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RELATED CORRESPONDENCE

DOCKETED April 16, 1984
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY) Docket No. 50-322-OL-4
) (Low Power)
(Shoreham Nuclear Power Station,)
Unit 1))

LILCO'S RESPONSE TO
SUFFOLK COUNTY'S APRIL 11, 1984 DOCUMENT DISCOVERY REQUESTS

LILCO hereby responds to Suffolk County's Document Discovery Requests dated April 11, 1984.

General Response

LILCO received Suffolk County's requests on April 12, 1984 and by letter telecopied on April 12, 1984 offered to have documents in response to the request available for review beginning at 12 noon on Friday, April 13, 1984, at the Shoreham Nuclear Power Station and LILCO's offices at Hicksville and Melville. In order to expedite the review, however, LILCO made all documents available for review at either the Shoreham Nuclear Power Station or the Hicksville office.

In order to accomodate the Suffolk County Request in such a short time frame, LILCO conducted a search reasonably calculated to identify documents that represent a substantive response to the information sought by the County. Because of the breadth and lateness of the County's request, LILCO did not make an attempt

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to locate every draft and copy of each document requested. LILCO objects to this aspect of the request as burdensome and oppressive. A good faith effort was made to produce at least a final version of all responsive documents.

Furthermore, LILCO objects to the request that it supply 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." Suffolk County's Document Discovery Requests dated April 11, 1984, Attachment A, page 2. Once again, given the lateness of the County's request, it would be burdensome and oppressive for LILCO to search for, secure and produce possibly responsive documents that may be in the possession of third parties such as vendors. LILCO was able to obtain responsive documents in the possession of General Electric, as will be described below, and they have been produced.

Between the hours of 1:30 p.m. and 5 p.m. on Friday, April 13, 1984, representatives of Suffolk County reviewed documents provided by LILCO at its Shoreham Nuclear Power Station. On Saturday, April 14, 1984, copies of documents requested by the Suffolk County representatives were transported via Federal Express to the offices of Kirkpatrick, Lockhart, Hill, Christopher & Phillips for delivery on Monday, April 16, 1984. The County agreed to assume the expense involved in copying and transporting these documents. LILCO offered to permit review on Friday, Saturday, Sunday and Monday of those documents at Shoreham and at LILCO's offices in Hicksville. No

review was conducted by the County at Hicksville on Friday, Saturday or Sunday and no review of any documents occurred on Saturday and Sunday. On Sunday, April 15, 1984, Suffolk County indicated that it would review those documents beginning at 11:00 a.m. on Monday, April 16, 1984.

LILCO has not produced any documents protected under the work product privilege or trial preparation privilege. The documents withheld pursuant to those privileges are identified on Attachment A hereto. LILCO is in a position immediately to address the County's disagreement, if any, with the privileged claimed as to any of these documents.

Specific Responses

The following identifies LILCO's responses to the specific items included in the County's Document Discovery Requests:

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).

RESPONSE: LILCO produced documents responsive to this request.

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 Southhold, (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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents in response to part (a) of this request. LILCO did not locate any documents in its possession responsive to part (b) of this request or describing any generic problems with GM EMD blackstart diesel generators, model 20-645 E-4. If any such information exists in LILCO's possession it may be in the component tracking computer printout generated by the DRQR for the TD1 diesels. As confirmed by the County's counsel, the County has a copy of that printout.

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.

RESPONSE: LILCO produced a complete copy of the most current Technical Specifications governing the operation of its Shoreham Nuclear Power Station.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced 18 diagrams identified as being responsive to Request Nos. 9, 10, 11, 12, 13 and 14. The diagrams were provided subject to a protective agreement executed by the County. These diagrams also are responsive to this request to the extent that they might indicate where the 50 MW gas turbine is connected to the 20 MW gas turbines. There is no further interrelationship between the turbines.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request. The FSAR, already in the possession of the County, contains information concerning electrical systems at Shoreham.

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.

RESPONSE: LILCO produced documents responsive to this request. The FSAR, already in the County's possession, contains information concerning electrical systems at Shoreham.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

15. Documents describing the fire protection equipment for the mobile diesel generators, the 20 MW gas turbine and the fuel supply tankers.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request. In addition to the documents produced, information contained in SNRC #1033 dated April 13, 1984 and SNRC #1036 dated April 11, 1984, already in the possession of the County, are also responsive to this request.

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.

RESPONSE: The County already has a copy of the site security plan which governs the security of the GM EMD diesel generators. Additional documents will be provided under the protection of a security agreement with the County.

