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April 20, 1984

(BY HAND)

Marshall E. Miller, Chairman
Mr. Glenn O. Bright
Ms. Elizabeth B. Johnson
Administrative Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
4350 East-West Highway
Bethesda, Maryland 20814

Re: Shoreham Low Power Proceeding,
Docket No. 50-322-OL-4

Dear Administrative Judges:

Suffolk County is unable to submit any prefiled testimony because of the prohibitively short schedule which the Board ordered in this proceeding. Under that schedule, it was impossible for the County's consultants to obtain, review and analyze information necessary for them to prepare testimony on LILCO's low power proposal by April 20, 1984.

If a reasonable schedule had been established by the Board, the County would have submitted testimony by the following experts retained by the County: (1) Sierra Energy and Risk Assessment, Inc., concerning an assessment of the reliability of the AC power sources proposed by LILCO for low power operation and a comparison of these power sources with a system of three operable and qualified diesel generators; (2) Dr. Christian Meyer and Dr. Jose M. Roesset, concerning the likely impact of the SSE on LILCO's AC power systems; and (3) Mr. G. Dennis Eley, concerning the reliability of the GM mobile diesels. Mr. Gregory Minor and/or Mr. Dale G. Bridenbaugh of MHB Technical Associates may have filed testimony as well.

If the Board had announced procedures for addressing security issues, the County would have utilized services of the Suffolk County Police Department ("SCPD") and perhaps other experts. In the past Messrs. Marc Goldsmith, Brian Jenkins and Richard White have appeared for the County on security matters in addition to the SCPD personnel. After performance of analyses

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and pursuant to appropriate procedures, these or other qualified persons would have testified at the low power hearing.

Finally, if the Board had established a reasonable schedule, the County would have retained additional experts, including:

- (a) Gas turbine experts to analyze the reliability of the 20 MW used gas turbine being installed onsite and the timing capability of the dead line black start system when used on this gas turbine design.
- (b) Power system grid reliability experts to analyze the reliability of the LILCO grid and its interconnections to other systems. This is a key parameter in determining the expected number of demands on the backup onsite configuration proposed by LILCO.
- (c) Human factors experts to analyze the necessary operator actions to synchronize and load the 2.5 MW EMD mobile diesels. These same experts would review and analyze the LILCO interim procedures (some are now in draft form), and the maintenance procedures once they are provided.
- (d) QA experts to evaluate the impact of (1) proposed diesel and gas turbine maintenance practices, (2) construction and installation practices of the new non-seismic, non-Class I diesels and gas turbines, and (3) the history of construction, qualification and maintenance applied to these non-Class I equipment on the reliability of their future operation.
- (e) Geologists to analyze the terrain over which the offsite power is transmitted and the soil profiles when critical equipment is being located for the LILCO proposed interim solution for loss of offsite power.

These experts would have presented testimony at the low power hearing.

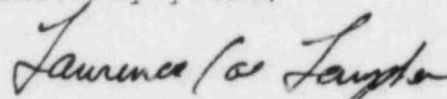
The County will shortly submit affidavits of its experts which document further the fact that under the restrictive

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schedule established by the Board's April 6 Order, it was impossible for the County to submit prefiled testimony and present the affirmative case which it wished to do on behalf of its citizenry.

Sincerely yours,

A handwritten signature in cursive script, reading "Lawrence Coe Lanphier".

Lawrence Coe Lanphier

LCL/dk

cc: Service List