

LILCO, April 26, 1984

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322-OL-3  
 ) (Emergency Planning  
(Shoreham Nuclear Power Station, ) Proceeding)  
Unit 1) )

SUPPLEMENTAL TESTIMONY  
OF JAY R. KESSLER ON BEHALF OF  
THE LONG ISLAND LIGHTING COMPANY  
ON CONTENTION 11 (CONFLICT OF INTEREST)

PURPOSE

This testimony is given by Mr. Kessler, one of the LILCO officers who is designated to fill the command-and-control position, Director of Local Response. He replaces the former LILCO witness, Mr. Wofford, who has retired. The testimony gives Mr. Kessler's opinion, based on his experience, that the LILCO employees in the command-and-control position would not let LILCO's corporate interests interfere with protecting the public.

Attachment - Biographical Information  
on Jay Richard Kessler

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PDR ADOCK 05000322  
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THE LONG ISLAND LIGHTING COMPANY  
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1. Q. Please state your name and business address.  
  
A. My name is Jay R. Kessler; my business address is Long Island Lighting Company, 175 East Old Country Road, Hicksville, New York, 11801.
2. Q. Please give your professional qualifications.  
  
A. My resume is attached to this testimony.
3. Q. Have you read the "LILCO Testimony on Contention 11 (Conflict of Interest)"?  
  
A. Yes.
4. Q. Do you adopt Answer 25 (on pages 19-20 of that testimony) as your own?

A. Yes.

5. Q. Are you one of the people designated to fill the LERO command-and-control position?

A. Yes. I am designated to be Director of Local Response in an emergency. I am one of the people who are alleged to be subject to a "conflict of interest."

6. Q. Do you think you, or other LILCO employees in the command-and-control position, would let LILCO's corporate interests interfere with protecting the public?

A. No. I have been an employee at LILCO for more than 32 years. In that time, I have had numerous assignments which entailed as part of their responsibility the requirement to respond to or participate in emergency activities involving LILCO's electric or gas system. During these assignments, I have had the opportunity to view first-hand the tradition of public service which is a part of the working philosophy of LILCO employees. My experience involves actual hands-on participation in emergency situations where I had to expose myself to dangerous and explosive gaseous atmospheres in order to

evaluate the emergency situation and to prepare to take steps to provide for the public safety. I have also participated for many years in a supervisory role, directing LILCO personnel in these protective actions, and I have never seen a case where a LILCO employee did not do what was required to protect the public.

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CERTIFICATE OF SERVICE

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I hereby certify that copies of LILCO'S MOTION TO WITHDRAW CERTAIN PORTIONS OF ITS TESTIMONY ON CONTENTION 11 (CONFLICT OF INTEREST) AND TO FILE SUPPLEMENTAL TESTIMONY ON THAT CONTENTION and SUPPLEMENTAL TESTIMONY OF JAY R. KESSLER ON BEHALF OF LONG ISLAND LIGHTING COMPANY ON CONTENTION 11 (CONFLICT OF INTEREST) were served this date upon the following by first-class mail, postage prepaid or, as indicated by an asterisk, by Federal Express:

James A. Laurenson,\*  
Chairman  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
East-West Tower, Rm. 402A  
4350 East-West Hwy.  
Bethesda, MD 20814

Dr. Jerry R. Kline\*  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
East-West Tower, Rm. 427  
4350 East-West Hwy.  
Bethesda, MD 20814

Mr. Frederick J. Shon\*  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
East-West Tower, Rm. 430  
4350 East-West Hwy.  
Bethesda, MD 20814

Secretary of the Commission  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

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

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

Bernard M. Bordenick, Esq.\*  
David A. Repka, Esq.  
Edwin J. Reis, Esq.  
U. S. Nuclear Regulatory  
Commission  
7735 Old Georgetown Road  
(to mailroom)  
Bethesda, MD 20814

Eleanor L. Frucci, Esq.\*  
Attorney  
Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory  
Commission  
East-West Tower, North Tower  
4350 East-West Highway  
Bethesda, MD 20814

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

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

Mr. Marc W. Goldsmith  
Energy Research Group  
4001 Totten Pond Road  
Waltham, Massachusetts 02154

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

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

Stewart M. Glass, Esq.\*  
Regional Counsel  
Federal Emergency Management  
Agency  
26 Federal Plaza, Room 1349  
New York, New York 10278

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

Ralph Shapiro, Esq.\*  
Cammer & Shapiro, P.C.  
9 East 40th Street  
New York, New York 10016

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

Jonathan D. Feinberg, Esq.  
New York State Department of  
Public Service, Staff Counsel  
Three Empire State Plaza  
Albany, New York 12223

Spence W. Perry, Esq.  
Associate General Counsel  
Federal Emergency Management  
Agency  
500 C Street, S.W.  
Room 840  
Washington, D.C. 20472

Ms. Nora Bredes  
Executive Coordinator  
Shoreham Opponents' Coalition  
195 East Main Street  
Smithtown, New York 11787

Gerald C. Crotty, Esq.  
Counsel to the Governor  
Executive Chamber  
State Capitol  
Albany, New York 12224

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

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James N. Christman

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

DATED: April 26, 1984