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.

RESPONSE: Some of the information LILCO produced in response to Requests No. 5 and 6 is also responsive to this request.

19. Documents showing the governor arrangements between the mobile diesels.

RESPONSE: The Instructions/Parts Manual for 2,600 kW Diesel Generator Unit responsive to Request Nos. 9, 20, 21, 29 and 30 is also responsive to this request and has been produced.

20. Documents showing the quantities of air provided by the turbochargers of the mobile diesels for combustion at anticipated loads and at no load.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

22. Documents that describe, address or otherwise concern defects or deficiencies with the Turbo Power and Marine (Pratt and Whitney) 20 MW gas turbine.

RESPONSE: LILCO did not locate any documents in its possession responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

25. Documents describing the deadline blackstart capability of the 20 MW gas turbine, and documents concerning the reliability of the deadline blackstart capability.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request. In addition to the documents produced, Exhibit E to the Affidavit of William G. Schiffmacher attached to LILCO's Supplemental Motion for Low Power Operating License is responsive to this request and has previously been served on the County.

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.

RESPONSE: The County is already in possession of DRQR Tracking Reports that are responsive to this request. See the response to Request No. 3(b) above.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

30. Documents showing, for each of the mobile diesels, the ability to correct power factor and the protection against reverse power.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents responsive to this request.

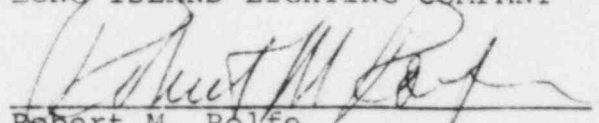
35. Documents, including all studies, analyses and calculations, underlying or relating to the LILCO assertions that "during Phase III approximately five hours would be available to restore make-up water for core cooling before the limits of 10 CFR § 50.46 and Appendix K were exceeded [and] During Phase IV approximately one hour would be available to restore cooling water." LILCO Supplemental Motion at page 22.

RESPONSE: LILCO produced General Electric documents responsive to this request subject to a protective agreement

executed by the County and General Electric.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY



Robert M. Rolfe

Anthony F. Earley, Jr.

Hunton & Williams
P. O. Box 1535
Richmond, Virginia 23212

Dated: APRIL 16, 1984

Documents Withheld Under Claim of Work Product
and Preparation for Litigation Privilege

<u>Request No.</u>	<u>Date</u>	<u>Author/Recipient</u>	<u>Carbon Copies</u>	<u>Subject Matter</u>
26 31	-	**	-	Untitled graph analyzing 18 foot high structure and 69 kv switch, fuse and insulator
26 31	3/15/84	**	-	Overview of seismic pro- tection at the Shoreham 69 kv substation
26 31	-	**	-	Shoreham 69 kv substation, 69 kv switch flexible structure
26 31	3/15/84	Bryan G. van Horne	-	Natural frequency of 69 kv sw/fuse structure at Shoreham 69 kv swyd.
26 31	3/22/84	A.J. Dilthey	-	Shoreham: 69 kv substation, 69 kv switch on 14' high structure
26 31	3/21/84	**	-	Porcelain insulator 69 kv switch on 18.5 ft. structure
26 31	3/28/84	**	-	Porcelain insulator on semirigid structure: 25 hertz

* All documents described herein were prepared by LILCO personnel in specific response to counsel's request that certain information be gathered in preparation for drafting, revising and filing LILCO's Supplemental Motion for Low Power License or in preparation for the hearings to commence April 24, 1984.

** These calculations were unauthored, but were performed by Mr. Dilthey or a member of his staff.

<u>Request No.</u>	<u>Date</u>	<u>Author/Recipient</u>	<u>Carbon Copies</u>	<u>Subject Matter</u>
26 31	3/23/84	A.J. Dilthey	-	Hilite insulators 10' high steel bus column
26 31	3/23/84	A.J. Dilthey	-	Hilite insulator
26 31	3/21/84	**	-	Porcelain insulator on 10' high steel bus column
26 31	3/15/84	A.J. Dilthey	-	Shoreham: 69 kv substation 69 kv insulators - first natural freq. rigid structure
26 31	-	**	-	Shoreham: 69 kv OCB #640 600 A. 1500 MVA
26 31	4/5/84	**	-	Shoreham: 69 kv substation, first, second, and third mode
26 31	3/15/84	A.J. Dilthey	-	Shoreham: 69 kv substation 69 kv insulators - first natural freq. rigid structure
26 31	-	**	-	Shoreham: 69 kv substation 13 kv switch structure natural freq.
26 31	4/15/84	**	-	Shoreham: 69 kv substation 34.5 kv insulator on rigid structure
26 31	3/22/84	**	-	Shoreham: 69 kv substation 13 kv insulator on rigid structure
26 31	3/22/84	**	-	Shoreham: 69 kv substation 13 kv insulators on 11'6" column

