

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRC

'84 MAR 19 AIO:52

Before the Atomic Safety and Licensing BoardOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))Docket No. 50-322-OL-3
(Emergency Planning)SUFFOLK COUNTY RESPONSE TO LILCO'S MOTIONS TO
STRIKE PORTIONS OF STATE OF NEW YORK TESTIMONY
ON CONTENTIONS 66.D, 67, 73 AND 97.B

On March 9, 1984, LILCO filed three motions to strike portions of the Group II-A direct testimony submitted on behalf of the State of New York concerning Contentions 66.D, 67, 73 and 97.B.^{1/} The State of New York has today responded to LILCO's motions to strike in the following three pleadings:

- o Response of Governor Mario Cuomo, Representing The State of New York, In Opposition to "LILCO's Motion to Strike Portions of William J. Acquario, Et Al's Testimony On Emergency Planning Contention 67"

^{1/} LILCO's Motion To Strike Portions Of The Direct Testimony Of William J. Acquario, Richard D. Albertin, and Robert G. Knighton Regarding Contention 73

Motion to Strike Portions Of Direct Testimony Of Thomas D. Gibbons On Contentions 66.D and 97.B

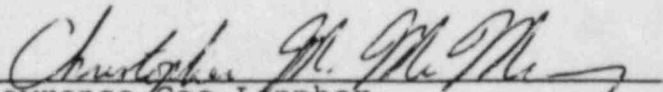
LILCO's Motion To Strike Portions Of William J. Acquario, Et Al's Testimony On Emergency Planning Contention 67.

- o Response of Governor Mario Cuomo, Representing the State of New York, in Opposition to LILCO's "Motion to Strike Portions of Direct Testimony of Thomas D. Gibbons on Contentions 66.D and 97.B"
- o Response of Governor Mario Cuomo, Representing the State of New York, in Opposition to LILCO's "Motion to Strike Portions of the Direct Testimony of William J. Acquario, Richard D. Albertin, and Robert G. Knighton Regarding Contention 73"

As explained in the above-listed Responses by the State of New York, LILCO's motions to strike are without merit. Suffolk County fully endorses the State's Responses and, for the reasons stated therein, urges that this Board deny LILCO's motions to strike.

Respectfully submitted,

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



Lawrence Coe Lanpher
Karla J. Letsche
Christopher M. McMurray
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, NW
Washington, DC 20036

Attorneys for Suffolk County

Dated: March 16, 1984