



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

December 21, 1983

SNRC-1000
Docket No. 50-322
(Emergency Planning)

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBMITTAL OF REVISION 3 PAGES OF LOCAL OFFSITE
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Dear Mr. Denton:

On May 26, 1983, the Shoreham Nuclear Power Station Local Off-site Radiological Emergency Response Plan ("the plan") was submitted as part of the Atomic Safety and Licensing Board Docket No. 50-322.

Please find attached Revision 3 of the above referenced plan. It is requested that you forward this revision to the Federal Emergency Management Agency for review under your Memorandum of Understanding. Attachment 1 is the instructions for inserting the revised pages. We have discontinued the use of colored pages in this revision, and will only be using white pages in any subsequent revisions as well.

Should you have any questions, please contact this office.

Very truly yours,

J. L. Smith
Manager, Special Projects

CAD/jcc

Attachments

cc: Mr. C. Petrone
All Holders of the SNPS Local Offsite
Radiological Emergency Response Plan

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Instructions For Handling Of Revised Pages

The Revision 3 pages should be inserted into the binders in your possession, and the pages that Revision 3 replaces destroyed, in the following manner:

1. Plan Revisions

- a. Replace Table of Contents, List of Effective Pages, 0654 Cross Reference
- b. Replace appropriate pages starting with 2.1-1 ending with 2.1-7.
- c. Delete and destroy page 2.1-8.
- d. Replace appropriate pages starting with Fig. 2.1.1 ending with 3.3-6.
- e. Delete and destroy pages 3.3-7, 3.3-8.
- f. Replace appropriate pages starting with Fig. 3.3.2 ending with Fig. 3.4.1.
- g. Delete and destroy Table 3.4.1 (5 pages).
- h. Replace appropriate pages starting with 3.5-4 ending with Fig. 5.1.1.
- i. Delete and destroy Attachment 5.1.1, replace page 5.4-2, replace pages in Appendix B.

2. Appendix A Revisions

- a. Replace appropriate pages starting with ii ending with IV-178.
- b. Delete and destroy pages IV-179 and IV-180.
- c. Replace pages starting with V-1, ending with V-8a.

3. Offsite Plan Implementing Procedures

- a. Replace appropriate pages starting with OPIP 2.1.1 page 3 of 79, ending with OPIP 5.4.1 page 3 of 11.

ATTACHMENT 1

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December 22, 1983

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Shoreham Offsite Emergency Plan: Revision 3

Gentlemen:

Enclosed is Revision 3 to LILCO's Offsite Emergency Plan for Shoreham Nuclear Power Station, along with the official covering letter, given serial number SNRC-1000. The purposes of this letter are to outline the principal types of changes set forth in it and to indicate additional efforts LILCO will undertake in order to aid the Board and parties in understanding these changes.

The changes fall into 16 areas, each of which is discussed briefly below, along with a listing of pages in the Plan

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16 pp.
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itself, in Appendix A, and in the Implementing Procedures affected by the area of change.^{1/} Three matters related to these changes should be noted. First, the general theory of this Revision was to develop the overall plan rather fully for litigation and for completion of FEMA's RAC review. Thus changes to meet contentions or portions thereof, to respond to the previous FEMA/Argonne Laboratory review, and to respond to circumstances (e.g., unavailability of Suffolk County school facilities for bus transfer points) have been made. Second, these changes are denoted by markings in the right-hand margin: vertical bars denote the addition or replacement of material in Revision 3; horizontal bars denote its deletion in Revision 3.2/ Third, the number of pages included in changes may be misleading as to their aggregate complexity: alteration of even one word on a page requires changing the entire page; numerous pages have only one or a very few lines changed as the result of, e.g., an organizational name change; various changes, while relatively straightforward in themselves, must be propagated through the Plan, Appendix A and Implementing Procedures for consistency, resulting in changes to significant numbers of pages. Changes in organizational names or structures afford one example. Moving the transfer points for bus routes, from Suffolk County schools to other locations, is another, necessitating changes in 92 total pages including 19 maps.

