

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 O.L.
(Emergency Planning)

SUFFOLK COUNTY RESPONSE TO ASLB REQUEST
FOR PARTIES' VIEWS ON EMERGENCY PLANNING MATTERS

On July 20, 1983, this Board issued its "First Prehearing Conference Order and Notice of Second Prehearing Conference" (the "Order"). Pursuant to the Order, the parties conferred by conference call on August 1, 1983 on proposed schedules and limitations relating to matters such as discovery and summary disposition motions.^{1/} See Order at 3-4. The purpose of this filing is to provide the Board with the County's views regarding the matters raised in the Order. The Town of Southampton, SOC, and NSC join in the views expressed herein by the County.

The County discusses in turn the matters raised by the Board in its Order:

1/ Counsel for the Town of Southampton and NSC were unable to participate in the conference call. However, counsel for Suffolk County discussed the scheduling matters with these other counsel and they concurred in the positions which were stated by the County.

-- Status of Informal Discovery. The parties have vigorously pursued informal discovery since the July 13 prehearing conference. Little informal discovery in the form of interrogatories or document requests should remain to be completed after August 9.

-- Future Discovery. The County intends to conduct deposition discovery commencing as soon as it has received responses to its informal discovery and has had a chance to review those responses with its consultants. The need for depositions is particularly great in this proceeding because the parties are presented with the issues of first impression concerning the ability of a utility to create and in fact implement an entire offsite emergency planning infrastructure. Thus, the County needs to depose LILCO's proposed witnesses, certain of the LERO workers and workers from volunteer organizations, and the Staff/FEMA witnesses and plan reviewers. Only by such discovery will the County and other parties be in a position to address the crucial question whether the plan proposed by LILCO will in fact work.

LILCO desires to limit formal discovery drastically -- perhaps even prohibiting the taking of depositions at all. However, LILCO has provided no reasoned basis for this position except for its obvious desire to proceed as fast as possible.

LILCO did not file its plan until late Spring 1983 and thus it is not surprising that a great deal of work remains to be done in order to understand fully the program which LILCO proposes for compliance with the regulations. If due process is to be preserved, a fair opportunity must be permitted for all parties to pursue their legitimate discovery needs.

-- Scheduling. The County proposes a schedule which includes the following: a brief period to complete and digest informal discovery; an intensive deposition schedule; a period for parties' summary disposition motions; and testimony and hearings to follow Board rulings on summary disposition. This leads to a hearing in early 1984.

-- Other Matters. The parties have agreed that it is premature to address matters such as stipulations of fact, authenticity of documents, etc. It may be prudent, however, for the Board to schedule a conference of counsel after close of discovery where such matters may be discussed. The County does support the requirements that trial briefs be submitted and that cross examination plans be prepared. The parties also agree that the hearing should be on Long Island.

I. Status of Ongoing Informal Discovery

The Board advised the parties to expedite ongoing informal discovery. See Order at 3-4. The County sets forth below the

status of these efforts, which documents that informal discovery has proceeded rapidly.

(a) LILCO Discovery. LILCO has sent the County four sets of interrogatories coupled with document requests, dated June 29 and July 6, 13 and 25.^{2/} A total of 114 interrogatories have been propounded by LILCO to the County as of this date. LILCO also served the County with 33 additional document production requests, dated July 21, 1983. As of August 4, 1983, the County has responded to 109 of the interrogatories and expects to answer the remainder by August 8. The County expects to answer the July 21 LILCO document requests by August 12, 1983.

LILCO also filed on June 29, 1983, interrogatories and document production requests directed to the Town of Southampton and SOC. Additional LILCO requests directed to SOC were filed on August 2, 1983.

(b) County Discovery. The County's informal discovery has been in two phases. First, in June 1983, prior to submission of its draft contentions, the County sent LILCO clarifying questions relating to specific statements, or confusing or

^{2/} The July 25 LILCO interrogatories sought clarification of earlier County responses.

inconsistent cross references, in the LILCO Plan. These clarifying questions required short and relatively simple answers, which were provided promptly by LILCO.

