

LILCO, May 23, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322-OL-4
)	(Low Power)
(Shoreham Nuclear Power Station,)	
Unit 1))	

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
8th Floor.
Washington, D.C. 20008

Counsel for Suffolk County

Long Island Lighting Company (LILCO), by counsel,
requests that Suffolk County produce and permit LILCO to
inspect and copy the following documents in Suffolk County's
possession, custody or control. Such documents should be
produced at the office of Hunton & Williams, 707 East Main
Street, Post Office Box 1535, Richmond, Virginia on or before
June 6, 1984 at 10:00 a.m.

If any documents otherwise responsive to these requests are withheld by the County under a claim of any privilege or not produced for any other reason, the County's response should specify the date, author, all recipients and the subject matter of the document in sufficient detail so that the document may be identified and the claim of privilege evaluated.

1. Resumes of all witnesses whom the County expects to call at the hearings in this proceeding.

2. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of a work plan for comparative assessment of LILCO's power system configuration for use during low power testing as proposed by LILCO with the power system configuration described in LILCO's FSAR for Shoreham.

3. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any comparative assessment of LILCO's power system configuration for use during low power testing as proposed by LILCO with the power system configuration described LILCO's FSAR for Shoreham.

4. All documents reflecting, containing, discussing, concerning, pertaining to, generated as a result of, or supporting any opinion intended to be expressed at the hearings

or in any testimony to be filed in this proceeding by any of the following:

- (a) Robert K. Weatherwax;
- (b) George Dennis Ely;
- (c) Aneesh Bakshi;
- (d) Dr. Christian Meyer;
- (e) Gregory C. Minor;
- (f) Professor Jose M. Roesset;
- (g) Dale Bridenbaugh;
- (h) Richard Hubbard;
- (i) Mohamed M. El-Casseir;
- (j) Stanley Christensen;
- (k) Richard Roberts;
- (l) Phillip McGuire;
- (m) any other consultant or other person whom the County expects to call as a witness at the hearing in this proceeding.

5. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any study, investigation, analysis or report of the (i) reliability, (ii) operation, (iii) general performance, (iv) ability to operate during or after a seismic event of any magnitude, (v) quality assurance, or (vi) procedures for operating any of the following to which reference is made in LILCO's Supplemental Motion and Application for Exemption:

- (a) the GM EMD diesels;
- (b) the 20 MW gas turbine;
- (c) any or all of the gas turbines at Holtsville;
- (d) the gas turbine at Southold;
- (e) the gas turbine at East Hampton;
- (f) the gas turbines at any of LILCO'S major generating stations;
- (g) LILCO'S interconnections with the New York Power Pool or New England Power Exchange;
- (h) LILCO'S transmission lines or related equipment or facilities serving Shoreham either directly or indirectly.

6. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any opinions, analyses, investigations, reports or studies concerning operating procedures or training for operation of any of the power sources described in Request 5 above.

7. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any study, analysis, opinion, report, investigation or calculation concerning LILCO'S ability to restore AC power to Shoreham or the time within which LILCO can restore AC power to Shoreham using any of the power sources described in Request 5 above.

8. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any opinion, study, calculation, report, analysis or investigation concerning or otherwise pertaining to the length of time within which AC power must be restored to Shoreham in the event of any of the accidents or transients included in the Chapter 15 safety analysis in Shoreham's FSAR or for any other accident or transient which the County contends or may contend is relevant in any way to the public health and safety issues to be heard incident to LILCO's Supplemental Motion or Application for Exemption.

9. All notes, correspondence with any person, documents, charts, graphs, drawings, calculations, computer tapes or printouts, and other writings and recordings of any kind generated by or on behalf of any of the following persons in connection with any investigation, report, analysis, study, calculation or opinion concerning any aspect of LILCO's Supplemental Motion for Low Power License or Application for Exemption:

- (a) Robert K. Weatherwax;
- (b) George Dennis Ely;
- (c) Aneesh Bakshi;
- (d) Dr. Christian Meyer;

- (e) Gregory C. Minor;
- (f) Professor Jose M. Roesset;
- (g) Dale Bridenbaugh;
- (h) Richard Hubbard;
- (i) Mohamed M. El-Gasseir;
- (j) Stanley Christensen;
- (k) Richard Roberts;
- (l) Phillip McGuire;
- (m) any other consultant or other person
whom the County expects to call as a witness
at the hearing in this proceeding.

10. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any review, opinion, study or analysis by any employee or consultant of the County concerning the Supplemental Evaluation Report issued (Supplement No. 5) by the NRC Staff for Shoreham.

11. All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any fault-tree analyses for Shoreham during 5% low power testing conditions as proposed by LILCO or any extended risk assessment for Shoreham.

