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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

Docket No. 50-322-OL-3
(Emergency Planning)

SUFFOLK COUNTY MEMORANDUM IN OPPOSITION
TO LILCO MOTION TO SET SCHEDULE FOR PARTIAL
INITIAL DECISION ON "GROUP I" EMERGENCY
PLANNING ISSUES

On April 13, 1983, LILCO filed a Motion to Set Schedule for Partial Initial Decision on "Group I" Emergency Planning Issues" (hereinafter, LILCO "Motion"). Suffolk County opposes the LILCO Motion.

A. Introduction

In its Motion LILCO requests the Board to set a schedule for the submission of proposed findings of fact and conclusions of law relating to three of the emergency planning contentions -- Contentions 23, 25, and 65 -- known as "Group I" issues because they were the first three contentions to come to hearing. LILCO suggests that all parties should be required to file such findings on May 18, 1984, with reply findings due June 1, 1984,

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in order to produce a Partial Initial Decision by July. (Motion at 1-2). LILCO suggests that there are three "compelling" needs for such a schedule: (1) writing findings will be "easier and more reliable" if the record is fresh in the parties' minds; (2) the size and complexity of the record "virtually compels" breaking the finding process into parts; and, (3) findings related to the health and safety issues in this proceeding were submitted in three phases. (Motion at 2).^{1/}

The County has previously stated on the record several specific reasons why a Partial Initial Decision on only three emergency planning contentions would be inappropriate prior to completion of the hearing on all emergency planning issues, and impractical in any event if proposed findings were to be submitted during the hearing process without building into the hearing schedule additional time for that purpose. (See Tr. 703-704; 2199-2203). LILCO's Motion fails to address any of the problems previously identified by the County, and as the County will demonstrate below, those problems substantially outweigh LILCO's arguments in favor of its proposal. In

^{1/} For the reasons discussed in Section B.5 below, LILCO's characterization of the "precedent" in this proceeding is incorrect and misleading; in fact the "precedent" supports the County's position on this matter.

addition, LILCO provides no justification at all in its Motion for its suggested shortening of the time limits and change in the order of filing proposed findings which are set forth in 10 CFR § 2.754 for the submission of proposed findings. Finally, LILCO fails to explain how or why its proposal could or should be implemented by the parties or the Board in light of the hearing schedule already set by this Board.

B. Discussion

1. Portions of the "Group II" Record are
Essential to Proposed Findings and a Partial
Initial Decision on "Group I" Contentions

The contentions at issue concerning LILCO's proposed emergency plan are interrelated and in many cases overlap. With very few exceptions, each contention involves factual premises, provisions or assumptions in LILCO's Plan, factual allegations, and legal issues, that are also discussed in other contentions. Such interrelationships and overlapping issues are manifest on the face of the contentions themselves, and they include both the so-called "Group I" and "Group II" contentions. Accordingly, it would be impossible to brief the "Group I" issues without having the benefit of and making detailed reference to the "Group II" record. Since the "Group II" record is still being developed, no adequate brief could now be prepared. Some

examples set forth below document that the "Group II" record is essential to any brief or Partial Initial Decision on "Group I" issues.

- a. The issues raised in "Group I" and Group II contentions are interrelated.

Contention 23 (Group I) alleges that people in the EPZ will evacuate even if advised to do nothing or to shelter. Contention 15 (Group II) raises the related issue that people will not believe or follow protective action recommendations that come from LILCO. Clearly, the two issues are closely related, and this Board cannot make a finding that protective actions under the LILCO Plan could or would be implemented, as required by 10 CFR § 50.47(a)(1) which is referenced in both Contentions 23 and 15, without consideration of the evidence as to both issues.

Similarly, Contention 25 (Group I) alleges that role conflict will result in inadequate numbers of personnel being available to implement the LILCO Plan, including school and school bus personnel, ambulance drivers, and medical and paramedical personnel. Contention 24 (Group II) alleges that LILCO has failed to obtain agreements necessary to assure the availability of sufficient personnel to implement protective

actions, including evacuation, for school children or patients in hospitals or special facilities. Contention 70 (Group II) alleges that the LILCO Plan fails to indicate either how a school evacuation could or would be implemented, or that schools have performed "preplanning" for an implementable evacuation; similarly, Contention 72 (Group II) alleges that the Plan fails to provide how an evacuation of special facility patients could be implemented. Once again, it is clear that all these issues are closely related. This Board cannot make a finding that the protective action of evacuation for school children and persons in special facilities could or would be implemented under the LILCO Plan, as required by 10 CFR § 50.47(a)(1) which is referenced in Contentions 25, 24, 70 and 72, without considering the evidence on all these issues.