Second, after the July 13 prehearing conference, the County has:

- On July 18, 1983, filed 95 interrogatories/document requests with LILCO. Many of these requested LILCO to identify organizations and individuals with various responsibilities relating to the Plan. As of August 3, 1983, the County had received answers to only one request (that pertaining to tentative trial witnesses) but LILCO has stated that it expects to answer them all by August 9, 1983.
- On July 27, 1983, filed 8 interrogatories and document requests with the Staff. The Staff as of August 4, 1983 has provided data orally concerning identification of witnesses and reviewers of LILCO plan documents. The County awaits responses to the other requests.
- On August 2, 1983, filed 8 additional interrogatories with the Staff, primarily requesting data concerning one identified Staff witness.

(c) Other Discovery. The County is informed that NSC on August 3 propounded discovery requests to LILCO.

II. Future Discovery

Regarding future discovery, it is appropriate to discuss separately interrogatories/document requests and depositions. The County addresses each below.

(a) Interrogatories/Document Requests. LILCO informed the County on August 1 that it would be sending additional interrogatories and/or document requests to the County on or before August 9. The County does not intend to pursue further interrogatory or document request discovery except for "follow-up" discovery based on LILCO or Staff responses to the County's already outstanding requests. Further, there may be need for County discovery on Revision 1 to the LILCO Plan, which the parties just received this week. The County has not yet had an opportunity to review Revision 1 in any detail. ^{3/}

(b) Depositions. An impasse exists between LILCO and the County regarding the use of depositions. LILCO has informed the County that it believes there should be few depositions or perhaps none at all. During the conference call on August 1,

^{3/} Similarly, if there are further revisions to LILCO's Plan, there may be a need for further discovery related to those revisions.

LILCO declined to indicate whether it planned to seek any depositions because it apparently had not decided that issue.

The County believes strongly that there must be a reasonable opportunity to depose essential persons. The reasons are set forth below:

(i) First, the LILCO Plan represents an unprecedented endeavor by which the utility is attempting to demonstrate regulatory compliance and hence adequate preparedness despite the decision by the County not to adopt or implement any plan. The County does not believe LILCO can demonstrate regulatory compliance. The Board has ruled, however, that LILCO must have the "opportunity" to attempt to show that it satisfies 10 C.F.R. § 50.47. This ruling led to LILCO's May 1983 submission of the Transition Plan under which LILCO attempts to create an entire offsite emergency response infrastructure which must be trained and prepared to respond to a serious accident. To say that this Plan presents unprecedented issues of first impression, particularly related to the company's capability to implement this plan, is an understatement. The issues are numerous, as reflected in the Revised Contentions. Further, the Plan itself merely asserts that certain things will be done. It is the County's position, as reflected in the Contentions, that regardless of what is written on paper, the Plan

cannot and will not be implemented in a manner which satisfies mandatory legal requirements. To prove this point, and thus to test whether LILCO is in fact capable of implementing adequate protective actions in the event of a Shoreham emergency. the LILCO plan must be carefully analyzed and its bases fully understood. This requires a discovery process geared to gaining the necessary data.

(ii) Second, depositions are the best means to obtain the necessary data. Interrogatories are cumbersome and do not permit necessary follow up. They are useful mainly to identify certain objective facts and persons and organizations relied upon for the emergency response effort but are not well suited to understanding the bases for a witness' position or for assessing whether LILCO in fact is capable of implementing essential portions of the plan. Similarly, while document requests certainly may produce important data, the documents then must be understood, a process for which depositions are uniquely suited. In short, while informal discovery has been pursued actively (and hopefully will yield useful data when LILCO's responses are received), there remain a great deal of data to be developed via depositions before the parties can present their cases to the Board regarding the adequacy of LILCO's plan.^{4/}

^{4/} LILCO suggests that little additional discovery needs to be pursued because parties have had a chance already to

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The County has heard several arguments from LILCO as to why there should be few or no depositions. First, LILCO stated on July 13 that its experience with depositions last summer on Phase I emergency planning leads it to think that depositions will not be very valuable. See Tr. 81. The County disagrees. The prior depositions were very important to an understanding of the parties' positions. Further, the depositions taken on other aspects of the case (such as the diesel generator depositions which are ongoing) have been extremely valuable as means of focussing the issues. In short, there is no reason to believe that the depositions proposed by the County would do anything but assist in the focussing of issues to be litigated.