<u>Request No.</u>	<u>Date</u>	<u>Author/Recipient</u>	<u>Carbon Copies</u>	<u>Subject Matter</u>
26 31	-	**	-	Case I rigid structure if n = 25 hertz
26 31	-	**	-	Case II rigid structure if n = 50 hertz
26 31	-	**	-	Case III flexible structure if n = 2, w = 9
26 31	-	**	-	Case IV flexible column if n = 14, w = 9
26 31	9/-/60 with undated updates	A.J. Dilthey	-	General bus vibration
26 31	3/7/73 with undated updates	A.J. Dilthey	-	Natural freq.: tubular bus
26 31	2/28/84	A.J. Dilthey	-	Shoreham: earthquake design 138 kv bushings on rigid tank
26 31	2/28/84	A.J. Dilthey	-	Shoreham: earthquake design 138 kv insulator on rigid structure
26 31	3/9/84	P.J. Palace	-	Seismic calculations - 138kv
26 31	3/5/84	P.J. Palace	-	Transformer seismic protection--rough calculations
26 31	3/9/84	Steven C. Kraemer to Al Dilthey	-	Seismic information on line trap supported by 138 kv high strength insulators
26 31	3/5/84	William Quatraro/ A.J. Dilthey	-	S. Kraemer -- What is the approximate cost for a seismic battery rack?

<u>Request No.</u>	<u>Date</u>	<u>Author/Recipient</u>	<u>Carbon Copies</u>	<u>Subject Matter</u>
26 31	2/29/84	I.C.	-	Comments regarding experiences with earthquakes and their effects on transmission equipment
26 31	2/29/84	William Quatraro/ A.J.Dilthey	-	What G force will your equipment withstand in an earthquake?
26 31	-	**	-	The design of transmission facilities and substations to withstand earthquakes
26 31	2/29/84	H.F. Mattutat W.G. Schiffmacher	A.M. Madson W.G. Vogel	Capability of 20 mw gas turbine generator, 69 kv switchyard to withstand DBE of 0.2g ground acceleration
33	-	William Gunther	-	Operational benefits of obtaining low power license

LILCO, April 16, 1984

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CERTIFICATE OF SERVICE

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-4
(Low Power)

I hereby certify that copies of Response to April 11 Document Discovery Requests were served this date upon the following by first-class mail, postage prepaid, unless otherwise noted.

Judge Marshall E. Miller,
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Judge Glenn O. Bright
Atomic Safety and Licensing
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Judge Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box X, Building 3500
Oak Ridge, Tennessee 37830

Eleanor L. Frucci, Esq.
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Edward M. Barrett, Esq.
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

The Honorable Peter Cohalan
Suffolk County Executive
County Executive/Legislative
Building
Veteran's Memorial Highway
Hauppauge, New York 11788

Bernard M. Bordenick, Esq.
Edwin J. Reis, Esq.
Office of the Executive Legal
Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Alan R. Dynner, Esq.*
Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
8th Floor
1900 M Street, N.W.
Washington, D.C. 20036

James Dougherty, Esq.
3045 Porter Street
Washington, D.C. 20008

Martin Bradley Ashare, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

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

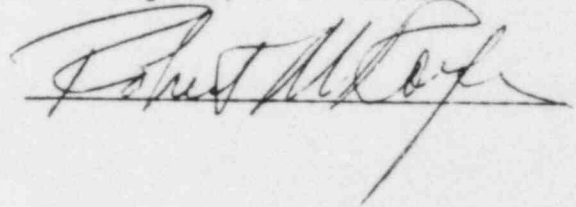
DATED: April 16, 1984

Jay Dunkleberger, Esq.
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Mr. Martin Suubert
c/o Congressman William Carney
1113 Longworth House Office
Building
Washington, D.C. 20515

Mr. Brian McCaffrey
Nuclear Operations Support
Long Island Lighting Company
P.O. Box 618
Wading River, New York 11792

Docketing and Service
Branch (3)
Office of the Secretary
U.S. Nuclear Regulatory
Washington, D.C. 20555



*By Federal Express