Finally, Contention 65 (Group I) alleges that LILCO's evacuation time estimates for the regular population are inaccurate, unreliable, and far too low for several reasons, including inadequate consideration of mobilization times (65.A and B), inability of LILCO's traffic guides to control traffic or reduce congestion (65.C), improper assumptions about road blockages (65.D), and failure to take into account special evacuation of schools and health facilities (65.E). Contention 69 (Group II), which is expressly referenced in Contention 65,

discusses the length of time necessary to complete an early dismissal of school children, a prerequisite to family mobilization for evacuation which is discussed in Contention 65. Contention 15 (Group II) alleges that motorists will not follow instructions from LILCO's traffic guides, and Contentions 40, 99 and 100 (Group II) allege that LILCO's training program will not produce traffic guides who are capable of directing or controlling traffic. Contention 27 (Group II) alleges that LILCO will be unable to mobilize traffic guides, road crews and other necessary personnel in a timely manner. Contention 66 (Group II) alleges that LILCO will be unable to remove obstacles from roadways or to provide fuel to prevent cars from running out of gas and blocking roadways, and thus, congestion will result in reduced roadway capacities and longer evacuation times. Contentions 67, 71, 72, and 73 all allege that evacuation times for persons without vehicles, school children, handicapped persons and persons in special facilities will be too long to provide adequate protection. It cannot be disputed that the issues raised in these "Group II" Contentions (69, 15, 40, 99, 100, 27, 66, 67, 71, 72 and 73) are directly related to the issues raised in Contention 65. Thus, this Board cannot make a finding on Contention 65 without consideration of the evidence on these other contentions which bear directly on Contention 65.

Clearly, the three "Group I" contentions cannot be viewed in isolation from the remaining "Group II" contentions.

- b. Testimony on "Group II" issues
relates to "Group I" contentions.

The testimony filed by the parties in this proceeding further evidences the interrelated and overlapping nature of "Group I" and "Group II" issues. Several specific examples follow.

First, LILCO's testimony on Contention 23 (Group I) includes a lengthy discussion about LILCO's EBS messages, their credibility, and whether people will believe or follow them. See Testimony of Matthew C. Cordaro et al., on Behalf of the Long Island Lighting Company on Phase II Emergency Planning Contentions 23 (Shadow Phenomenon) and 65.C.2 and 65.F (Panicked Drivers) (hereinafter "LILCO Testimony on Contention 23") at 24-32, 44-45, 50-52. The County's witnesses address those matters in their testimony on Contention 15 (Group II). See, e.g., Testimony of Arthur H. Purcell et al. Regarding Contentions 11 and 15, at 35-72. Similarly, LILCO's testimony on Contention 23 (Group I) discusses the way emergency information, including LILCO's public information brochure, may affect evacuation behavior. See LILCO Testimony on Contention

23 at 22-52, 63-66. The parties have not yet submitted testimony on Contention 16 (Group II); however, the issue that will be addressed in such testimony is whether LILCO's brochure is accurate and credible and thus whether it can be relied upon to elicit appropriate emergency responses from the public. Finally, in their testimony on Contention 23, the LILCO witnesses discuss the question whether people will tend to evacuate because they see their neighbors evacuating, and they assert that public education is the primary way to prevent "inappropriate" evacuation. See LILCO Testimony on Contention 23 at 121-124. The County's testimony on Contention 22.D (Group II) rebuts this LILCO testimony by explaining how the selection of emergency planning zone boundaries can affect "appropriate" and "inappropriate" responses to evacuation orders. See Direct Testimony of Philip B. Herr on Behalf of Suffolk County Regarding Emergency Planning Contention 22.D -- Inadequacy of LILCO's EPZ, at 5-8, 10-11.