Second, LILCO has suggested that not many depositions would be necessary because some of the discovery during Phase I addressed Phase II issues as well. See Tr. 79-80. However, as LILCO itself noted on July 13 (Tr. 79), the LILCO plan did not even exist last summer and thus the so-called Phase II

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pursue informal document discovery. See Tr. 80. However, as noted above, there are clear limitations on the usefulness of such discovery. The parties have been active in pursuit of available informal discovery, this cannot substitute for the deposition discovery which now is essential.

discovery was not focussed on the issues which are now before the Board.^{5/}

Finally, LILCO has suggested that it is the "plan" which is being litigated and thus this is more a "document" case, rather than a "deposition" case. Tr. 81. The Plan of course is an important part of this case but the plan is only paper. The question which is crucial is whether the plan works -- whether it can in fact be implemented by LILCO and whether, if implemented, it will provide protection. That is not something that can be discerned via review of papers. Rather, that inquiry involves an all-important human element which can only be pursued via depositions.

In short, LILCO has presented no good reason why depositions should not be used. Indeed, given the issues of first impression presented in this case and the clear limitations on the usefulness of interrogatories, this case presents a particularly compelling need for depositions. We address below those depositions which the County intends to pursue.

^{5/} LILCO also suggests that little discovery needs to be taken because the parties have been dealing with emergency planning for more than a year. See Tr. 80. However, the ongoing efforts prior to May 1983 did not deal at all with LILCO's new plan. Thus, the County cannot discern how its prior efforts can even arguably be asserted to be a basis for depriving the County of discovery on LILCO's new plan.

In anticipation of the need for depositions, the parties, at the County's suggestion, exchanged tentative witness lists prior to August 1. The County made this suggestion so that proposed deposition schedules could be discussed and the results could be conveyed to the Board. The tentative witness lists, as of August 1, 1983, are attached as Appendix A hereto. The County had identified 18 potential witnesses as of July 22, 1983; LILCO had identified 23 as of July 29, 1983;^{6/} and the Staff had identified 6 witnesses (including FEMA witnesses) as of August 1, 1983.^{7/}

In terms of reaching any consensus on depositions, the August 1 conference was not fruitful. The County spent considerable time prior to August 1 reviewing the tentative witness lists to assess which persons it wanted to depose and how long each deposition might last. LILCO clearly had not done this. LILCO merely expressed the view that discovery should be "limited" but it was not prepared to identify even whether it

^{6/} By letter of August 2, 1983, LILCO identified an additional witness related to public education and information, who had been inadvertently omitted from LILCO's earlier list.

^{7/} On August 2, Staff counsel informed the County that it appeared more likely that there would be five Staff/FEMA witnesses.

intended to take any depositions. The Staff indicated that it intended to pursue no discovery.

The County accordingly reports below only the depositions which the County and other intervenors intend to take. The depositions are divided into three groups: persons listed by LILCO as prospective witnesses; persons listed by the Staff as prospective witnesses; and an allowance for depositions of individuals not yet identified. The time estimates, of course, are very tentative and to a large degree are based upon the number of different subjects which have been identified to be addressed by the prospective witness. Until the County has received and reviewed the answers to its outstanding discovery requests, it will not be possible for the County to be more definite in this listing.

LILCO witnesses. The County tentatively plans to depose 22 of LILCO's 24 identified witnesses as set forth below.

<u>Witness</u>	<u>Subject Area of Responsibility Identified by LILCO</u>	<u>Estimated # of Days</u>
Michael L. Miele	Protective action recommendation, radiological equipment, ingestion pathway, health effects of radiation	1
Edward B. Lieberman	Evacuability study, evacuation time estimates, traffic, evacuation shadow, driver behavior	2-3

