

LILCO, September 19, 1983

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
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Before the Atomic Safety and Licensing Board

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY) Docket No. 50-322-OL-03
) (Emergency Planning Proceeding)
(Shoreham Nuclear Power Station,)
Unit 1))

LILCO INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO SUFFOLK COUNTY (SECOND SET)

As used in these interrogatories and requests for production, the term "Suffolk County" means Suffolk County, and any 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 Suffolk County, or at Suffolk County's direction and control, or in concert with Suffolk County or assisting Suffolk County.

Suffolk County is requested by LILCO, pursuant to 10 C.F.R. § 2.740b, to answer each of the following interrogatories within fourteen (14) days after service hereof, using the same instructions for answering interrogatories as are set forth on pages 1 through 11 of "Suffolk County Interrogatories to Long Island Lighting Company," dated August 19, 1983. To the extent that the following interrogatories request

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production of documents, responses to them are requested on the same schedule as answers to interrogatories due to the closeness of impending depositions and the fact that the need for these interrogatories did not become apparent until after September 14, 1983.

5. With respect to Dr. Bruce Pigozzi:

- a. Please state whether Dr. Pigozzi has prepared, or has had prepared, any written studies, reports, analyses or other documents for Suffolk County with respect to any of the following: (1) the proposition that "LILCO time estimates are inaccurate, unreliable and, in fact, should be far longer" (see Answer to LILCO Request 52(c) dated August 8, 1983); (2) traffic; (3) evacuation times.
- b. Unless the answer to part a. is a simple negative, please identify each such document without regard to whether Suffolk County intends to assert a claim of privilege with respect to it, including date, title and addressee, if any.
- c. Please provide a copy of each such document identified in part b. which can reasonably be copied and which has not already been provided to LILCO; LILCO agrees in advance to pay reasonable copying costs. For any document as to which Suffolk County asserts that

copying is not feasible, please identify the location at which it may be inspected by LILCO.

- d. Please describe any work already completed, or in progress, or now known to be conducted in the future in connection with this proceeding, by Dr. Pigozzi or under his supervision and direction and not already described in part b. hereof, and relating to any of the following: (1) LILCO's evacuation plan, including, but not limited to, traffic time estimates; (2) estimation of time and other relevant aspects of evacuation of a 10-mile EPZ; (3) the PRC Voorhees evacuation time estimates and analysis for a 20-mile EPZ; (4) traffic; (5) evacuation times.
- e. Please provide a copy of Dr. Pigozzi's most current curriculum vitae or statement of professional qualifications.
- f. Please list any NRC or other legal proceedings in which Dr. Pigozzi has testified on matters relating to traffic, evacuation time estimates, or emergency planning, state the subject matter of his testimony, and its approximate date.
- g. Please provide copies of any prefiled testimony by Dr. Pigozzi in the proceedings listed in the response to item f.

- h. Please identify all articles, papers or other documents authored or co-authored by Dr. Pigozzi or the subjects of traffic, evacuation times, emergency planning or the Shoreham power plant which have been published in the open literature.
 - i. Please also identify all such articles, papers and other documents not published in the open literature but circulated within the professional community.
- 6. With respect to Dr. David M. Harris:
 - a. Please state whether Dr. Harris has prepared, or has had prepared, any written reports, studies, analyses or other documents for Suffolk County with respect to any of the following: (1) the proposition that "the time necessary, following mobilization, to accomplish the proposed evacuation of special facilities will be too long to provide adequate protection from health-threatening radiation doses" (SC Revised Contention 72.A); (2) the proposition that "the LILCO Plan cannot be implemented in a timely manner and therefore will not provide adequate protection to handicapped persons in the EPZ" (SC Revised Contention 73); (3) evacuation of persons with special needs and related services; (4) relocation centers.

