

LILCO, June 2, 1984

DOCKETED
USNRC

'84 JUN -6 P12:01

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBefore 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))	

APPLICATION FOR SUBPOENAS

Long Island Lighting Company requests the Presiding Officer of this Licensing Board to issue subpoenas pursuant to 10 CFR § 2.720 to command the appearance, testimony and production of documents by the following persons at depositions on the dates and at the locations corresponding to their names:

<u>Deponent</u>	<u>Date/Time/Location</u>	<u>Documents</u>
G. Dennis Eley 117 Bortons Rd. Marlton, NJ 08053	June 8, 1984 11:00 a.m. (EDT) Education Center Shoreham Nuclear Power Station North Country Rd. Wading River, NY	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.

8406070154 840602
PDR ADOCK 05000322
PDR

<u>Deponent</u>	<u>Date/Time/Location</u>	<u>Documents</u>
Aneesh Bakshi 8001 Metropolitan Avenue Thorofare, NJ	June 11, 1984 11:00 a.m. (EDT) Education Center Shoreham Nuclear Power Station North Country Rd. Wading River, NY	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.
Christian Meyer Columbia University Dept. of Civil Engineering & Engineering Mechanics New York, NY	June 12, 1984 9:00 a.m. (EDT) Education Center Shoreham Nuclear Power Station North Country Rd. Wading River, NY	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.
Jose M. Roesset University of Texas School of Engineering Austin, TX	June 13, 1984 9:00 a.m. (EDT) Education Center Shoreham Nuclear Power Station North Country Rd. Wading River, NY	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request

DeponentDate/Time/LocationDocuments

Mohamed
El-Gassier
Sierra Energy &
Risk Assessment,
Inc.
1722 J Street
Suite 19A
Sacramento, CA 95814

June 18, 1984
2:00 p.m. (PDT)
Folger & Levin
100 Green Street
San Francisco, CA 94111

for production
of documents which
is attached as
Exhibit A to the
subpoena.

All documents
not produced by
the County to
LILCO at least
two business days in
advance of the
deposition
responsive to
LILCO's request
for production
of documents which
is attached as
Exhibit A to the
subpoena.

Robert K.
Weatherwax
Sierra Energy &
Risk Assessment,
Inc.
1722 J Street
Suite 19A
Sacramento, CA 95814

June 19, 1984
9:00 a.m. (PDT)
Folger & Levin
100 Green Street
San Francisco, CA 94111

All documents
not produced by
the County to
LILCO at least
two business days in
advance of the
deposition
responsive to
LILCO's request
for production
of documents which
is attached as
Exhibit A to the
subpoena.

<u>Depoent</u>	<u>Date/Time/Location</u>	<u>Documents</u>
Dale Bridenbaugh MHB Technical Assoc. 1723 Hamilton Ave. Suite K San Jose, CA 95125	June 20, 1984 9:00 a.m. (PDT) Folger & Levin 100 Green Street San Francisco, CA 94111	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.
Gregory C. Minor MHB Technical Assoc. 1723 Hamilton Ave. Suite K San Jose, CA 95125	June 21, 1984 9:00 a.m. (PDT) Folger & Levin 100 Green Street San Francisco, CA 94111	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.
Richard Hubbard MHB Technical Assoc. 1723 Hamilton Ave. Suite K San Jose, CA 95125	June 22, 1984 9:00 a.m. (PDT) Folger & Levin 100 Green Street San Francisco, CA 94111	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request

Deponent

Date/Time/Location

Documents

Stanley
Christensen
Dept. of
Engineering
U.S. Merchant
Marine Academy
Kings Point, NY
11024

June 26, 1984
9:00 a.m. (EDT)
Education Center
Shoreham Nuclear
Power Station
North Country Rd.
Wading River, NY

for production
of documents which
is attached as
Exhibit A to the
subpoena.

All documents
not produced by
the County to
LILCO at least
two business days in
advance of the
deposition
responsive to
LILCO's request
for production
of documents which
is attached as
Exhibit A to the
subpoena.

Richard Roberts
Suffolk County
Police Dept.
Yaphank Avenue
Yaphank, NY 11980

June 27, 1984
9:00 a.m. (EDT)
Education Center
Shoreham Nuclear
Power Station
North Country Rd.
Wading River, NY

All documents
not produced by
the County to
LILCO at least
two business days in
advance of the
deposition
responsive to
LILCO's request
for production
of documents which
is attached as
Exhibit A to the
subpoena.