This set of changes is more extensive than had been foreseen at the time of the December 2 Prehearing Conference. The reasons relate largely to LILCO's desire to adapt the plan to updated information, and to make the plan responsive to constructive criticisms in intervenors' contentions and

1/ A relatively small proportion of pages contain changes that arguably relate to more than subject area. In each such case, the page has been listed under the heading to which any change or changes on it primarily relate. Pages intentionally left blank have not been included in this listing.

2/ No effort has been made to edit language of previous revisions except for substance or basic clarity. In a few instances, believed to total a dozen or less, "non-substantive" changes, e.g., to correct spelling of a word or achieve agreement between subject and verb, have apparently been made without addition of a bar in the margin.

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FEMA/Argonne comments on earlier versions. It cannot be stated with absolute certainty that there will never be further modifications to the Plan, Appendix A or Implementing Procedures since LILCO will always want to keep this document as effective a tool as possible, and changes in circumstances may need to be responded to, or criticisms may be able to be addressed in the Plan. However, LILCO does believe that with Revision 3, many of the intervenors' and FEMA's comments on the original Plan have been responded to, and expects that if any further changes are necessary during the course of this litigation it will be possible to make them informally or by way of future commitment, as is typical for Safety Analysis Reports.

What should be the effect of Revision 3 on the schedule for this litigation? LILCO does not believe that there need be any. Those portions which relate to "Group I" issues are largely those contained in Category 10 -- Traffic Analysis, above. The changes in that category are further described in Attachment 1 hereto. Other than implementation of various commitments or statements made by LILCO witnesses at the hearings during the last two weeks,^{3/} the rest of the changes relate to Group II issues, to FEMA/Argonne criticisms, and (in minor degree) to miscellaneous LERO organizational and other improvements based on knowledge derived from drills thus far. Thus the vast majority of changes in Revision 3 relate to issues on which testimony is not due to be filed until February 8, still over six weeks away.

LILCO has also taken, or will take, the following steps in addition to this letter in order to acquaint the parties with the contents of Revision 3.

1. LILCO will hold a meeting on January 4, 1984, beginning at 9:30 a.m., to describe the contents of Revision 3 in more detail and answer questions on it. LILCO's preliminary preference is to hold the meeting at 175 Old Country Road, Hicksville. If there is significant interest in the meeting's

^{3/} Certain restricted portions of the changes implement statements or commitments made by LILCO witnesses at the hearings during the past two weeks with respect to EBS messages and public information, training of LERO and school personnel, and agreements concerning EBS stations and helicopter facilities. Each of these also relates forward to a "Group II" contention.

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being held in Washington, D.C. for the convenience of the parties, LILCO would be willing to move it. I would appreciate hearing from anyone preferring Washington, D.C. as a location by December 28, 1983. All recipients of this letter are invited to attend. This meeting will be without prejudice to the parties' legitimate discovery on Revision 3, if any is needed, but LILCO certainly hopes to narrow any such areas by this means.

2. LILCO is sending one controlled copy of the Emergency Plan, Appendix A and Implementing Procedures with Revision 3 already inserted directly to each RAC member.

3. LILCO will make available, in addition to this letter and instructions attached to Revision 3, personnel on request as necessary to assist any holder of the Plan in incorporating the Revision 3 changes. The lists of effective pages should enable most holders of the Plan to update them.

The principal areas of change are listed below with as accurate a listing as possible of pages affected by each of them:

1. Organizational Changes:

- A. Staging Areas: Additions to Staff,
Clarification of Chain of Command
- B. Deletion of Position of Sanitary Support
Coordinator
- C. Addition of Industrial Relations Coordinator

Plan Pages Affected: 2.1-1, -3, -4, -5, -6, -7, Fig. 2.1.1 pg. 1-4, Fig. 2.1.2, Fig. 2.2.1, Att. 2.2.1 p. 3, 3.7-2, Fig. 3.7.1, Fig. 4.1.2 pp. 1, 2