Dennis E. Miletì	Role strain, evacuation shadow, social and psychological issues, surveys, credibility, public education, public information, driver behavior, command and control	1-2
Russell R. Dynes	Role strain, evacuation shadow, social and psychological issues, surveys, credibility, public education, public information, driver behavior, command and control	1-2
John A. Weismantle	Command and control, role strain, protective action implementation, training, recovery, staffing	1
Charles A. Daverio	Command and control, role strain, protective action implementation, training, recovery	1
Anthony M. Callendrello	Protective action implementation	1
Elaine D. Robinson	Non-LILCO support groups	1-2
Carol A. Clawson	Public information, public education	1
William G. Shiffmacher	Communications, offsite power	1-2
Ronald A. Varley	Training, drills and exercises	1-2
Gary J. Burger	Training, drills and exercises	1-2
Thomas E. Potter	Radiological consequence analysis	1-2

Saul D. Levine	EPZ criteria	1
Brant Aidikoff	Protective actions	1/2
G. Hoyt Whipple	Health effects of radiation	1
Leonard Hamilton	Health effects of radiation	1
William F. Renz	Communications, offsite power	1-2
Michael C. Cordaro	Radiological equipment, ingestion pathway, health effects of radiation, traffic, role strain, command and control, training drills, exercises, recovery, staffing, non-LILCO support groups, probabilistic analysis, radiological consequence analysis, EPZ criteria, protective actions	1
William G. Johnson	Surveys	1-3
David N. Richardson	Surveys	1-3
Darrell M. Lankford	Public education and information	1-2

Staff/FEMA Witnesses. The County intends to depose each of the Staff/FEMA witnesses:

<u>Witness</u>	<u>Subject Area of Responsibility Identified by Staff</u>	<u>Estimated # of Days</u>
John Sears (Staff)	Onsite Issues and interface with offsite	1/2-1
Thomas Urbanic (Staff consultant)	Evacuation time estimates	1-2
Roger B. Kowieski (FEMA)	?	1

Fred Sharrocks (FEMA)	?	1
Unidentified Argonne Employee ^{8/}	?	1-2

Other. The County has still received virtually no responses to its outstanding informal discovery requests. When those responses are received and reviewed, the County estimates that additional individuals from LILCO (for example, the persons responsible for selecting LERO workers or for determining shielding factors or perhaps several LERO workers and/or workers from other organizations (like BNL or ARC)) would be deposed. For purposes of these estimates, the County believes that approximately five additional depositions will be required, each lasting about one day.

The total number of deposition days (assuming the lower time estimates in each instance)^{9/} is 32 days.

^{8/} FEMA has indicated that 6-8 persons were involved in the Argonne review of the LILCO plan. The Staff apparently intends to use only one Argonne person as a witness. The County may wish, however, to depose several of the Argonne people, depending upon the responsibilities of the persons involved.

^{9/} It is hoped that some depositions might be obviated or shortened if it becomes clear that there is a knowledgeable person on a matter and thus that certain persons do not need to be deposed. Thus, the County believes the 32 day estimate is realistic.

III. Future Schedule

As directed by the Board, the parties have discussed the schedule for future proceedings. The periods for discovery and for subsequent proceedings are addressed separately below.

(a) Discovery Schedule. The LILCO proposed discovery schedule, as explained during the August 1 conference call, would last 4 1/2 weeks and would involve: (a) an interim deadline, somewhere during the 4-1/2 week discovery period, for the sending out of all document discovery requests; (b) the requirement that all discovery responses, and document production, be completed by the end of the 4-1/2 week period; and (c) the completion of all depositions (if any are held) by the end of the 4-1/2 week period (i.e., prior to or during document production). LILCO's counsel indicated that "massive" depositions should not be undertaken and that discovery should proceed "at a brisk pace." LILCO counsel expressed the view that depositions should be "limited" either by being barred altogether, or by the imposition of an arbitrary limit on the number permitted (e.g., each party could take only 4 depositions). As noted earlier, counsel for LILCO declined to state whether LILCO planned to take any depositions of any witnesses.

