

DOCKETED  
USNR

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

APR -2 P12:16

Before the Atomic Safety and Licensing Board

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)

DIRECT TESTIMONY OF NICK J. MUTO AND J. THOMAS SMITH  
ON BEHALF OF SUFFOLK COUNTY REGARDING CONTENTION 15.C

Q. Please state your names and positions.

A. My name is Nick J. Muto. I am the Superintendent of  
the Middle Island Central School District.

My name is J. Thomas Smith. I am the Transportation  
Coordinator of the Middle Island Central School District.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to address Conten-  
tion 15.C.

Q. Do you agree with Contention 15.C?

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A. Yes. We would not trust information or advice provided by LILCO regarding an accident at the Shoreham plant, or what we should do to protect the children under our care. Based upon information already provided by LILCO regarding its proposals for protecting school children, and our general familiarity with LILCO's actions, we believe that any plan developed by LILCO for emergency response by schools would be ineffectual and could not safeguard the school children of our district in the event of a radiological accident at Shoreham. As a result, and in light of our responsibility for the children under our care, we would not make a determination as to what actions were necessary or appropriate to protect the children in the event of a Shoreham accident based solely on information or advice provided by LILCO.

Q. Does that conclude your testimony?

A. Yes.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the following documents have been served on the individuals identified by an asterisk below by U.S. mail, first class, on March 30, 1984, except as otherwise noted.

1. Testimony of Arthur H. Purcell, David J. Olson, Michael Lipsky and Susan C. Saegert Regarding Contentions 11 and 15;

2. Direct Testimony of Dr. George J. Jeffers and Anthony R. Rossi on Behalf of Suffolk County Regarding Contention 15.C;

3. Direct Testimony of Robert W. Petrilak on Behalf of Suffolk County Regarding Contention 15.C.; and

4. Direct Testimony of Nick J. Muto and J. Thomas Smith on Behalf of Suffolk County Regarding Contention 15.C.

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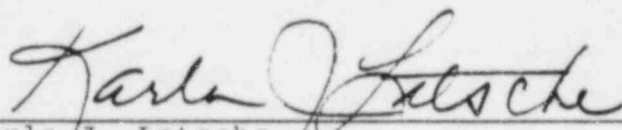
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Dated: March 30, 1984

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# By Hand

## By Federal Express