<u>Deponent</u>	<u>Date/Time/Location</u>	<u>Documents</u>
Philip McGuire 32 Thornhedge Rd. Belport, NY	June 28, 1984 9:00 a.m. (EDT) Education Center Shoreham Nuclear Power Station North Country Rd. Wading River, NY	All documents not produced by the County to LILCO at least two business days in advance of the deposition responsive to LILCO's request for production of documents which is attached as Exhibit A to the subpoena.

The depositions of each of these persons, except Messrs. Roberts and McGuire, is expected to produce information relevant to the issues in this proceeding or likely to lead to the discovery of admissible evidence. Each of the deponents has been directly or indirectly identified in the Affidavits of Lawrence Lanpher, Robert Weatherwax, Gregory C. Minor or Dennis Eley, filed in this proceeding by the County on April 24, 1984, as having some role in investigating and preparing opinions with respect to the elements of LILCO's request for a low power license, or was present at Shoreham on May 24, 1984 when three County lawyers and

eight consultants or potential witnesses for the County toured the site. Additionally, the May 31 letter of the County's counsel (Attachment D) confirms that each of the proposed deponents, except Stanley Christensen, is likely to be a witness for the County. Based on correspondence concerning that site visit and the affidavits of April 24, LILCO believes the deponents may have relevant evidence in the following areas, though the depositions are intended to cover any other relevant subjects or subjects within the scope of the opinions intended to be expressed or studies, investigations or analyses undertaken by the deponents:

a) Stanley Christensen: Identified in Affidavit of George Dennis Eley as assisting with investigation of GM EMD diesels' reliability, performance, testing and method of operation;

b) Dennis Eley: Identified in Minor, Lanpher and his own affidavit as investigating matters concerning GM EMD diesel generators reliability, performance, testing and method of operation.

c) Aneesh Bakshi: Present at site tour and believed to be a consultant concerning diesel generators.

d) Christian Meyer: Identified in Minor Affidavit and Meyer's own affidavit as performing seismic and structural work concerning the facilities upon which LILCO will rely in providing AC power to Shoreham.

e) Jose Roeset: Identified in Minor and Meyer Affidavits as performing seismic and structural work concerning the facilities upon which LILCO will rely in providing AC power to Shoreham.

f) Mohamed El-Gassier: Identified in Weatherwax Affidavit as performing analyses of reliability and availability of the AC power systems relied upon by LILCO in its request for low power license.

g) Robert K. Weatherwax: Identified in his own affidavit as performing analyses of reliability and availability of the AC power systems relied upon by LILCO in its request for low power license.

h) Dale Bridenbaugh: Attended March 29 meeting with NRC Staff and is a partner in MHB Technical consultants and, therefore, mentioned in Minor Affidavit as having devoted a large portion of his time since March 20 to review and analysis of LILCO's Supplemental Motion.

i) Gregory Minor: According to his own affidavit, has devoted a large portion of his time since March 20 to review and analysis of LILCO's Supplemental Motion.

j) Richard Hubbard: Partner in MHB and mentioned in Meyer and Minor Affidavits as participating in the review of LILCO's request for low power license.

The depositions of Messrs. Roberts and McGuire, County Police Officers who visited the Shoreham site to view security measures pertinent to LILCO's AC power facilities, are being scheduled because of the County's insistence that security is an issue in this proceeding.^{1/} LILCO does not agree and files

^{1/} See Lanpher to Rolfe letter, May 23, 1983 (Attachment A); Rolfe to Lanpher May 23, 1983 letter (Attachment B).

concurrently with this application a Motion for Protective Order and Motion in Limine to preclude discovery or the introduction of evidence concerning security issues. Nevertheless, if the Board should determine that security is an issue, the depositions of Messrs. Roberts and McGuire will be necessary to assist LILCO in the preparation of its case. For logistical reasons, those depositions must be arranged now contingent upon the ruling on LILCO's Motion for Protective Order and Motion in Limine.

