

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED  
USNRC

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In the Matter of \_\_\_\_\_)  
\_\_\_\_\_)  
LONG ISLAND LIGHTING COMPANY \_\_\_\_\_)  
\_\_\_\_\_)  
(Shoreham Nuclear Power Station, \_\_\_\_\_)  
Unit 1) \_\_\_\_\_)  
\_\_\_\_\_)

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

SUFFOLK COUNTY MOTION TO AMEND  
DIRECT TESTIMONY REGARDING  
CONTENTIONS 67 and 24.I

On March 2, 1984 Suffolk County filed direct testimony on Contentions 67 and 24.I, concerning the LILCO Plan's provisions for evacuating people without access to automobiles.<sup>1/</sup> The County's testimony on subpart D of Contention 67 addresses the inadequacy of a number of LILCO's proposed transfer points.<sup>2/</sup> The County's testimony on Contention 24.I concerns LILCO's lack of agreements with transfer point owners. The County's March 2 testimony on both Contentions 67 and 24.I was based on the

<sup>1/</sup> Direct Testimony of Philip B. Herr and Captain Edwin J. Michel on Behalf of Suffolk County Regarding Contentions 67 and 24.I -- Evacuation of Persons Without Access to Automobiles and Lack of Agreements with Transfer Point Owners (March 2, 1984).

<sup>2/</sup> According to the LILCO Plan, "route buses" are used to take members of the public from various subzones of the EPZ to eleven "transfer points" situated in and around the EPZ. At the transfer points the evacuees switch to "transfer buses" which take the evacuees to relocation centers outside the EPZ.

information contained in Revision 3 of the LILCO Plan and other materials made available to the County by LILCO prior to the March 2, 1984 filing deadline.

Subsequent to the County's filing of its testimony on Contentions 67 and 24.I on March 2, 1984, LILCO changed the locations of some of its transfer points. These changes were first revealed to the Board and parties in LILCO's own pre-filed testimony on those contentions, which stated that three of the transfer points identified in Appendix A of the LILCO Plan (the LILCO right of way at Miller Place, the Coram Drive In and the Shirley Drive In) were in the process of being relocated. LILCO's pre-filed testimony mentioned tentative substitute sites for two of the three changed transfer points. However, it was not until April 5, 1984, when LILCO provided the parties with some lease agreements relating to transfer points, that the County was informed that definite substitute sites had been identified. Thus, in the agreements provided by LILCO on April 5, 1984, the County was informed that the three transfer points identified above had been relocated to an A&P Shopping Center in Miller Place, the Coram Plaza Shopping Center and the Shirley Mall Shopping Center. In addition, LILCO provided more precise information regarding the location of the North Patchogue Substation.<sup>3/</sup>

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<sup>3/</sup> The "North Patchogue Substation" is a substation in name only. It has no apparent electrical transmission facilities or LILCO business offices on its premises. Revision 3 of the LILCO Plan  
(footnote continued)

Based on a review of the information and materials provided by LILCO regarding transfer points, subsequent to the filing of the County's March 2 testimony, Suffolk County has amended its testimony on Contentions 67 and 24.I to reflect that new information. An attachment (Attachment 9), which is a photograph showing the property LILCO identifies as the North Patchogue Substation, has also been added.<sup>4/</sup> Attachments 3, 5 and 7 to the March 2 testimony, depicting the LILCO right of way, the Coram Drive In and the Shirley Drive In, respectively, will be withdrawn.

The County hereby moves that the Board permit the County to amend its direct testimony on Contentions 67 and 24.I. The reasons in favor of the County's motion are obvious. Fairness dictates that the County be provided the opportunity to address revisions to LILCO's Plan which are pertinent to the contentions and testimony the County has filed. The changes in its Plan made by LILCO and first revealed to the parties subsequent to the filing of testimony on March 2 have outdated certain of the data on which the County's experts were relying in developing their

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(footnote continued from previous page)  
(Appendix A at IV-74c) identifies the property only as on "Medford Avenue." The additional information provided by LILCO allowed the County to pinpoint the property precisely and inspect it.

<sup>4/</sup> A copy of the County's amended testimony is attached to this motion. The amended portion of the County's testimony extends from page 25 to page 31. For the convenience of the Board and the parties in identifying the County's amended testimony, all additional text has been underscored. Deleted text is indicated by a dashed line.

testimony on LILCO's proposed transfer points. The County should be afforded an opportunity to address those revisions by amending its testimony.

Conclusion

For the above reasons, the County's Motion to Amend Direct Testimony on Contentions 67 and 24.I should be granted.<sup>5/</sup>

Respectfully submitted,

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Dated: April 30, 1984

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<sup>5/</sup> The Board and the parties should also note that Table 7, appearing on page 17 of the County's original pre-filed testimony, contains several typographical errors. Those errors have been corrected in the attached amended testimony.