

LILCO RECEIVED 16, 1984
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UNITED STATES OF AMERICA 84 APR 19 10:52
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 12, 1984 DOCUMENT DISCOVERY REQUESTS

LILCO hereby responds to Suffolk County's Document Discovery Requests dated April 12, 1984 (the second request).

General Response

LILCO received at approximately 5:45 p.m. on April 12, 1984, the second Document Discovery Requests by the County. Subject to the same objections as LILCO expressed as to the County's Document Discovery Requests dated April 11, 1984, LILCO attempted to locate all documents responsive to the second requests.

Below is a detailed description of LILCO's response to the second document requests. The response begins with Request No. 5 because Request Nos. 1-4 were clarifications of the April 11, 1984 document request. These clarifications were addressed in LILCO's response to the April 11, 1984 Request. Responsive documents withheld under a claim of work product privilege or trial preparation privilege are identified on Attachment A hereto. LILCO is in a position immediately to address the

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County's disagreement, if any, with the privileged claimed as to any of these documents.

Specific Responses

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;

RESPONSE: LILCO produced documents responsive to this request. The Technical Specifications and the FSAR already in the possession of the County, also contain responsive information.

- (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

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

- (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.

RESPONSE: LILCO produced documents responsive to this request.

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;

RESPONSE: LILCO produced documents responsive to this request pursuant to the April 11, 1984 Document Discovery Request No. 33.

- (b) Documents pertaining to the duration of each phase and the anticipated duration of the entire low power test program;

RESPONSE: LILCO produced documents responsive to this request.

- (c) Documents pertaining to the duration of actual operation at each power level;

RESPONSE: LILCO produced documents responsive to this request.

- (d) Documents pertaining to the actual sequence of each activity and duration thereof in the event LILCO's Motion is granted;

RESPONSE: LILCO produced documents responsive to this request.

- (e) Documents pertaining to the "progressive steps" referenced at the bottom of page 11 of the LILCO Motion.

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: LILCO produced documents in existence and responsive to this request pursuant to the April 11, 1984 Document Discovery Request Nos. 10, 12 and 14.

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.

RESPONSE: Documents responsive to this request will not be prepared until after the installation of the equipment.

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

RESPONSE: LILCO produced documents responsive to this request.

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.

RESPONSE: The County already has in its possession the documents necessary to determine any regulatory guides or standards applicable to the AC power sources. LILCO produced documents pursuant to the April 11, 1984 Document Discovery Request from which the County will be able to assess the compliance of the power sources with those standards.

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.

RESPONSE: The County already has LILCO's Supplemental Motion for a Low Power License and its supporting affidavits. The FSAR, also in the County's possession, contains information responsive to this request.

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

RESPONSE: LILCO produced documents responsive to this request.

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."

RESPONSE: The County already has a copy of the Notaro Affidavit. LILCO also produced training documents pursuant to the April 11, 1984 Document Requests Nos. 6 and 7. LILCO does not currently have any other documents in its possession responsive to this request.

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."

RESPONSE: Chapter 15 of the FSAR, already in the County's possession, contains information responsive to this request.

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

RESPONSE: See response to Request No. 13 above.

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).

RESPONSE: The County has copies of the affidavits supporting LILCO's Supplemental Motion. Chapter 15 of the FSAR, already in the County's possession, also contains information responsive to this request.

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.

RESPONSE: The County has been provided with the latest Shoreham Technical Specifications. Additional Technical Specifications that will be responsive to this request are currently being drafted.

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

RESPONSE: LILCO produced documents responsive to this request pursuant to the April 11, 1984 Document Discovery Requests No. 5.

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

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

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

RESPONSE: LILCO produced documents responsive to this request pursuant to the April 11, 1984 Document Discovery Requests No. 9.

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

RESPONSE: LILCO produced documents responsive to this request pursuant to the April 11, 1984 Document Discovery Requests No. 5.

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.

RESPONSE: LILCO has not completed the analyses referred to in this request and, therefore, does not have documents available at this time.

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

RESPONSE: To the extent that documents responsive to this request exist, they would be found in the manuals produced pursuant to the April 11, 1984 Document Discovery Request No. 2.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY



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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>
6	-	William Gunther	-	Table and Appendices - Time Summary of the 5% Power Tests
16	-	-	-	LOCA Analysis (likelihood of pipe break)
	-	-	-	Analysis of result of Chapter 15 events
10	3/2/84	Dr. H. Chau	-	NRC regulatory requirements
	-	H. Chau, D. Baker, E. Kosgra, P. LaBlanc		

* 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.

LILCO, April 16, 1984
USNRC

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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 12 Document Discovery Requests were served this date upon the following by first-class mail, postage prepaid, unless otherwise noted.

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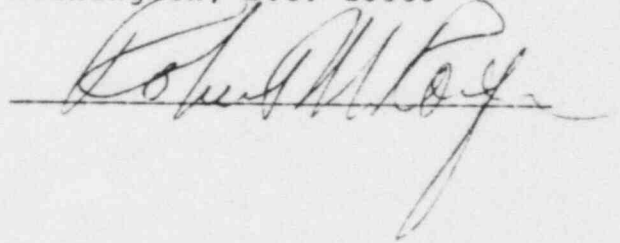
DATED: April 16, 1984

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