- b. Unless the answer to part a. is a simple negative, please identify each such document without regard to whether Suffolk County intends to assert a claim of privilege with respect to it, including date, title and addressee, if any.
- c. Please provide a copy of each such document identified in part b. which can reasonably be copied and has not already been provided to LILCO; LILCO agrees in advance to pay reasonable copying costs. For any document as to which Suffolk County asserts that copying is not feasible, please identify the location at which it can be inspected by LILCO.
- d. Please describe any work already completed, or in progress, or now known to be conducted in the future in connection with this proceeding, by Dr. Harris or under his supervision and direction and not already described in part b hereof, and relating to any of the following: (1) the time necessary, following mobilization, to accomplish evacuation of hospitals, nursing homes, and other special facilities; (2) the relationship between the timeliness of evacuation plan implementation and provision of protection to handicapped persons or of persons in hospitals, nursing homes and other special facilities; (3) LILCO's provisions for evacuation of hospitals,

nursing homes and other special facilities; (4) evacuation of persons with special needs and related services; (5) relocation centers.

- e. Please identify each person who conducted interviews or otherwise collected information for a report entitled "Comments on the LILCO Emergency Plan for Shoreham," presented by Dr. Harris to the Cuomo Commission on September 14, 1983.
- f. Please provide copies of each set of interview notes or other documents compiled by the persons who conducted interviews in the process of preparation of the report referred to in paragraph e.
- g. Please provide copies of Dr. Harris' most current curriculum vitae or statement of professional qualifications.
- h. Please list any NRC or other legal proceedings in which Dr. Harris has testified on matters within the scope of the expected subject matter of his testimony in this proceeding, state the subject matter of his testimony, and its approximate date.
- i. Please provide copies of any prefiled testimony by Dr. Harris in the proceedings listed in the response to item h.

- j. Please identify all articles, papers or other documents authored or co-authored by Dr. Harris on matters relating to medical or public health aspects of emergency planning or evacuation, which have been published in the open literature.
 - k. Please also identify all such articles, papers and other documents not published in the open literature but circulated within the professional community.
7. With respect to Commissioner Donald Dilworth:
- a. Please state whether Commissioner Dilworth has prepared any written studies, reports, analyses or other documents for Suffolk County with respect to any of the following: (1) command and control; (2) emergency planning; (3) role conflict; (4) traffic; (5) mobilization.
 - b. Unless the answer to part a. is a simple negative, please identify each such document without regard to whether Suffolk County intends to assert a claim of privilege with respect to it, including date, title and addressee, if any.
 - c. Please provide a copy of each such document identified in part b. which can reasonably be copied and has not been already provided to LILCO; LILCO agrees in

advance to pay reasonable copying costs. For any document as to which Suffolk County asserts that copying is not feasible, please identify the location at which it may be inspected by LILCO.

- d. Please describe any work already completed, or in progress, or now known to be conducted in the future in connection with this proceeding, by Commissioner Dilworth or under his supervision and direction and not already described in part b. hereof, and relating to any of the following: (1) LILCO's evacuation plan, including, but not limited to, traffic time estimates; (2) estimation of time and other relevant aspects of evacuation of a 10-mile EPZ; (3) the PRC Voorhees evacuation time estimates and analysis for a 20-mile EPZ; (4) command and control; (5) emergency planning; (6) role conflict; (7) mobilization.
- e. Please provide a copy of Commissioner Dilworth's most current curriculum vitae or statement of professional qualifications.
- f. Please list any NRC or other legal proceedings in which Commissioner Dilworth has testified on matters within his professional expertise and relevant to emergency planning, state the subject matter of his testimony, and its approximate date.

