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April 12, 1984

BY TELECOPIER

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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 Memorandum and Order, Suffolk County hereby requests the production of the documents described in the attachment hereto. Please note that the first four listed items clarify the County's April 11 discovery requests.

Very truly yours,

Douglas J. Scheidt

DJS/ss
 Attachment
 cc: Service List

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Clarification of April 11, 1984 Document Requests

1. In items 2 and 3 of the April 11 requests, the documents to be produced include: (a) all quality assurance ("QA") records (including audits and inspections) for the identified AC power sources; (b) all QA records for systems, structures and components ("SS&Cs") which connect these power sources to the onsite safety-related power grid or which activate or control these AC power sources (including all instrumentation and control systems); (c) all documents that describe or relate in any way to the QA program and/or activities which will be applied to the AC power sources (and connecting SS&Cs) during low power operations; and (d) all documents relating to how these power sources have been installed for service to Shoreham.

2. In item 5 of the April 11 request, the "supplemental sources of AC power" are all the power sources listed in items 2 and 3 of the April 11 requests, plus the transmission lines carrying power to the Shoreham plant and the LILCO interties with the New York and New England power grids. The documents also include all transmission and distribution procedures which will be used instead of normal load dispatching and grid integrity protection procedures.

3. In items 26 and 31 of the April 11 requests, the requested seismic data include documents relating to how SS&Cs connecting the relied-upon AC power sources to the onsite safety-related power grid or which activate or control these AC power sources (including instrumentation and control systems) would react in the event of the OBE or the SSE.

4. In item 34 of the April 11 requests, the documents include the time necessary to achieve cold shutdown at any power level, up to and including 5 percent power.

Additional Document Requests

5. Documents pertaining to the statement at page 22 of the LILCO Motion that LILCO will "take steps to place the reactor in a cold shutdown in the event of . . . an indication of seismic activity of .01g on the on the [sic] Shoreham seismic monitors." Without limiting the scope of this request but by way of illustration, the documents include:

- (a) documents describing the Shoreham seismic monitors, including specifications, capability, and locations;
- (b) documents describing or relating in any way to how much time is predicted to pass

between a recording of 0.01g and a recording of 0.1/or 0.2g; and

- (c) documents describing the procedure(s) which operators will follow to determine whether there is a seismic condition which requires placing the plant in cold shutdown.

6. Documents describing or relating in any way to the duration and sequence of operation of each of the Phases (I-IV) described in the LILCO Motion. Without limiting the scope of this request but by way of illustration, the documents include:

- (a) Documents pertaining to the actual activities (including tests at various power levels) which will be conducted in each Phase;
- (b) Documents pertaining to the duration of each phase and the anticipated duration of the entire low power test program;
- (c) Documents pertaining to the duration of actual operation at each power level;
- (d) Documents pertaining to the actual sequence of each activity and duration thereof in the event LILCO's Motion is granted;
- (e) Documents pertaining to the "progressive steps" referenced at the bottom of page 11 of the LILCO Motion.

7. Documents describing all instrumentation and control systems which will be used to initiate operation, control, or protection of the AC power sources relied upon by LILCO in the Motion, including instruments mounted on the specific equipment; control room mounted equipment; and other equipment for control, monitoring, and protection of the additional power sources.

8. Documents identifying, describing or in any way relating to any preoperation, demonstration, or other tests or procedures to verify the validity and reliability of the interconnected network of new AC power equipment and existing AC power equipment, including how the system would be tested during operation.

9. Documents relating to the man-hour assertions in the Notaro Affidavit and the length of time involved at each power level.

10. For the AC power sources relied upon by LILCO, all documents which identify or relate in any way to applicable regulatory guides and applicable standards and the degree of compliance with each. For example, separation; single failure criteria; fire protection; periodic testing; independence of onsite systems; installation; maintenance; bypassed and inoperable status indication.

11. Documents relating in any way to the LILCO position (e.g., LILCO Motion at 3) that during Phases I and II, AC power is not necessary to satisfy the NRC's regulations.

12. Resumes of all persons LILCO intends to use as witnesses.

13. Documents that relate in any way to the statement in the LILCO Motion (p. 10) that "LILCO's Phase I and II program is designed to provide Shoreham's operating personnel with more BWR experience and training than would result from a conventional program."

14. Documents that relate in any way to the statement in the LILCO Motion (p. 11) that during Phase II, "many events analyzed in Chapter 15 simply could not occur or would be very unlikely when compared to the situation during normal operations."

15. Documents that relate in any way to "LILCO's intention to perform expanded training throughout low power testing" (LILCO Motion at 12).

16. Documents that relate in any way to LILCO's view that operation of Shoreham in Phases III and IV "poses far less risk to the public health and safety than does operation of the plant at 100% rated power" (LILCO Motion at 12).

17. Documents that identify the "applicable requirements of the Shoreham Technical Specifications" (LILCO Motion at 14) which LILCO believes must be met for Phases III and IV.

18. Documents showing transmission and distribution operation procedures which will be used instead of normal load dispatching and grid integrity protection procedures.

19. Documents showing the effect of an overload on the mobile diesels and the 20 MW gas turbine.

20. Documents showing how the electrical cables for the mobile diesels are sheathed, protected and mounted.

21. Documents showing the procedures for startup, synchronization and load sequencing of the mobile diesel generators.

22. Documents, including analyses, calculations and assumptions, showing how many of the four mobile diesel generators are required to supply the minimum loads on the bus. See transcript of March 29, 1984 meeting, at pages 10-11.

23. Documents showing the reliability of the air compressor on the 20 MW gas turbine.