During the conference call, the County presented a specific discovery schedule proposal, based upon the status of

ongoing informal discovery and its review of the tentative witness lists provided by LILCO and the Staff. The County's discovery schedule was based upon the following assumptions: that responses to the County's outstanding discovery requests would be provided on or shortly before August 9; that these responses would necessitate only a limited amount of "follow-up" discovery; that the responses would identify some individuals (in addition to the persons identified by LILCO as potential witnesses) whom the County would want to depose (e.g., the American Red Cross representative with whom LILCO has worked; the Brookhaven National Laboratory representative to be responsible for offsite dose assessment; a representative of the bus company upon whom the LILCO Plan relies); and that Revision 1 to the LILCO Plan, received by the County on August 1, might give rise to the need for some additional discovery or clarifying questions. The County's proposal as made to the other parties was as follows:

1. All "document" discovery to end, and depositions to begin, on August 29, 1983. The 20 days between August 9 and August 29 would be used: to complete any necessary "follow-up" or Revision 1 discovery; to review and transmit to technical consultants for their review and comment, the results of, and documents produced during, informal discovery; and to begin preparation for depositions.

2. Depositions to be taken up to five days per week beginning August 29, with the completion date depending upon the number of depositions each party desired to take. Assuming no other party desired to take depositions, the formal discovery period proposed by the County would total about 73 days -- i.e., from August 10 through October 21. ^{10/} This is less than the 90 days initially suggested by the County at the July 13 prehearing conference (Tr. 78), but it takes into account both the informal discovery that will have taken place by August 9 and the County's best estimate of its deposition needs, based on the information currently available.

LILCO counsel was asked by County counsel on August 1 how LILCO proposed to reconcile its 4-1/2 week discovery period with the County's expressed desire to take depositions. LILCO's counsel responded that it might take the position that the County should be prohibited from taking all or some of the

^{10/} The schedule discussed during the August 1 conference call lasted 69 days. The County has adjusted this schedule to 73 days in view of LILCO's addition of another witness and for other factors discussed below. The 75-day schedule assumes a total of 32 days of depositions conducted on business days and an allowance of several business days spread over the deposition period for travel of consultants and attorneys and for preparation time. It also takes into account that there are several special days within that period: Labor Day, September 5; Rosh Hashana, September 8; and Columbus Day, October 10.

depositions it has determined are necessary or that the County should be required to take more than one deposition simultaneously. The County opposes both suggestions should they be made in LILCO's filing today. The proposal to limit drastically the number of depositions which the County may take (and thus probably to preclude the County from deposing some of the very witnesses LILCO intends to present) would be arbitrary and unjustified. As documented already, there is a need for deposition discovery in this case.

The proposal that more than one deposition be taken simultaneously is similarly unreasonable. The County's emergency planning consultants who will assist counsel during depositions are frequently involved in more than one issue (as are many of LILCO's proposed witnesses), and cannot be in two or more places at the same time. Neither can the County's attorneys who will be preparing for and taking the depositions.^{11/} The deposition schedule proposed by the County is already quite grueling -- it assumes depositions will be conducted on all but a few business days over a period of seven consecutive weeks.^{12/} An additional requirement that more than one

^{11/} The other Intervenor (Southampton, SOC and NSC) would be even more prejudiced by a requirement of simultaneous depositions because they have only one lawyer representing them, and they would thus literally be prohibited from participating in an entire set of depositions.

^{12/} The underlying assumptions of this schedule are obvious: that the very few extra days, and weekends, will be neces-

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deposition be conducted simultaneously would impose an unnecessary and unreasonable burden on all the parties and their consultants.

A final point on discovery needs to be made. In its July 20 Order, the Board stated that "upon completion of the process of admitting contentions, only a very limited period of discovery would be allowed." Order at 3. The County does not know the basis for the Board's tentative view. The parties have proceeded diligently on informal discovery. Notwithstanding the progress to date, the County reiterates its view that there is deposition discovery which is essential to the County's preparation of its case. Given the number of witnesses which LILCO and the Staff have proposed to use, it is essential for the County to know in advance the basic positions which will be taken. Those depositions are necessary in order: (a) to understand how LILCO and the Staff interpret or intend to use the Plan and/or documents which will be produced by LILCO and the Staff; and (b) to learn how and on what basis LILCO and the Staff intend to oppose the contentions submitted by the Intervenor.

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sary for travel, and that the need for preparation time will require that several lawyers be involved in taking the depositions.