- g. Please provide copies of any prefiled testimony by Commissioner Dilworth not already provided to LILCO in the proceedings listed in the response to item f.
- h. Please identify all articles, papers or other documents and authored or co-authored by Commissioner Dilworth which have been published in the open literature on any of the following: (1) LILCO's evacuation plan, including, but not limited to, traffic time estimates; (2) estimation of time and other relevant aspects of evacuation of a 10-mile EPZ; (3) the PRC Voorhees evacuation time estimates and analysis of a 20-mile EPZ; (4) mobilization.
- i. Please also identify all such articles, papers and other documents not published in the open literature but circulated within the professional community on any of the following: (1) LILCO's evacuation plan, including, but not limited to, traffic time estimates; (2) estimation of time and other relevant aspects of evacuation of a 10-mile EPZ; (3) the PRC Voorhees evacuation time estimates and analysis of a 20-mile EPZ; (4) mobilization.

8. With respect to Mr. Gregory Minor:

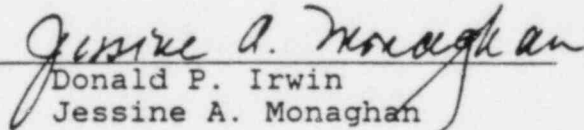
- a. Please state whether Dr. Minor has prepared any written studies, reports, analyses or other documents for Suffolk County with respect to any of the following: (1) sheltering; (2) radiological monitoring; (3) consequence analysis.
- b. Unless the answer to part a. is a simple negative, please identify each such document without regard to whether Suffolk County intends to assert a claim of privilege with respect to it, including date, title and addressee, if any.
- c. Please provide a copy of each such document identified in part b. which can reasonably be copied and has not been already provided to LILCO; LILCO agrees in advance to pay reasonable copying costs. For any document as to which Suffolk County asserts that copying is not feasible, please identify the location at which it may be inspected by LILCO.
- d. Please describe any work already completed, or in progress, or now known to be conducted in the future in connection with this proceeding, by Mr. Minor or under his supervision and direction and not already described in part b. hereof, and relating to any of the following: (1) sheltering; (2) radiological monitoring; (3) consequence analysis.

- e. Please provide a copy of Mr. Minor's most current curriculum vitae or statement of professional qualifications.
- f. Please list any NRC or other legal proceedings in which Mr. Minor has testified on any of the following: (1) sheltering; (2) radiological monitoring; or (3) consequence analyses; and state the subject matter of such testimony, and the approximate date.
- g. Please provide copies of any prefiled testimony by Mr. Minor in the proceedings listed in the response to item f.
- h. Please identify all articles, papers or other documents authored or co-authored by Mr. Minor which have been published in the open literature on any of the following: (1) sheltering; (2) radiological monitoring; (3) consequence analyses.
- i. Please identify all articles, papers and other documents authored or co-authored by Mr. Minor and not published in the open literature but circulated within the professional community on any of the following: (1) sheltering; (2) radiological monitoring; (3) consequence analyses.

9. Please identify any persons who have contacted the national headquarters of the American Red Cross on behalf of Suffolk County with respect to emergency planning at Shoreham since July 1, 1983. Please also state the date of any such visit, its purpose, the subject-matter area discussed and the name or names of persons met with. Please also identify any documents provided to, or received from the Red Cross, regardless of whether a claim of privilege is intended to be asserted with respect to such document or documents.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY


Donald P. Irwin
Jessine A. Monaghan

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

DATED: September 19, 1983

LILCO, September 19, 1983

CERTIFICATE OF SERVICE

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322-OL-3

I, Jessine A. Monaghan, hereby certify that a copy of LILCO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO SUFFOLK COUNTY (SECOND SET) was served this date upon the following by first-class mail, postage prepaid, or by hand (as indicated by an asterisk), or by Federal Express (as indicated by two asterisks).

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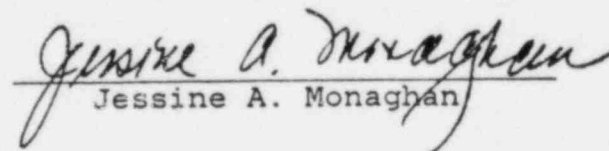
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DATED: September 19, 1983