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 2.1.1: 3, 4, 7, 14, 17, 18, 19, 29, 30, 35, 37, 38, 38a, 48, 49, 50, 55, 57a, 61, 69a, 71, 72, 73, 74, 76, 77, 78, 79
OPIP 3.3.3: 4, 5, 7, 9, 10, 11
OPIP 3.3.4: 6a
OPIP 3.4.1: 23, 24

-5-
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OPIP 3.6.3: 6a
OPIP 3.7.1: 1, 2
OPIP 4.1.1: 8

2. Communications:

- A. Addition of automated verification system for pager notification
- B. Addition of two radio frequencies in the field; addition of other communications equipment

Plan Pages Affected: Att. 2.2.1 p. 2, 3.3-2, 3.3-3, Fig. 3.3.2, Fig. 3.3.3 pp. 1-3, Fig. 3.3.4 pp. 1-3, Fig. 3.3.5, Fig. 3.3.6 p. 2, 3.4-3, -4, -5, -6, -7, Fig. 3.4.1, 3.5-4, Fig. 4.1.3

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 3.1.1: 1
OPIP 3.3.1: 1, 3, 5
OPIP 3.3.2: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 40, 41, 42, 43
OPIP 3.3.3: 2, 3
OPIP 4.1.1: 12
OPIP 5.3.1: 4, 48, 48a, 57, 59, 69, 71, 81, 82, 83, 85, 86

3. Ingestion Pathway Planning: Implementation of Protective Action Recommendations in this area has been expanded to include details of sampling procedures and food pathway interdiction; previous reliance on New York State has been eliminated.

Plan Pages Affected: 3.6-8

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 3.5.2: 29

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OPIP 3.6.6: 1, 1a, 1b, 1c, 1d, 1e, 1f, 1g, 1h, 1i, 1j,
1k, 1l, 1m, 1n, 1o, 1p, 1q, 1r, 1s, 1t, 2-6,
17, 18, 18a, 19, 20, 20a, 21, 50a, 50b

4. Recovery and Re-Entry Planning: Description of implementation has been expanded; reliance on non-LILCO participation has been eliminated.

Plan Pages Affected: 3.10-1, -2

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 2.1.1: 5, 6, 51

OPIP 3.10.1: 1, 2, 3, 3a, 4, 4a, 5, 5a

5. School Protective Actions: The protective action recommendation has been modified to add evacuation and sheltering options.

Plan Pages Affected: 3.6-7

Appendix A Pages Affected: II-10, -10A, -19 to -21, IV-169 to -171

Procedures Pages Affected:

OPIP 3.6.1: 3, 31a

OPIP 3.6.5: 10a, 11, 11a, 12, 18, 18a, 18b, 19, 19a, 19b,
19c

6. Hospital Protective Actions: Modification to emphasize sheltering as the primary protective action; provision for contingent evacuation; elimination of reliance on Long Island Rail Road.

Plan Pages Affected: 2.2-2, 3.7-1

Appendix A Pages Affected: II-28, IV-172, -173

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Procedures Pages Affected:

OPIP 3.4.1: 21
OPIP 3.6.1: 31b, 32
OPIP 3.6.5: 1, 8, 9, 10, 10a, 16, 16a

7. Nursing Homes: Updating and expansion of facility-specific information; refinement of evacuation transportation requirements and time estimates.

Plan Pages Affected: 2.2-4

Appendix A Pages Affected: II-29, IV-174, -175, -176, -177, -178

Procedures Pages Affected:

OPIP 3.6.5: 17, 17a

8. Handicapped Persons: Updating and expansion of facility-specific information; refinement of evacuation transportation requirements for handicapped persons in institutions or at home; provision for monitoring at reception centers.

Plan Pages Affected: 3.9-5, 4.4-2, 4.4-3, 5.4-2

Appendix A Pages Affected: II-12, 18, IV-1, -166 to -168

Procedures Pages Affected:

OPIP 3.6.5: 2, 3, 4, 5, 6, 7, 15, 15a, 15b
OPIP 3.9.2: 2

9. Notification of Deaf: Modification of procedures to provide for notification of deaf persons at home by personal contact.

