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April 11, 1984

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BY MESSENGER

William J. Dircks, Director
Office of Nuclear Material Safety and
Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Document Discovery Requests, Docket No. 50-322-OL-4
(Low Power)

Dear Mr. Dircks:

Pursuant to the Board's April 6, 1984 Memorandum and Order, Suffolk County hereby requests the production of the documents described in Attachment A hereto. These documents are to be produced at the offices of Kirkpatrick, Lockhart, Hill, Christopher & Phillips, 1900 M Street, N.W., Washington, D.C.

Suffolk County believes that the Board's April 6 Memorandum and Order is illegal, for reasons which include the fact that the schedule denies the County due process of law. In filing these requests and other requests which may also be filed, the County does not waive its right to seek relief in all appropriate forums.

Very truly yours,

Douglas J. Scheidt
Douglas J. Scheidt

DJS/ss
Attachment
cc: Service List

8404160215 840411
PDR ADOCK 05C00322
G PDR

DS03

ATTACHMENT A

Suffolk County hereby requests the Staff to produce the documents listed below. For purposes of this request, the word "documents" is to be given its broadest meaning to include, without limitation, correspondence, memoranda, reports, notes, computer printouts and other forms of written data and material, all whether in draft or final form. Furthermore,

(i) If a document has been prepared in several copies, or additional copies have been made that are not identical (or are no longer identical by reason of any subsequent notation on or other modification of a copy), each nonidentical copy is to be construed as a separate document if the notations or other modifications thereon are significant to the substance of the document. Identical copies need not be supplied.

(ii) If any document covered by these requests is withheld under a claim of privilege, furnish a list of such document(s) with the following information: date, author, addressee or recipient, persons to whom copies were furnished, subject matter, the privilege which is claimed, and the requests which call for such document(s).

(iii) If any requested document was but is no longer in the Staff's possession or subject to the Staff's control, state what disposition was made of it.

Unless expressly limited, documents to be produced include not only those in the possession or subject to the control of the Staff, but also documents in the possession or subject to the control of the Staff's consultants, and persons under contract with the Staff.

1. With respect to the April 3, 1984 Affidavit of Marvin W. Hodges:

- a. documents showing which of the 38 accident and transient events addressed in Chapter 15 of the FSAR that the Staff believes could not occur during Phase I. Id. at page 2 ¶4.
- b. documents showing which of the 38 accident and transient events addressed in Chapter 15 of the FSAR that the Staff believes could occur during Phase I. Id. at page 2 ¶4.
- c. documents showing the Staff's quantification in absolute terms of the fission product inventory and decay heat values, as a function of post-transient time, for its conclusion that such values "will be very low," and documents showing all assumptions and calculations used in such quantification. Id. at page 2 ¶5.
- d. documents showing which of the Chapter 15 transient and accident events that the Staff believes (a) cannot occur, and (b) can occur, during Phase II; documents showing the assumptions, bases and calculations for the Staff's claim that core cooling can be achieved "even without AC power, using the existing core water inventory and passive heat loss to the environment." See id. at page 3 ¶6.
- e. documents showing all bases, calculations and assumptions, including system physical conditions and length of time operating at which power levels, for the conclusion that "there is plenty of time available for restoring offsite power should onsite power not be available" if a LOCA should occur during Phase II operations. See id. at page 3 ¶7.
- f. documents showing all assumptions used and calculations providing the basis for the Staff's claim that "more than 9 days are available to restore cooling prior to exceeding a temperature of 2200°F," if a LOCA should occur during Phase II testing. See id. at page 3-4 ¶8.
- g. documents showing the Staff's quantification of its claim that "there is a high probability of restoring AC power and cooling the core" even assuming the unavailability of onsite power sources and the occurrence of a LOCA during Phase II testing. See id. at page 4 ¶8.

- h. documents showing the length of time, including person-hours and computer time, expended by the Staff in performing the analysis underlying the claims asserted in the Hodges affidavit.
 - i. documents relied upon by Mr. Hodges and/or by others working with Mr. Hodges in the preparation of the April 3 Affidavit.
- 2. Documents showing reliability data quantifying the reliability of offsite AC power systems associated with any U.S. nuclear plant previously licensed for operation.
- 3. Documents showing the names, locations, and docket numbers of all U.S. nuclear plants licensed by the NRC for low power and full power operation which were not in full compliance with GDC-17.
- 4. Documents showing the names, locations, and docket numbers of all U.S. nuclear plants licensed for operation which use or used sources of power other than redundant onsite diesel generators to comply with the onsite emergency power system requirements, and all documents showing the justification or rationale given by the Staff in such cases.
- 5. Documents showing all calculations, analyses, and assessments performed by the Staff of the reliability of the off-site power supply system proposed by LILCO in the Low Power motion, including the reliability of
 - a. the mobile diesel generators,
 - b. the 20 MW gas turbine,
 - c. the 50 MW gas turbines,
 - d. all other supplemental sources of AC power relied upon by LILCO.
- 6. Documents being referred to as relied on by the Staff in its SER review of the LILCO Motion.
- 7. Documents showing in any way the Staff's position (Staff 3/30/84 filing, p. 5) that the hearing on LILCO's motion should be expedited.
- 8. Documents showing the risks of operating Shoreham at up to 5 percent of rated power, including all Staff analyses or calculations of what the site-specific risks are of such operation at Shoreham.

9. Documents, including analyses, calculations and assumptions, addressing how a seismic event (OBE and/or SSE) would impact upon the supplemental sources of AC power described in the LILCO Supplemental Motion for Low Power Operating License.
10. Documents showing in any way whether LILCO's proposed offsite power sources will be adequately protected from the design basis security threat. (If necessary, provide these documents pursuant to appropriate security safeguards).