In their testimony on Contention 25 (Group I), the LILCO witnesses discuss various aspects of the LILCO training program, and assert that because LILCO's proposed training will be effective, there will be qualified emergency workers available to implement the LILCO Plan. See Testimony of Matthew C. Cordaro et al. on Behalf of Long Island Lighting Company on

Phase II Emergency Planning Contention 25 (Role Conflict), at 18, 26-27, 32-38, 100-102. The County's witnesses address the LILCO training program in their testimony on the training Contentions 39, 40, 41, 44, 98, 99 and 100 (Group II). See Testimony of Deputy Inspector Peter F. Cosgrove et al. in Support of Emergency Planning Contentions 39, 40, 41, 44, 98, 99 and 100 -- Training of Offsite Emergency Response Workers.

In their testimony on Contention 65 (Group I), the County's witnesses discuss the fact that without coordination between and among LILCO's traffic guides, there will be conflicting traffic flows and congestion, thereby further delaying evacuation times. See Amended Direct Testimony of Inspector Richard C. Roberts et al. on Behalf of Suffolk County Regarding Emergency Planning Contentions 65 and 23.H -- Evacuation Time Estimates and EPZ Access Control, at 42-44. The fact that LILCO's traffic guides will be unable to coordinate their traffic control efforts, because they will be unable to communicate with each other, is addressed in the County's testimony on Contentions 28-32 and 34 (Group II). See Direct Testimony of Deputy Inspector Kenneth J. Regensburg et al. on Behalf of Suffolk County Regarding Emergency Planning Contentions 28, 29, 30, 31, 32 and 34 -- Communications Among Emergency Response Personnel, at 10-21, 23-36, 41-43. The issues addressed in the County's

testimony on subpart C of Contention 65 -- that LILCO's traffic guides will be unable to control traffic and will add to rather than reduce congestion, thus increasing evacuation times -- are further explained in the County's Testimony on Contention 27 (Group II) and Contentions 39, 40, 41, 44, 98, 99 and 100 (Group II). This "Group II" testimony addresses the facts that (1) LILCO's traffic guides will not be timely mobilized at their posts so they can control traffic during an evacuation, and (2) LILCO's traffic guides will be unable to control traffic because of inadequate training. The County's "Group II" testimony on Contentions 66, 69, 72 and 73 also discuss in detail the factors identified in the Contention 65 (Group I) testimony as impacting evacuation time estimates. The LILCO witnesses also further address the factors impacting the accuracy and reliability of LILCO's evacuation time estimates discussed in their Contention 65 (Group I) testimony, in their "Group II" testimony on Contentions 27, 67, 69, 66, 72 and 73.^{2/}

^{2/} See also, the following portions of the County's and LILCO's "Group I" testimony, where the witnesses expressly refer to related "Group II" testimony: LILCO Testimony on Contention 65, at 11 and 12; LILCO Testimony on Contentions 23, 65.C.2, and 65.F, at 27; Suffolk County Testimony (Erikson and Johnson) on Contention 25, at 30, 31; Suffolk County Testimony (Harris) on Contention 25, at 4, 6, 7 and 10; Suffolk County Testimony (Zeigler and Johnson) on Contention 23, at 36; Suffolk County Testimony

(Footnote cont'd next page)

The above discussion demonstrates that a Partial Initial Decision based, as suggested by LILCO, solely on the "Group I" record could not properly or accurately reflect the actual evidentiary record in this proceeding. Instead, it would be based on a blatantly incomplete record. As just one example, in ruling on the credibility of LILCO's EBS messages and whether the public would be likely to follow the advice in those messages, which LILCO asserts as an argument in support of its position on the "Group I" Contention 23, a Partial Initial Decision on Contention 23 would of necessity be completely one-sided. The decision could be based only on LILCO's testimony on that subject; the County's testimony, which rebuts the opinions of LILCO's witnesses in their Contention 23 testimony, is contained in the "Group II" record (on Contention 15), which has not yet come to hearing. Thus, the proposed findings and the resulting Board opinion suggested by LILCO would be devoid of half the relevant evidence on a major issue raised in the litigation of the Contention 23 issue. The same would be true with respect to all the other examples cited above.

(Footnote cont'd from previous page)

(Pigozzi) on Contentions 65 and 23.D, at 19; Suffolk County Testimony (Herr) on Contentions 65 and 23.D, at 9, 17; Suffolk County Testimony (Saegert) on Contention 65, at 9.