Plan Pages Affected: 3.6-7

Appendix A Pages Affected: None

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Procedures Pages Affected:

OPIP 2.1.1: 26, 44
OPIP 3.3.4: 4a, 4b, 5, 6
OPIP 3.6.5: 20, 20a

10. Traffic Analyses: Review of KLD model to ensure logic of all traffic movements analyzed; review of configurations of traffic control points and descriptions of traffic movements in Appendix A for consistency with the model. A more detailed description of these changes, designed to show them in relationship to matters at issue in Contention 65, is also provided in Attachment 1 to this letter.^{4/}

Plan Pages Affected: None

Appendix A Pages Affected: I-1, -2, III-4, -4a, -16, -17, -22-24, -27, -28, -33a, -37, IV-5, -7, -8, -10 to -13, -17, -18, -20 to -69, -69a, -72a to -72-d, -75, -79, -82, -86, -90, -94, -95, -104, -109, -113, -119, -131, -135, -140, -144, -149, -154, -158, -162, V-1, -7, -8, -8a

Procedures Pages Affected:

OPIP 3.6.3: 2, 4, 5, 6, 7, 9, 12, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 35, 36, 37, 38, 39, 40, 41, 41a, 46a, 46b

11. Bus Transfer Points: Changes of bus transfer points to eliminate reliance on access to Suffolk County school properties; corresponding changes to bus route maps, route descriptions, bus requirements, bus schedules; miscellaneous route changes to achieve more consistent coverage.

4/ Modifications to protective action recommendations for schools, hospitals and special facilities, which involve traffic issues in the broadest sense but not the issues relating to automobile evacuation time estimates in Contention 65, are included within their respective areas (see items 5, 6, 7, 8 above) but not here.

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Plan Pages Affected: None

Appendix A Pages Affected: IV-74b to -74x, -76, -80, -83, -87, -91, -98, -105, -110, -115, -120, -126, -132, -137, -141, -146, -151, -155, -159, -163; bus route maps, zones A through S.

Procedures Pages Affected:

OPIP 3.6.4: 13-32, 32a, 33-39

'2. Notification of Special Facilities: Updating of listing of facilities with tone alert radios.

Plan Pages Affected: None

Appendix A Pages Affected: II-14, -16

Procedures Pages Affected:

OPIP 3.4.1: 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 14a, 15, 15a, 16

13. Notification of Public: Refinement of procedures for use of EBS network, sirens, manner of posting notices, other means of public notification; more detail in sample EBS messages and press releases.

Plan Pages Affected: 3.3-4, -5, -6, 3.8-1, -2, -3, -4, -5, -6, App. B-50, -50a, -51, -51a, -52, -52a, -53, -53a, 2.1-6

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 2.1.1: 69
OPIP 3.1.1: 13, 14
OPIP 3.3.4: 1, 2, 3, 4
OPIP 3.4.1: 25
OPIP 3.8.1: 1-23
OPIP 3.8.2: 1-38
OPIP 5.4.1: 1, 2, 3

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14. Training: Revision to provide further detail on current LERO classroom and drill programs; addition of training program for non-LERO personnel; further description of LERO retraining program.

Plan Pages Affected: 5.1-5, -6, -7, -8, Fig. 5.1.1, 5.2-1, -2, -2a, -2b, Fig. 5.2.1

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 5.1.1: 1-10, 10a, 10b, 10c, 10d, 10e, 10f, 10g, 10h, 11, 18a

15. Letters of Agreement: New letters of agreement, amplifications of existing letters.

Plan Pages Affected: App. B-24a, 29a, 29b, 30a, 30b, 35a, 36a, 37a, 38a, 42, 43, 44, 44a, 45, 46, 46a, 46b, 47, 47a, 48, 48a, 49, 49a, 50, 50a, 51, 51a, 52, 52a

Appendix A Pages Affected: None

Procedures Pages Affected: None

16. Miscellaneous: List of Effective Pages, Table of Contents, other administrative changes.

Plan Pages Affected: i-xi, Table 3.6.1

Appendix A Pages Affected: LE 1-4, ii, iii

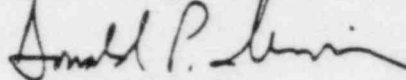
Procedures Pages Affected:

OPIP 2.1.1: 8
OPIP 3.3.1: 2, 4
OPIP 3.3.3: 3a
OPIP 3.6.3: 8
OPIP 5.3.1: 60, 72
OPIP 5.4.1: 2a

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LILCO trusts that this letter, along the measures outlined in it, will assist the Board and parties in making use of Revision 3 in connection with the currently scheduled progress of the hearing.