The LILCO proposal of 4-1/2 weeks for discovery is not based on any facts, any parties' actual discovery needs, or any rational theory insofar as the County can determine. In the County's view, its only basis is LILCO's desire to obtain a Board ruling as soon as possible. As was explained during the July 13 prehearing conference, the subject of this litigation is a plan that is unprecedented, and under which LILCO not only purports to create an organization and the necessary infrastructure capable to duplicate a functioning local government, but also purports to be able to implement a wide array of actions and protective actions using that organization. The suggestion that the Intervenor should be able to prepare testimony and to litigate the adequacy and implementability of this Plan, based on a 4-1/2 week discovery period during which documents and other informal request responses are reviewed, additional document production takes place, and either an arbitrary number of depositions, or none at all is taken, is without any basis and is on its face unrealistic. Accordingly, whatever discovery period finally is established, it must be sufficient to permit the depositions which the County has tentatively decided to take.

(b) Post-Discovery Schedule. LILCO has proposed a 3-1/2 week period after close of discovery for simultaneous

preparation of summary disposition motions and testimony. The County schedule is somewhat different:

- Summary disposition motions to be filed two weeks after the close of discovery. Responses to be filed pursuant to 10 CFR § 2.749(a).
- Testimony to be filed two weeks after rulings on summary disposition motions.
- Hearings to begin approximately two weeks after filing of testimony.

These schedules do not differ too substantially, other than LILCO's suggestion for the simultaneous submission of summary disposition motions and testimony, and the County's view that the separate submission of testimony, following rulings on summary disposition motions, would be more efficient.^{13/}

LILCO's proposal that summary disposition motions or testimony be filed 3-1/2 weeks after the close of discovery contemplates the parties' conferring before hand and agreeing on which contentions would be subject to motions, so the parties could

^{13/} See Tr. 90-91 where County counsel expressed the view that testimony and summary disposition motions do not necessarily address the same matters since testimony will often be of a panel and address several issues, while summary disposition pleadings necessarily only address the matters which are the subject of the motion.

prepare either affidavits or testimony on a given contention. LILCO apparently contemplates the submission of testimony following rulings denying summary disposition motions.

The County agrees that a conference of the parties following the close of discovery would be a useful means of ensuring that the parties are aware of each others' intentions regarding summary disposition motions and of eliminating the potential for preparing testimony that may never have to be filed. However, in the County's view, using the time following submission of summary disposition motions to prepare testimony on issues not subject to such motions, will result in better and more focussed testimony that will produce a more efficient hearing, than would a requirement that all testimony be written and submitted at the same time that summary disposition motions are prepared and submitted.

The County's proposal of two weeks after the close of discovery for submission of summary disposition motions would have such motions submitted on November 4 (assuming only the County were taking depositions under the County's proposed schedule). Assuming the Board were to rule on the motions within 10 days of the receipt of responses (responses due on November 25 (10 C.F.R. § 2.749(a)); Board rulings by December 5), under the County's proposed schedule testimony would be submitted on the

remaining issues by December 19. Hearings could begin on January 2 or 9, 1984.

IV. Other Matters

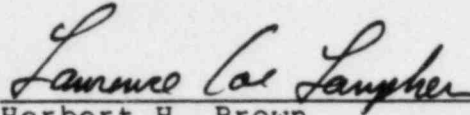
In response to the Board's suggestion that other items in the July 13 conference agenda be addressed in this filing, the County notes its belief, in which the other parties concurred during the August 1 conference, that it is premature to discuss the matters of exhibits, stipulations, admissions, authenticity of documents, prehearing motions (other than for summary disposition), the order of hearing issues, and the estimated length of the hearing. A further conference of counsel regarding these matters might be appropriate after the close of discovery. The County notes that it favors the submission of trial briefs and cross examination plans as a useful means to focus the issues. ^{14/} Motions to strike testimony, and responses thereto, should be filed shortly before the hearing on such testimony.

^{14/} Trial briefs should be due 10 days after the filing of testimony; cross examination plans on a given issue should be filed a day or two before the commencement of cross examination on that issue.

The lead intervenors on specific contentions were identified in the Memorandum which accompanied the Revised Contentions filed on July 26, 1983. The parties agreed that the hearing should be held on Long Island.

Respectfully submitted,

David J. Gilmartin
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Hauppauge, New York 11788

A handwritten signature in cursive script, reading "Lawrence Coe Lanpher", written over a horizontal line.

