

411

RELATED CORRESPONDENCE

April 5, 1984

DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
DOCKETING & SERVICEBefore the Atomic Safety and Licensing Board

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

JOINT LILCO/SUFFOLK COUNTY MOTION FOR DEFERRAL OF  
MOTIONS TO STRIKE TESTIMONY ON CONTENTIONS 11 AND 15

One of the witnesses sponsoring LILCO's testimony on Contention 11 (conflict of interest), filed on March 30, 1984, was Andrew Wofford. On the same day the testimony was filed, Mr. Wofford took early retirement from LILCO, effective immediately. Mr. Wofford served as a Director of Local Response in the LILCO Local Emergency Response Organization. LILCO is in the process of determining whether, and if so how, to replace Mr. Wofford's testimony, or whether to delete that portion attributable to him. LILCO expects to arrive at this decision in the near future. In the meantime, LILCO believes that it would be reasonable that motions to strike any portion of LILCO's testimony on Contention 11 be deferred until seven days after the date of service of LILCO's amended testimony to account for Mr. Wofford's retirement.

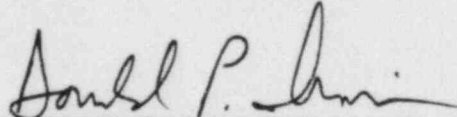
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Suffolk County does not oppose an equal deferral of LILCO's motion to strike any portion of its testimony on Contention 11, so as to preserve symmetry of filings. Since Suffolk County's testimony on Contention 11 is merged in one document with its testimony on Contention 15, this would mean deferral of all motions to strike testimony on Contentions 11 and 15 until seven days after LILCO's amendment to its current testimony on Contention 11.

For the above reasons, LILCO and Suffolk County jointly move for a deferral of the filing date of motions to strike testimony on Contentions 11 and 15 until seven days from the date of service by LILCO of its amended testimony on Contention 11.

Respectfully submitted,



Donald P. Irwin  
Counsel for Long Island  
Lighting Company



Karla J. Letsche  
Counsel for Suffolk County

DATED: April 5, 1984

April 5, 1984

CERTIFICATE OF SERVICE

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

I hereby certify that copies of JOINT LILCO/SUFFOLK COUNTY MOTION FOR DEFERRAL OF MOTIONS TO STRIKE TESTIMONY ON CONTENTIONS 11 AND 15 were served this date upon the following by first-class mail, postage prepaid, and in addition by hand if present at the hearings in Hauppauge (as indicated by an asterisk).

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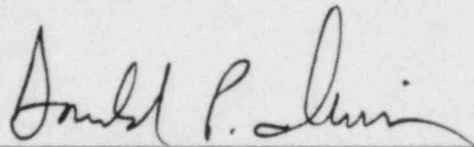
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DATED: April 5, 1984