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April 11, 1984

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BY FEDERAL EXPRESS

T. S. Ellis, III, Esq.
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Hunton & Williams
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Re: Document Discovery Requests, Docket No. 50-322-OL-4
(Low Power)

Gentlemen:

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 that may also be filed, the County does not waive its right to seek relief in appropriate forums.

Very truly yours,

Douglas J. Scheidt

Douglas J. Scheidt

DJS/ss
Attachment
cc: Service List

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PDR ADOCK 05000322
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ATTACHMENT A

The County hereby requests LILCO 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: data, 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 your possession or subject to your 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 LILCO, but also documents in the possession or subject to the control of LILCO's consultants, persons under contract with LILCO and vendors of equipment or services to LILCO.

1. Documents, including all studies, analyses and calculations, underlying or in any way relating to the LILCO statement on March 29 that the reliability of the Shoreham AC power supply without the TDI diesels is better than the "standard situation" with qualified onsite diesel generators. (See Transcript page 50).
2. Documents showing the unit specifications, past operating history, engine wear rate records, maintenance records, operating-service and maintenance manuals, and operating and testing procedures for (a) the 20 MW gas turbine installed or to be installed at Shoreham, (b) the 20 MW gas turbine at East Hampton, (c) the 15 MW gas turbine at Southold, (d) the ten 50 MW gas turbines at Holtsville, (e) all other gas turbines relied upon by LILCO in its Supplemental Motion, and (f) 20 MW Turbo Power and Marine (Pratt and Whitney) gas turbines, in general.
3. Documents showing the unit specifications, past operating history, maintenance records, engine wear rate records, operating-service and maintenance manuals, and operating and testing procedures for (a) the four mobile diesel-generator units and (b) 2.5 MW General Motors EMD Blackstart mobile diesel generators, model 20-645 E-4, in general.
4. Documents consisting of the approved Technical Specifications governing the operation of the Shoreham plant. If no approved version exists, provide a copy of the latest draft and documents showing specifically where changes are expected or contemplated to accommodate the supplemental sources of offsite AC power.
5. Documents showing all procedures, either approved or in draft form, covering normal operation, surveillance testing and emergency operation of all of the supplemental sources of AC power described in the LILCO Motion of March 20, 1984.
6. Documents showing operator training programs and lesson plans describing the training planned for operation of the supplemental AC power system, documents showing the names and titles of the operators who will receive this training and the schedule for their training.
7. Documents showing procedures and training programs to be conducted to prepare the offsite LILCO systems operator for emergency operation of the system to assure prompt restoration of offsite power to Shoreham.
8. Documents describing the interrelationships of the site-located 20 MW and 50 MW gas turbines, particularly the

arrangements in place or contemplated to prevent system interaction failures between the two units. Documents showing procedures contemplated to protect an adequate supply of fuel in the common fuel tank for emergency operation of the 20 MW gas turbine.

9. Drawings and other documents showing the physical arrangements and the location of the mobile diesel generator units and the exact routing and connections of the temporary power system to the permanent systems.
10. Drawings and other documents showing the physical locations, connection points, and access of all electrical circuits and components associated with the emergency operation of the mobile diesel generators, and documents showing the sources and parameters of automatic starting signals, if any, and of instrumentation and controls necessary for applying the emergency loads.
11. Drawings and other documents showing the physical arrangements and the location of the 20 MW gas turbine and the exact routing and connections of the temporary power system to the permanent systems.
12. Drawings and other documents showing the physical locations, connecting points, and access of all electrical circuits and components associated with the emergency operation of the 20 MW gas turbine, and documents showing the sources and parameters of automatic starting signals, if any, and of instrumentation and controls necessary for applying emergency loads.
13. Drawings and other documents showing the physical arrangements and the location of the 50 MW gas turbines and the exact routing and connections of the temporary power system to the permanent systems.
14. Drawings and other documents showing the physical locations, connecting points, and access of all electrical circuits and components associated with the emergency operation of the 50 MW gas turbines, and documents showing the sources and parameters of automatic starting signals, if any, and of instrumentation and controls necessary for applying emergency loads.
15. Documents describing the fire protection equipment for the mobile diesel generators, the 20 MW gas turbine and the fuel supply tankers.
16. Documents showing the length of time that the mobile diesel-generators can operate at full load without connection to the tank trucks for fuel supply, documents

showing the size of the day tanks for the mobile diesels, and documents showing the procedures for refueling the diesels during operation.

17. Documents concerning in any way the security measures proposed for LILCO's offsite power sources, including the mobile diesels and the 20 MW gas turbine. If necessary, supply such documents pursuant to appropriate security measures.
18. Documents, including analyses, calculations and assumptions, showing, for each source of supplemental AC power, the length of time needed from loss of voltage to supply power to the loads.
19. Documents showing the governor arrangements between the mobile diesels.
20. Documents showing the quantities of air provided by the turbochargers of the mobile diesels for combustion at anticipated loads and at no load.
21. Documents and drawings showing crankcase explosion devices and other safety features including overspeed trips, jacket water temperature cut outs, high exhaust temperature alarms, and lube oil pressure shut down devices for the mobile diesel generators.
22. Documents that describe, address or otherwise concern defects or deficiencies with the Turbo Power and Marine (Pratt and Whitney) 20 MW gas turbine.
23. Documents showing that "the 20 MW gas turbine at Shoreham is virtually identical to the gas turbine at East Hampton," and documents showing that the gas turbine at East Hampton "has had an operational availability of 97.9%." Schiffmacher Affidavit to LILCO Supplemental Motion for Low Power Operating License, at pages 15-16.
24. Documents describing the "newly installed low pressure air start system and fuel control system" of the 20 MW gas turbine at Shoreham. Id. at 15.
25. Documents describing the deadline blackstart capability of the 20 MW gas turbine, and documents concerning the reliability of the deadline blackstart capability.
26. Documents describing the seismic resistance capability of the 20 MW gas turbine, the mobile diesels, and all other AC power sources relied upon by LILCO.

27. Documents that describe, address or otherwise concern defects or deficiencies with 2.5 MW General Motors EMD blackstart mobile diesel generators, model 20-645 E-4.
28. Documents showing the number of LILCO personnel available to construct and restore transmission facilities, the training programs and procedures for the restoration of transmission facilities, the "extraordinary measures being undertaken by LILCO" to preplan such an operation, and documents showing that "LILCO can restore a mile of 69 KV transmission facilities within 24 hours." Schiffmacher Affidavit to LILCO Supplemental Motion for Low Power Operating License, at page 11.
29. Drawings of, and documents describing, the air cooler temperature controls and coolant used for the mobile diesels, and documents showing the temperature controls, if any, for low power operation.
30. Documents showing, for each of the mobile diesels, the ability to correct power factor and the protection against reverse power.
31. 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.
32. Documents showing all protection system inputs and specific set point indications which will be modified or relied upon to assure that operating levels do not exceed five percent power.
33. Documents identifying and describing system tests referred to in the Notaro and Gunther affidavit to the LILCO Supplemental Motion which can only be conducted during nuclear operation.
34. Documents, including all analyses, calculations and assumptions, showing the amount of time necessary to place the reactor in cold shutdown condition in the event of the occurrences listed on pages 22 and 23 of LILCO's Supplemental Motion.
35. Documents, including all studies, analyses and calculations, underlying or relating to the LILCO assertions that "during Phase III approximately five hours would be available to restore make-up water for core cooling before the limits of 10 CFR §50.46 and Appendix K were exceeded [and] During Phase IV approximately one hour would be available to restore cooling water." LILCO Supplemental Motion at page 22.