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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power Station,  
Unit 1) )

Docket No. 50-322-OL-3

(Emergency Planning)

SUPPLEMENTAL DIRECT TESTIMONY  
OF NICK J. MUTO AND J.  
THOMAS SMITH ON BEHALF OF  
THE MIDDLE ISLAND CENTRAL  
SCHOOL DISTRICT AND SUFFOLK  
COUNTY REGARDING CONTENTION  
25 - ROLE CONFLICT

Q. Please state your names and positions.

A. My name is Nick J. Muto. I am the Superintendent of the  
Middle Island Central School District.

My name is J. Thomas Smith. I am the Transportation  
Coordinator of the Middle Island Central School District.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to supplement our  
previous testimony regarding Contention 25, dated November 18,  
1983, in order to address changes made to the LILCO Plan in Re-  
vision 3.

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Q. Have you reviewed Revision 3 to the LILCO Plan?

A. We have reviewed pages II-10 to 10a, II-19 to 21, and IV-169 to 171 of Appendix A. These are the portions of the LILCO Plan, as modified by Revision 3, that pertain to protective actions for schools. Revision 3 provides that school districts such as Middle Island, having school buildings inside the 10-mile EPZ, will now be advised to institute an early dismissal only if LILCO does not recommend protective actions to the general public in the EPZ. If the general public is advised to shelter, the schools are expected to shelter their students in their school buildings. If any portion of the general public is advised to evacuate, the schools are expected to relocate their students to unspecified relocation centers outside the 10-mile EPZ.

Q. Does Revision 3 reduce the adverse effects of role conflict on the implementability of protective actions for schools that you discussed in your November 18 testimony?

A. No. It is our considered opinion that Revision 3 still offers no adequate protection to school children in the event of a disaster at the Shoreham Nuclear Plant. If anything, problems related to role conflict would probably be worse if schools were to attempt to implement the provisions of Revision

3. Consequently, the proposals contained in Revision 3 are even less likely to work than were LILCO's previous proposals. Accordingly, our position stated in our November 18, 1983 testimony and the Board of Education resolution attached thereto -- that LILCO's proposals for schools could not be implemented due to the likely effects of role conflict -- remains firm and unchanged.

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CERTIFICATE OF SERVICE

I hereby certify that copies of Supplemental Direct Testimony of Nick J. Muto and J. Thomas Smith on Behalf of the Middle Island Central School District and Suffolk County Regarding Contention 25 - Role Conflict have been served on the following by U.S. mail, first class, except where noted, this 17th day of January, 1984.

\*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

\*Mr. Frederick J. Chon  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*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

\*By Hand

\*\*By Federal Express



Mr. Brian McCaffrey  
Long Island Lighting Company  
175 East Old Country Road  
Hicksville, New York 11801

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

\*\*Martin Bradley Ashare, 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

\*\*Stephen B. Latham, Esq.  
Twomey, Latham & Shea  
33 West Second Street  
Riverhead, New York 11901

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

Diamond  
ment/Energy Writer  
I  
sland, New York 11747

Gerald C. Crotty  
Counsel to the Governor  
Executive Chamber  
State Capital  
Albany, New York 12224

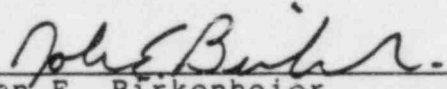
Ben Wiles, Esq.  
Assistant Counsel to the Governor  
Executive Chamber  
State Capital  
Albany, New York 12224

\*Fabian Palomino, Esq.  
Special Counsel to the Governor  
Executive Chamber  
Room 229  
State Capitol  
Albany, New York 12224

\*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

  
John E. Birkenheier  
KIRKPATRICK, LOCKHART, HILL,  
CHRISTOPHER & PHILLIPS  
1900 M Street, N.W., Suite 800  
Washington, D.C. 20036

DATED: January 17, 1984