Respectfully submitted,



Donald P. Irwin
One of Counsel for
Long Island Lighting Company

91/730

Attachment

Enclosures

cc w/attachment and enclosures: Counsel for all Parties
All RAC Members

DESCRIPTION OF MODIFICATIONS TO
AUTOMOBILE EVACUATION PORTIONS OF
APPENDIX A, RELEVANT TO CONTENTION 65

A detailed review of the portions of Appendix A dealing with the modeling of the evacuation of the auto-owning public was conducted to ensure documentation consistency and to address concerns raised by Inspector Roberts, et al. in their testimony on Contention 65. This process encompassed, in order, a review of the base case evacuation of the entire EPZ (Case 12); a review of the tables that document the model inputs and results (Tables IV, VII, X, XI and XII); a review of the traffic control plan (Tables V, VIII, IX and Figure 8) for consistency with the model results; and a review of the evacuation route maps and route descriptions for residents of each zone.

I. Review of Case 12

Three minor revisions were made in the traffic assignments underlying Case 12:

1. People who were previously routed east on the LIE at Edwards Avenue are now routed east on River Road to Osborn Mill Road then north to Route 25 and then east on Route 25. (This model change provides a better description of the physical roadway system and does not significantly change routing assignments or the number of vehicles evacuating along this route).
2. Vehicles moving west on Middle Country Road (Route 25) were preempted from turning north on the William Floyd Parkway. (This change prevented the traffic assignment model from directing approximately 90 cars, over the entire course of evacuation, to move northward on the William Floyd Parkway. The change did not change the destination of these vehicles, nor were any of the zone maps changed as a result of these changes).

3. Removal of a link (125,33) that had routed traffic west on Long Island Avenue between Yaphank Road and Sills Road. A majority of the traffic proceeding south on Yaphank-Middle Island Road is now directed south on Sills Road and then west on the LIE. The remainder travels south on Main Street and Yaphank Road to the Sunrise Highway, where it turns west. (This change was made to eliminate an unnecessary routing of people along Long Island Avenue).

The first two changes were made in response to police concerns; the last was a result of an assessment of all routing assignments.

Following these traffic assignment changes, Case 12 was rerun. The resultant evacuation time estimate was unchanged from the original run.

II. Model Documentation

Tables IV, VI, VII, X, XI and XII were reviewed to ensure that they accurately reflected the results of the revised Case 12 output. As a result of this review, Table VI was unchanged, while the other tables were changed as follows:

Table IV: Pages II-17, -22, -23, -24, -27 and -28 were changed to describe roadway sections more accurately. No roadway capacities were changed from the earlier version of Table IV. Page III-33a was added to report the capacity of some roadway links carrying traffic that were not previously reported.

Table VII: Page IV-17 was changed to identify properly link (91,51) and to remove an outdated indication that Ridge Road was made two lanes southbound.

Table X: This outdated table was changed to reflect the Case 12 input data.

Table XI: Minor changes were made to reflect the Case 12 output data.

Table XII: This table was modified to focus attention on turn movements that will affect evacuating traffic. The changes to Table XII fall into three general categories:

- (i) The vast majority of changes involved the deletion of links that carried no traffic or had no alternative turn movement at the downstream node;
- (ii) Documentation changes were made to clarify the turn movements at an intersection (see, e.g., Node 42, link (87,42); Node 129, link (67,129)), or to reflect turning percentages in the updated Case 12 (see, e.g., Node 14, link (15,14); Node 15, link (83,13)); and
- (iii) A small group of miscellaneous changes were made to reflect the three traffic assignment changes discussed in Item I above (e.g., the deletion of Node 37, link (84,37) and changed descriptions of Node 74, links (128,74) and (75,74)), turn movements not previously identified (Node 110, link (99,110)), and changes designed to be responsive to the testimony of Inspector Roberts, et al. (e.g., Node 2 (node moved from Beacon Drive several blocks west to Woodhull Landing Road)).

