG 0654, Section II.E.6.

Contention.

LILCO's Revised Onsite Plan states that State and local response organizations will provide emergency notification to the public. (Revised Onsite Plan at 6-12; see also 5-10). However, neither the State nor Suffolk County have agreed to perform this task. Therefore, the notification procedures outlined in the Revised Onsite Plan cannot and will not be implemented. Thus, the Plan does not satisfy 10 CFR Section 50.47(b)(5) or NUREG 0654, Section II.E.6.

Contention B. Notification of and Communications with
State and Local Response Organizations

Preamble.

10 CFR Section 50.47(b)(5) requires the licensee to establish procedures "for notification by the licensee of State and local response organizations." See also NUREG 0654, Section II.E.1. Section 50.47(b)(6) further requires that there exist provisions for prompt communications among principal response organizations. The communications plans must "include organizational titles and alternates for both ends of the communications links." NUREG 0654, Section II.F.1. Such notification and communication are important, both for onsite and offsite preparedness, to alert offsite emergency response authorities in the event of a radiological emergency and to inform them of its progress.

Contention.

Suffolk County contends that LILCO's Revised Onsite Plan offers no assurance that adequate means of notification of and communications with offsite response authorities exist. LILCO's Revised Onsite Plan states that notification of an emergency to the local offsite emergency response authorities will be through the Suffolk County Emergency Operations Center in Yaphank. (Revised Onsite Plan at 7-4; EPIP 1-5 at 6, Attachment 6; see also Revised Onsite Plan at 3-1, 5-10). Moreover, the Revised Onsite Plan provides that communications will be established and maintained with the Suffolk County Department

of Emergency Preparedness which "has the responsibility for the implementation of the County's emergency plans and implementing procedures of the various local agencies involved in the Suffolk County Emergency Plan (Department (sic), Suffolk County Sheriff, Riverhead Town Police, Fire Safety, etc.)." (Revised Onsite Plan at 5-10; see also 3-1).

LILCO's Revised Onsite Plan depends upon County participation to fulfill the requirements of 10 CFR Sections 50.47 (b) (5) and (6) and NUREC 0654, Sections II.E.1 and II.F.1. However, LILCO does not have an agreement with Suffolk County to perform the services which LILCO assumes in its Revised Onsite Plan will be available. In fact, in accordance with Suffolk County Resolutions 456-1982 and 111-1983, no Suffolk County resources or personnel will be available to assure that the offsite notification and communications links required for onsite emergency preparedness at Shoreham will, in fact, exist and be implemented. Therefore, the LILCO Revised Onsite Plan fails to comply with the requirements of 10 CFR Sections 50.47 (b) (5) and (6) and NUREG 0654, Sections II.E.1 and II.F.1.

Contention C. Training

Deleted.

Contention D. Emergency Operations Center

Preamble.

The NRC's emergency planning regulations require that there be "(a)adequate emergency facilities and equipment to support the emergency response." 10 CFR Section 50.47 (b) (8);

see NUREG 0654, Section II.F.1.d. One such required facility is a local emergency response center ("EOC"), which is essential "for use in directing and controlling response functions." NUREG 0654, Section II.H.3. An EOC is necessary for onsite preparedness so that there can be adequate notification of and communications and coordination with offsite authorities, who in turn can alert and inform the public of an accident and its progress.

Contention.

The Revised Onsite Plan designates the basement of the Suffolk County Probation Building in Yaphank as the center for direction and control of the offsite emergency response.

(Revised Onsite Plan at 5-10, 7-4). However, LILCO has no agreement with Suffolk County permitting the use of this County facility for such a purpose and such use is prohibited under Suffolk County Resolution Nos. 111-1983 and 456-1982. Accordingly, the Revised Onsite Plan has no provision for an EOC and thus fails to satisfy 10 CFR Section 50.47(b)(8) and NUREG 0654, Sections II.F.1.d and II.H.3.

Contention E. Notification of and Communications with Emergency Personnel

Preamble.

It is essential to emergency response that there be adequate and reliable communications to and among emergency workers. Therefore, it is required that there be provisions for prompt communications to and among all emergency personnel during a radiological emergency. 10 CFR Section 50.47(b)(6); NUREG 0654, Section II.F.1.

Contention.

The LILCO Revised Onsite Plan assumes that the communications systems of the Suffolk County Police Department, the County Department of Fire Safety and the County Department of Emergency Preparedness will be available to notify and communicate with emergency workers of offsite agencies.

(Revised Onsite Plan at 5-10, 7-4, 7-6, 7-7, 7-9). However, such communications systems will not be available for such use. Thus, the Revised Onsite Plan does not provide for communications with emergency personnel and therefore fails to comply with 10 CFR Section 50.47(b)(6) and NUREG 0654, Section II.F.1.