12. Copies of the following reports and analyses authored or co-authored by Robert Weatherwax:

(a) "Comments on Assessment of Accidental Pathways, Subtask D Report (draft), A.D. Little, Inc., dated February, 1978" for Office of Radiation Programs, EPA, July 12, 1978;

(b) "Probabilistic Fission Power Plant Risk Analysis: Its Virtues and Limitations" presented as an invited paper at the American Fiscal Society General Meeting, April, 1975, and published in Bulletin of the Atomic Scientists, September, 1975;

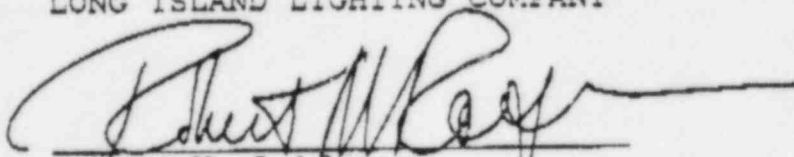
(c) "Probabilistic Risk Analysis of Nuclear Systems, Princeton University Seminar, May, 1975;

(d) "Applications of Multi-Phase Fault Tree Analysis," presented as part of Industry Course entitled RISK ANALYSIS given at Flow Research, Inc., Kent, Washington, February, 1973;

(e) "A Comparison of Fault Tree Quantification Techniques," presented to System Safety Society Symposium, University of Southern California, April, 1972.

13. All reports, studies, investigations, analyses and any other documents reflecting, concerning, containing, discussing, pertaining to the effect of the SSE, were it to occur at or near Shoreham, on the supply of AC power to Shoreham.

LONG ISLAND LIGHTING COMPANY


Robert M. Rolfe
Anthony F. Earley, Jr.

Hunton & Williams
Post Office Box 1535
Richmond, Virginia 23212

DATED: May 23, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'84 MAY 30 A11:55

Before the Commission

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
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)

LONG ISLAND LIGHTING COMPANY)
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(Shoreham Nuclear Power Station,)
Unit 1))
_____)

Docket No. 50-322-OL-4
(Low Power)

CERTIFICATE OF SERVICE

I hereby certify that copies of JOINT SUFFOLK COUNTY AND NEW YORK STATE SUPPLEMENT TO REQUESTS FOR CLARIFICATION OF COMMISSION'S MAY 16 ORDER, dated May ~~30~~, 1984, have been served to the following this ~~30~~th day of May 1984 by U.S. mail, first class, by hand when indicated by two asterisks, and by telecopier when indicated by one asterisk.

Judge Marshall E. Miller, **
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East West Towers (North Tower)
4350 East-West Highway
Bethesda, MD 20814

Judge Glenn O. Bright **
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East West Towers (North Tower)
4350 East-West Highway
Bethesda, MD 20814

Judge Elizabeth B. Johnson ##
Oak Ridge National Laboratory
P.O. Box X, Building 3500
Oak Ridge, Tennessee 37830

The Honorable Peter Cohalan
Suffolk County Executive
County Executive/Legislative
Building
Veterans Memorial Highway
Hauppauge, New York 11788

Edwin J. Reis, Esq. **
Bernard M. Bordenick, Esq.
U.S. Nuclear Regulatory
Commission
Maryland National Bank
Building
7735 Old Georgetown Road
Bethesda, MD 20814
Attn: NRC 1st Floor Mail Room

Fabian Palomino, Esq. *
Special Counsel to the
Governor
Executive Chamber, Room 229
State Capitol
Albany, New York 12224

James Dougherty, Esq.
3045 Porter Street
Washington, DC 20008

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

Jay Dunkleberger, Esq.
New York State Energy
Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

W. Taylor Reveley, III, Esq. *
Anthony F. Early, Jr., Esq.
Robert M. Rolfe, Esq.
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Eleanor L. Frucci, Esq. **
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Nunzio J. Palladino, Chairman **
U.S. Nuclear Regulatory
Commission
Room 1114
1717 H Street, N.W.
Washington, D.C. 20555

Commissioner James K. Asselstine**
U.S. Nuclear Regulatory
Commission
Room 1116
1717 H Street, N.W.
Washington, D.C. 20555

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 2055

Stephen B. Latham, Esq.
John F. Shea, Esq.
Twomey, Latham & Shea
33 West Second Street
Riverhead, New York 11901

Mr. Martin Suubert
c/o Congressman William Carney
1113 Longworth House Office
Building
Washington, DC 20515

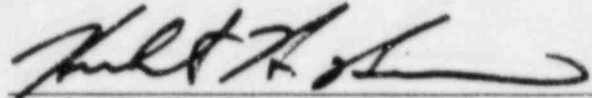
Mr. Brian McCaffrey
Long Island Lighting Company
Shoreham Nuclear Power Station
P.O. Box 618
North Country Road
Wading River, New York 11792

Edward M. Barrett, Esq.
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

Commissioner Victor Gilinsky**
U.S. Nuclear Regulatory
Commission
Room 1103
1717 H Street, N.W.
Washington, D.C. 20555

Commissioner Thomas M. Roberts
U.S. Nuclear Regulatory
Commission
Room 1113
1717 H Street, N.W.
Washington, D.C. 20555

Commissioner Frederick M. Bernthal **
U.S. Nuclear Regulatory
Commission
Room 1156
1717 H Street, N.W.
Washington, D.C. 20555



Herbert H. Brown, Esq.
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, NW, Suite 800
Washington, DC 20036

Dated: May 30, 1984

* By Telecopy
** By Hand
By Federal Express