Exhibits 1 and 2 to Appendix A were also carefully reviewed; minor changes were made to each.

Exhibit 1: (1) Green nodes 53, 54 and 56 on the western EPZ boundary were removed (these nodes were actually early origin nodes that were removed during the iterative modeling period), (2) origin node 22 was correctly depicted as feeding traffic only onto link (40,109), and (3) internal node 128 was moved to north of the LIE and links (128,75) and (65,76) were depicted to represent more accurately the Edwards Avenue/LIE/River Road area.

Exhibit 2: Two additional desire lines were drawn from origin node 29 to destination nodes 8006 and 8009. (This change was made to provide an accurate representation of the computer input.)

III. Traffic Control Plan

Tables V, VIII and IX and Figure 8 of Appendix A were examined to ensure that the turn movements specified by the DYNEV model were carried out by the traffic control plan. In addition, these tables and figure were modified to reflect useful improvements suggested in the testimony of Inspector Roberts, et al. The changes to these tables and figure are as follows:

Table V: Changes were made to provide better descriptions of the special flow treatments (see, e.g., Nodes 11, 24, 36, 39 and 73); to be responsive to the testimony of Inspector Roberts, et al. (see Nodes 37 and 53); and to delete a special flow treatment proven unnecessary because of light traffic flow (Node 38).

Table VIII: Two one-way flow treatments were removed from Table VIII. Link (7,30) was removed because it had incorrectly been characterized as a one-way flow treatment; it is in fact a channelization treatment that is listed in Table IX. Link (38,40) was removed because a physical survey of the link showed it could accommodate three lanes; thus, it is now a channelization treatment listed in Table IX.

Table IX: Links were deleted from this table because they either had an insufficient amount of traffic flow to warrant channelization treatment (Links (6,12), (23,22), (24,25), (81,24)) or they involved only through movements (Link (53,56)), or they already had turn pockets, which made the creation of turn pockets unnecessary (Links (13,17), (22,21) and (82,17)). Other entries were modified to provide better descriptions of the channelization treatment (Links (42,44), (42,43) and (122,44)). Link (38,40) was added to reflect its change from one-way flow treatment.

Figure 8: The columns describing "Non-evacuation Movements to be Accommodated" were removed to avoid diverting attention from the more important turn movements to be facilitated or discouraged. A statement now appears on page IV-23a that all movements not listed as being facilitated or discouraged are to

be accommodated on a lower priority basis as traffic permits.

Changes to existing control posts were made to provide better descriptions of the location of these posts and of the turn movements to be facilitated or discouraged. Changes in the number of traffic guides assigned to a post and the equipment carried by guides were made to be responsive to the testimony of Inspector Roberts, et al.^{1/}

Finally, seven new control posts were added to Figure 8. Six of these additions (Control Posts 139, 140, 141, 142, 143 and 146) were aimed at addressing police concerns about traffic control at certain intersections and along a one-way stretch of Lower Rocky Point Road/North Country Road. The remaining addition (Control Post 145) was made to provide traffic direction at an intersection having an unusual geometric configuration.

IV. Individual Zone Maps

As a result of this comprehensive review, zones maps for Zones B, F, I and L were revised either to correct earlier depictions (Zones B and F), or to conform route descriptions and zone maps with the model output (Zones I and L).

^{1/} Thirty-six of one hundred thirty-eight existing traffic control points are affected. Two involve changes or corrections to road names. Thirteen specifically respond to SCPD comments respecting the number of traffic guides or equipment to be used at a traffic control point. The remainder involve changes -- generally, additions -- to the lists of turn movements to be facilitated or discouraged at any traffic control point.