Herbert H. Brown
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Attorneys for Suffolk County

August 4, 1983

APPENDIX A

NOTE: No listing of Staff/FEMA witnesses is attached. Such listing has only been conveyed orally.

Response to Suffolk County
Informal Discovery Requests of July 18, 1983

Suffolk County Request 1:

Identify each person whom LILCO expects to call as an expert or non-expert witness during the emergency planning hearings and state the subject matter on which each is expected to testify.

Response:

Michael L. Miele: Protective action recommendation, radiological equipment, ingestion pathway, health effects of radiation.

Edward B. Lieberman: Evacuability study, evacuation time estimates, traffic, evacuation shadow, driver behavior.

Dennis E. Milet: Role strain, evacuation shadow, social and psychological issues, surveys, credibility, public education, public information, driver behavior, command and control.

Russell R. Dvnes: Role strain, evacuation shadow, social and psychological issues, surveys, credibility, public education, public information, driver behavior, command and control.

John A. Weismantle: Command and control, role strain, protective action implementation, training, recovery, staffing.

Charles A. Daverio: Command and control, role strain, protective action implementation, training, recovery.

Anthony M. Callendrello: Protective action implementation.

Elaine D. Robinson: Non-LILCO support groups.

Carol A. Clawson: Public information, public education.

William G. Schiffmacher: Communications, offsite power.

Ronald A. Varley: Training, drills and exercises.

Gary J. Burger: Training, drills and exercises.

Edward T. Burns: Probabilistic analysis.

Vojin Joksimovich: Probabilistic analysis.

Thomas E. Potter: Radiological consequence analysis.

Saul D. Levine: EPZ criteria.

Brant Aidikoff: Protective actions.

G. Hoyt Whipple: Health effects of radiation.

Leonard Hamilton: Health effects of radiation.

William F. Renz: Communications, offsite power.

Matthew C. Cordaro: Radiological equipment, ingestion pathway, health effects of radiation, traffic, role strain, command and control, training, drills, exercises, recovery, staffing, non-LILCO support groups, probabilistic analysis, radiological consequence analysis, EPZ criteria, protective actions.

William G. Johnson: Surveys.

David N. Richardson: Surveys.

Darrell M. Lankford: Public education, public information.

SUFFOLK COUNTY TENTATIVE WITNESS LIST

1. Response

Fred Finlayson: EPZ, consequence analyses, dose projection,
dose assessment.

Philip B. Herr: emergency planning, traffic, evacuation
time estimates.

Kai Erikson: role conflict, evacuation shadow, social and
psychological issues, surveys, public education,
credibility.

James H. Johnson: evacuation shadow, public education,
role conflict, social and psychological issues, traffic,
surveys, credibility.

Donald J. Zeigler: evacuation shadow, public education,
role conflict, social and psychological issues, traffic,
surveys, credibility.

Susan Saegert: evacuation shadow, public education, social,
role conflict and psychological issues, surveys,
credibility, command and control, driver behavior.

Edward P. Radford: health effects of radiation.

Stephen Cole: surveys.

Inspector Richard C. Roberts, SCPD: command and control,
traffic, security, mobilization.

Inspector Joseph J. Monteith, SCPD: command and control,
traffic, security, mobilization.

Deputy Inspector Michael Turano, SCPD: command and control,
traffic, security, mobilization.

Captain Ed Michaels, SCPD: traffic, command and control.

Captain Peter Cosgrove, SCPD: training.

Lt. John Fackler, SCPD: training.

Captain Snow, SCPD: communications.

Deputy Inspector Regensberg, SCPD: communications.

Officer Vincent Stiles, SCPD: communications.

Deputy Inspector Philip McGuire, SCPD: traffic, security,
command and control, mobilization.

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 ASLB REQUEST FOR PARTIES' VIEWS ON EMERGENCY PLANNING MATTERS, dated August 4, 1983, have been served to the following this 4th day of August, 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
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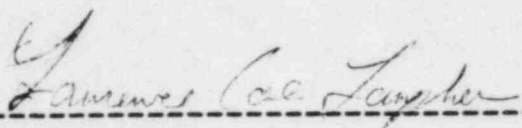
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DATED: August 4, 1983

(*) 8/4/83 By Hand Delivery
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