

752
754

DOCKETED
4/19/84

'84 APR 23 AIO:42

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
PLANNING & SERVICE
BRANCH

In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station,
Unit 1)

Docket No. 50-322-OL

SUFFOLK COUNTY'S MOTION FOR LEAVE TO REPLY TO
LILCO'S RESPONSE TO JOINT OBJECTIONS OF SUFFOLK COUNTY
AND THE STATE OF NEW YORK TO BOARD'S ORAL ORDER OF
FEBRUARY 22, 1984, AND REQUEST FOR REVISION THEREOF

Suffolk County hereby moves for leave to reply to LILCO's Response dated April 17, 1984 (received by the County on April 18), in order to correct certain misstatements of fact in LILCO's Response regarding:

- (1) The nature and wording of the County's February 17, 1984 notification to LILCO concerning potential depositions;
- (2) The extent of LILCO's failure to comply with the County's discovery requests;
- (3) The nature and extent of the County's identification of documents at TDI on March 22 and 23.

If the County is given the opportunity to address these facts orally at a conference of counsel, whether in person or by tele-

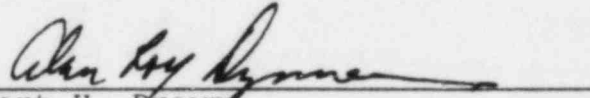
8404230341 840419
PDR ADDCK 05000322
PDR
6

DS03

phone, before the Board rules on the Joint Objections, this Motion may be considered to be withdrawn.

Respectfully submitted,

Martin Bradley Ashare
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11788



Herbert H. Brown
Lawrence Coe Lanpher
Alan Roy Dynner
Douglas J. Scheidt
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

Attorneys for Suffolk County

April 19, 1984

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 O.L.

(Shoreham Nuclear Power Station,)
Unit 1))
_____)

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S MOTION FOR LEAVE TO REPLY TO LILCO'S RESPONSE TO JOINT OBJECTIONS OF SUFFOLK COUNTY AND THE STATE OF NEW YORK TO BOARD'S ORAL ORDER OF FEBRUARY 22, 1984, AND REQUEST FOR REVISION THEREOF, dated April 19, 1984, have been served on the following this 19th day of April 1984 by U.S. mail, first class, except as otherwise indicated.

Lawrence J. Brenner, Esq.*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ralph Shapiro, Esq.
Cammer and Shapiro
9 East 40th Street
New York, New York 10016

Dr. George A. Ferguson*
Administrative Judge
Atomic Safety and Licensing Board
School of Engineering
Howard University
2300 6th Street, N.W.
Washington, D.C. 20059

Mr. Stuart Diamond
Business/Financial
NEW YORK TIMES
New York, New York 10036

W. Taylor Reveley, III, Esq.
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Dr. Peter A. Morris*
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

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

Robert E. Smith, Esq.
Guggenheimer & Untermeyer
80 Pine Street
New York, New York 10005

Mr. Brian R. McCaffrey
Long Island Lighting Company
Shoreham Nuclear Power Station
P.O. Box 618
North Country Road
Wading River, New York 11792

Joel Blau, Esq.
New York Public Service Commission
The Governor Nelson A. Rockefeller
Building
Empire State Plaza
Albany, New York 12223

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

Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Bernard M. Bordenick, Esq.#
Edwin J. Reis, Esq.
Richard J. Goddard, Esq.
Office of Exec. Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Stephen B. Latham, Esq.
Twomey, Latham & Shea
P.O. Box 398
33 West Second Street
Riverhead, New York 11901

Mr. Marc W. Goldsmith
Energy Research Group, Inc.
400-1 Totten Pond Road
Waltham, Massachusetts 02154

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

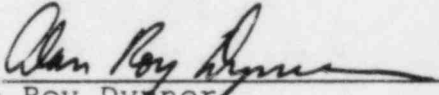
Hon. Peter F. Cohalan
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

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

Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Jonathan D. Feinberg, Esq.
Staff Counsel
New York State Public
Service Commission
3 Rockefeller Plaza
Albany, New York 12223

Stewart M. Glass, Esq.
Regional Counsel
Federal Emergency Management
Agency
26 Federal Plaza
New York, New York 10278



Alan Roy Dynner
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

DATE: April 19, 1984

By Federal Express
* By Hand Delivery
By Telecopier