The County submits that issuing a Partial Initial Decision based on such a clearly incomplete record would be improper and in violation of 10 CFR § 2.760(c), which requires that such a decision "will be based on the whole record" LILCO's proposal must be rejected because the contents of the emergency planning contentions and testimony require that the "Group II" record be considered in connection with the "Group I" issues.

2. There are no FEMA Findings in the "Group I" Record and Therefore no Partial Initial Decision is Possible on that Record

Section 50.47(a)(2) provides in pertinent part as follows:

The NRC will base its finding on a review of the Federal Emergency Management Agency (FEMA) findings and determinations as to whether State and local emergency plans are adequate and whether there is reasonable assurance that they can be implemented. . . . In any NRC licensing proceeding, a FEMA finding will constitute a rebuttable presumption on questions of adequacy and implementation capability.

The FEMA findings relating to Revision 3 of the LILCO Plan were not provided to the NRC until March 15, 1984. They are not yet in evidence in this proceeding, and, under LILCO's proposal, could not be a basis for any proposed findings or the Partial Initial Decision on "Group I" issues.

Moreover, the FEMA testimony which is part of the "Group I" record is not related to the Shoreham plant or the LILCO Plan; the FEMA witness expressly stated that he had not reviewed the LILCO Plan, that at the time of that testimony FEMA was only beginning its review of the LILCO Plan, and that the ultimate FEMA findings resulting from that review would supercede any prior Shoreham-related findings or opinions by FEMA. See Tr. 2087-88; 2161-64.

The FEMA findings relating to Revision 3 of the LILCO Plan will be submitted into evidence, presumably on May 29, 1984, as part of the FEMA testimony filed on April 19, 1984. The FEMA witnesses state that their April 19, 1984 testimony represents "the current FEMA evaluation" of the LILCO Plan, Revision 3. The FEMA testimony which is in the "Group I" record does not contain such a statement. Clearly, the FEMA findings are not in the "Group I" record.

Because this Board's decision on the "Group I" contentions must be based on FEMA findings, any Partial Initial Decision based only on the "Group I" record, as suggested by LILCO, would violate 10 CFR § 50.47(a)(2).

3. The Proposed Findings Suggested by LILCO
Would be Useless

This Board has already seen the result of the parties' efforts to prepare proposed findings based on a partial, rather than a complete record. On November 28, 1983, before the hearing commenced and therefore prior to any cross-examination, the parties submitted proposed findings on the three "Group I" contentions based just on the written testimony of the parties on those three contentions, pursuant to the Board's Order of October 26, 1983. The Board subsequently observed that the submissions were of little if any value. See Tr. 682-83; 2219-20.

LILCO's proposal for submission of yet another incomplete set of proposed findings would result in documents which, while more voluminous than the previous versions, would, of necessity, be of similar value. First, they would not be able to present all the facts relevant to the issues raised in the "Group I" contentions because, as just described, many of the issues in "Group II" contentions, and the testimony filed on the "Group II" issues (not yet in the record) are directly related to the "Group I" contentions. Thus, any proposed findings limited to the "Group I" record would have to be amended and supplemented, perhaps several times, as the "Group II" record comes into being.

Second, as noted above, the "Group I" record does not include any FEMA findings. Accordingly, any proposed findings based on the "Group I" record would have to be amended and supplemented not only to reflect the FEMA findings after they become part of the record, but also to reflect the evidence to be submitted by the other parties to the proceeding in order to rebut the FEMA findings which, as stated in 10 CFR § 50.47(a)(2), are a rebuttable presumption in this proceeding.

Third, the "Group I" contentions were based on Revision 0 of the LILCO Plan. LILCO has since created a Revision 3, upon which the "Group II" contentions and the County's and New York State's "Group II" testimony is based. And, in their "Group II" written testimony, as well as during cross examination, LILCO witnesses have discussed many Plan changes that, while not contained in Revision 3, are "anticipated," "expected," "planned," or already exist somewhere other than in a revision of the Plan that has been submitted to the Board and parties.