Contention F. Failure to Identify Offsite Response Organizations

Preamble.

10 CFR Section 50.47(b)(1) requires that the responsibilities for emergency response be assigned to the licensee and State and local organizations. See also NUREG 0654, Section II.A.1.a, b, and c. Section 50.47(b)(3) further requires that "arrangements for requesting and effectively using assistance resources have been made," and that "organizations capable of augmenting the planned response have been identified." See also NUREG 0654, Sections II.C.1.c and II.C.4. Without identification of those entities capable of assisting in an integrated emergency response, there can be no assurance of onsite or offsite emergency preparedness.

Contention.

LILCO's Revised Onsite Plan incorrectly identifies Suffolk County as the local response organization which will implement an offsite plan. (Revised Onsite Plan at 2-2, 5-10). The Revised Onsite Plan at 3-1 also erroneously states that the Director of the Suffolk County Department of Emergency Preparedness has been authorized to function as Emergency Operations Director. Moreover, the Revised Onsite Plan at 7-4 incorrectly identifies the basement of the Suffolk County Probation Building in Yaphank as the local EOC. LILCO has no agreement with Suffolk County to provide emergency resources or facilities in the event of an emergency at Shoreham. Therefore, the organization and facilities that the Revised Onsite Plan identifies to carry out offsite functions are not and will not be available to perform those functions. As a result, the Revised Onsite Plan, as written, fails to identify local emergency organizations with the capability of performing specific emergency response functions as required by 10 CFR Section 50.47(b)(1) and (3), and by NUREG 0654, Sections II.A.1, II.C.1.e, and II.C.4.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)
Unit 1))
_____)

Docket No. 50-322
(Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY RESPONSE TO NRC STAFF AND LILCO OPPOSITIONS TO COUNTY MOTION FOR LEAVE TO FILE CONTENTIONS REGARDING ONSITE EMERGENCY PREPAREDNESS, dated July 20, 1983, have been served to the following this 20th day of July, 1983, by U.S. mail, first class, except as otherwise noted.

- | | |
|---|--|
| (*) James A. Laurenson, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555 | Ralph Shapiro, Esq.
Cammer and Shapiro
9 East 40th Street
New York, New York 10016 |
| (*) Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555 | Howard L. Blau, Esq.
217 Newbridge Road
Hicksville, New York 11801 |
| (#) Dr. M. Stanley Livingston
1005 Calle Largo
Santa Fe, New Mexico 87501 | W. Taylor Reveley, III, Esq. (#)
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212 |
| Edward M. Barrett, Esq.
General Counsel
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501 | Mr. Jay Dunkleberger
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223 |
| Mr. Brian McCaffrey
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801 | Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
Riverhead, New York 11901 |

Nora Bredes
Executive Director
Shoreham Opponents Coalition
195 East Main Street
Smithtown, New York 11787

Marc W. Goldsmith
Energy Research Group, Inc.
400-1 Totten Pond Road
Waltham, Massachusetts 02154

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Joel Blau, Esq.
New York Public Service Comm.
The Governor Nelson A. Rockefeller
Building
Empire State Plaza
Albany, New York 12223

David J. Gilmartin, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

(*) Bernard M. Bordenick, Esq.
David A. Repka, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Stuart Diamond
Environment/Energy Writer
NEWSDAY
Long Island, New York 11747

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Hon. Peter Cohalan
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

Eleanor L. Frucci, Esq.
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Ezra I. Bialik, Esq.
Assistant Attorney General
Environmental Protection Bur.
New York State Dept. of Law
2 World Trade Center
New York, New York 10047

Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Jonathan D. Feinberg, Esq.
Staff Counsel, New York State
Public Service Commission
3 Rockefeller Plaza
Albany, New York 12223

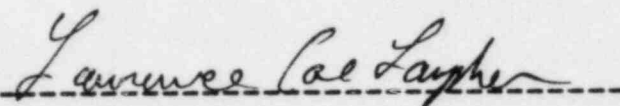
Stewart M. Glass, Esq.
Regional Counsel
Federal Emergency Management
Agency
26 Federal Plaza, Room 1349
New York, New York 10278

James B. Dougherty, Esq.
3045 Porter Street, N.W.
Washington, D.C. 20008

Spence Perry, Esq.
Associate General Counsel
Federal Emergency Management Agency
Washington, D.C. 20472

Mr. Jeff Smith
Shoreham Nuclear Power Station
P.O. Box 618
North Country Road
Wading River, New York 11792

Lucinda Low Swartz, Esq.
Pacific Legal Foundation
1990 M Street, N.W.
Suite 550
Washington, D.C. 20036



Lawrence Coe Lanpher
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

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