In addition, the NRC has expressly requested LILCO to revise its Plan in response to the FEMA findings of March 15, 1984 (see letter dated March 20, 1984, from Thomas T. Martin, Director NRC Region I Division of Engineering and Technical Programs, to M.S. Pollock, former LILCO Vice

President-Nuclear), and LILCO has asked to meet with FEMA for the purpose of proposing various additional changes in its Plan which are, apparently, intended to respond to the numerous deficiencies in the Plan identified by FEMA.

The precise effect of all these Plan revisions (including all those which LILCO has stated it intends to make in the future but has not yet identified for the County or the Board), on the "Group I" issues cannot be stated at this point. Clearly, however, as LILCO continues to revise its Plan, the revisions will be discussed on the record of this proceeding. None of the revisions made subsequent to January 1984 are in the "Group I" record; however, such revisions are certain to affect the proposed findings to be submitted by the parties, and the Board's ultimate decision on the "Group I" issues, since those issues are dependent upon specific provisions in the LILCO Plan, and such provisions have been in a constant state of flux.

There is no indication either that LILCO intends to stop changing its Plan and the "plans" or "expectations" for its Plan as long as this proceeding continues, or that this Board intends to require LILCO to rely in its license application on a particular defined version of a Plan, despite the County's

repeated requests that the Plan being litigated in this proceeding be identified and defined. Accordingly, until the record is closed (which the County presumes will be done when the hearing is completed), any proposed findings based solely on the "Group I" record will have to be amended and supplemented as LILCO's past and anticipated future Plan revisions become known, piecemeal, during the "Group II" hearing process. The proposed findings and Partial Initial Decision suggested by LILCO literally would be out of date before they were written.

Fourth, LILCO fails either to suggest or to demonstrate any purpose that would be served by this Board's preparation of a Partial Initial Decision on three emergency planning contentions considered in isolation, when it will subsequently have to prepare a second Partial Initial Decision on the remaining 65 admitted contentions which are inextricably intertwined with the first three. The first Partial Initial Decision would not result in an earlier issuance of a license to LILCO, or serve any other useful purpose that the County can imagine. Thus, the LILCO proposal would result in a waste of time and resources without serving any useful purpose.

In sum, it would be wasteful and inefficient to go through a process of preparing, with the Board reviewing, the proposed

findings suggested by LILCO because they would have to be substantially revised and supplemented beginning shortly after their submission, and probably continually throughout the remainder of this proceeding. Such an exercise would also serve no useful purpose. LILCO's Motion should therefore be denied.

4. It would be Impossible to Implement LILCO's Proposal without a Change in the Schedule Already Set by this Board

In its Motion, LILCO suggests that all parties should submit proposed findings on May 18. That is 35 days after the date of LILCO's Motion, and 25 days after the date of this Memorandum. Under the Board's existing schedule, the parties will actually be in hearings for 12 of those days, and the remainder will be used to prepare for those hearing sessions and the three week session scheduled to begin on May 29, 10 days after LILCO's proposed filing date. LILCO also suggests that all parties should file reply findings to the other parties' findings on June 1, 1984, 14 days later, and assumes the Board could issue a decision "by July." Under the Board's current schedule, the Board and parties will actually be in hearings from May 29 through June 15, and presumably also in July, although no precise dates have been set.

LILCO's proposal is absurd. The Group I issues involve 1,980 pages of prefiled testimony, and 3,205 pages of hearing transcript. The proposed findings on those issues will obviously be lengthy (the preliminary findings already filed by the parties were very lengthy and they did not include any references to the contents of the hearing record). It will take a substantial amount of time to review the voluminous record, draft the findings, have them reviewed by witnesses, and finalize them. The process simply cannot be accomplished while the hearing is in progress and certainly not under the schedule LILCO proposes. The County's lawyers who are intimately familiar with the emergency planning issues are all involved in the litigation of the "Group II" issues which are now in hearing, and all were also involved with the "Group I" issues which LILCO suggests should be briefed while the hearing is going on. These people cannot do two things at once, and certainly not with the quality that this extensive record will demand.

LILCO similarly fails to state any basis for its suggestion that proposed findings in this case should or could be prepared and submitted on a non-staggered and much shorter schedule than that set forth in 10 CFR § 2.754. That section states that proposed findings should be filed by the Applicant

30 days after the hearing is over and the record is closed, by other parties 40 days after the record is closed, and by the NRC Staff 50 days after the close of the record. Without explanation or justification, LILCO proposes to cut approximately in half (to 25 days) the time available for Intervenors and the Staff to submit findings, apparently believes everyone should submit findings at the same time despite the fact that LILCO has the burden of proof, and then suggests that during the short time it arbitrarily allots to Intervenors and the Staff, those parties should also be participating in ongoing litigation before the NRC. Again, LILCO's proposal defies reality and is supported by no bases.

If this Board were to determine that it is possible to issue a Partial Initial Decision on three emergency planning contentions prior to completion of the hearings on the remaining contentions on related issues, it would be necessary to stop the hearings and set aside a block of at least 55 days for the preparation and submission of proposed findings by all parties pursuant to 10 CFR § 2.754. Presumably, the break in the hearings would have to be even larger, however, in order to allow time for the Board to review the parties' submissions and the evidentiary record, and to prepare a decision.

5. LILCO Mischaracterizes the "Precedent"
in this Proceeding

LILCO's description of the findings schedule on health and safety issues in this proceeding (see Motion at 2, n.1), is misleading. What happened in that phase was the following: hearings were held on all contentions from May 1982 through January 1983, and during four days in April 1983. The hearings on all health and safety contentions except Quality Assurance (QA) and Environmental Qualification (EQ) were held from May to September, 1982; QA hearings ran from approximately September through November, 1982; Operational QA and EQ issues were heard in January, 1983. Findings on issues other than QA and EQ were prepared during a break in the hearings from December 22 to January 10, 1983.^{3/} Findings on those issues were filed by LILCO on January 17, by Suffolk County on January 31, 1983, by the Staff on February 11, 1983, and LILCO's reply findings were filed on February 22, 1983. The QA and EQ findings were prepared during March and April and submitted on March 28 (LILCO), April 7 (County), April 18 (Staff), and April 25 (LILCO's reply). Operational QA was settled and was therefore not briefed. One non-QA issue that had been briefed in January

^{3/} From January 10 to January 25 hearings were held on one specific QA issue and EQ, neither of which were related to the findings filed in January.

was re-opened in March, 1983. That matter was heard during four days in April, 1983 (after the main QA findings were submitted), and supplemental findings on that issue were submitted sequentially by the parties from May 2 through May 24, 1983. A Partial Initial Decision was issued, after all the findings had been submitted on all health and safety issues, on September 21, 1983.

This past history is significant for several reasons in addition to the fact that it does not support LILCO's argument that there is precedent in this proceeding for its suggestion that there be a Partial Initial Decision on only three of the emergency planning contentions. The health and safety issues, like the emergency planning issues, involved a "mountain of transcripts" to use LILCO's words, and complex litigation. Indeed, that litigation involved over a thousand pages of written testimony, 26 weeks of hearings, and 20,000 transcript pages. Nonetheless, the findings were prepared and submitted at the end of the hearing process. The issues were not arbitrarily broken into bits and pieces for purposes of preparing findings in a piece-meal fashion. In addition, the normal time limits and order of filing set forth in 10 CFR § 1.754 were adhered to in scheduling the filing of proposed and reply findings, and a time during which there were no hearings or other proceedings

related to the findings then being prepared was set aside for the preparation of findings. Finally, one Partial Initial Decision was issued on all the issues, after all proposed findings had been submitted. Thus, contrary to LILCO's suggestion, the "precedent" in this proceeding supports the submission of proposed findings on emergency planning issues, upon completion of the hearing on all those issues, followed by the issuance of one Partial Initial Decision on emergency planning issues based on a complete evidentiary record.

C. Conclusion

For the foregoing reasons, the Board should deny LILCO's Motion.

Respectfully submitted,

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Dated: April 23, 1984

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NUCLEAR REGULATORY COMMISSION

Before The Atomic Safety And Licensing Board

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

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

) Docket No. 50-322 (O.L.)
) (Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of Suffolk County Response to LILCO's Motion to Set Deadline for Submission of New Contentions Relating to RAC Review and Suffolk County Memorandum in Opposition to LILCO Motion to Set Schedule for Partial Initial Decision on "Group I" Emergency Planning Issues have been served on the following by U.S. Mail, first class, except where noted, this 23rd day of April, 1984.

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