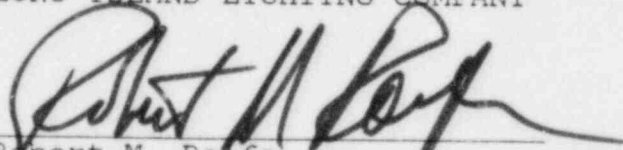
Finally, the need for these subpoenas is created by the County's unwillingness to cooperate with LILCO in the timely scheduling of discovery. By letter of May 23, 1984 (Attachment B), LILCO's counsel advised the County of its intended deponents and asked the County to propose a schedule based on the witnesses' availability. Though a response by May 30 was requested, none was provided by the County. On May 31, LILCO proposed a schedule by letter telecopied to the County's counsel (Attachment C). The County's response received by telecopier later on the afternoon of May 31 (Attachment D) was that "it is premature to be establishing dates for depositions until it is determined whether there even will be a proceeding to consider the LILCO filings." Though the

County promised to consult its witnesses about dates, there is no time to wait for the County's uncertain offer to provide deposition dates at an unspecified time in the future. As the Board stated in its May 31 Order Denying LILCO's Motion for Expedited Responses to Summary Disposition Motions, discovery should have commenced promptly on May 24.

Accordingly, the Board should issue the subpoenas described above and provided with this application.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY



Robert M. Rolfe
Anthony F. Earley, Jr

Hunton & Williams
Post Office Box 1535
Richmond, Virginia 23212

DATED: June 2, 1984

Attachment A

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20006

TELEPHONE: (202) 452-7000

TELEX: 440904 HLPK CJ

4400 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 374-5112

1500 OLIVER STREET
PITTSBURGH, PENNSYLVANIA 15203
(412) 520-6300

May 23, 1984

WITTER'S DIRECT DIAL NUMBER
202/452-7011

(BY TELECOPIER)

Robert Rolfe, Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

Dear Bob:

I talked several times yesterday with Tony Earley regarding a visit to the Shoreham site set for 10:30 a.m. on Thursday, May 24, 1984. When we arrive at the site, we will ask for John Morin. As discussed with Tony, we intend to take pictures and thus request that the appropriate passes be provided.

First, the people who will be on the visit are as follows:

	<u>SS No.</u>
Lawrence Coe Lanpher	223-60-9267
Karla J. Letsche	223-80-0246
John E. Birkenhofer	368-62-4504
Gregory C. Minor	562-48-8919
* Dale G. Bridenbaugh	503-62-5691
Robert Weatherwax	562-62-5691
M. M. El-Gasseir	560-02-2069
Dennis Eley	143-74-7297
Aneesh Bakshi	167-62-3119
Richard Roberts	047-20-6801
* Phillip McGuire	128-26-4889
Christian Meyer	560-82-6618

Those marked with an asterisk are not on the list given to John Morin by Tony. Please note that Dr. Roesset, who was on Tony's list, will not be attending.

I outlined to Tony the areas which we want to visit. Obviously, the primary areas are the power sources and associated components relied upon by LILCO for low power operation, and also the onsite power sources (TDI diesels) that would have been relied upon but for the TDI problems. The specific areas which we can identify in advance are set forth below. I note, however,

ELDERPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

Robert Rolfe, Esq.
May 23, 1984
Page 2

that other areas may also need to be visited once our experts have conferred further. At any rate, the areas already identified are:

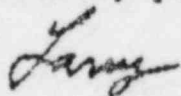
NSS and RSS transformers and associated structures; the 4 BMD mobile diesels and associated components, fuel supplies and cable/conduit to the plant; the 20 MW gas turbine and associated components, fuel supplies, and cable/conduit connecting to the 69 KV circuit; the 138 and 69 KV switchyards; the Wildwood Station; identification of location of buried cables; the 69 KV bypass; the TDI diesels; the emergency and non-emergency switchgear rooms; and the Shoreham control room.

Messrs. Roberts and McGuire, both County Police Officers, will be attending the site visit to assess the security arrangements proposed for low power operation. They will likely need to tour the entire protected area boundary, as well as the locations described above.

Some County personnel also intend to tour the Hicksville Operations Center after the site tour.

The County appreciates Tony's efforts to arrange for this visit.

Sincerely yours,


Lawrence Coe Lanpher

LCL/dk

cc: John Morin
Edmund Reis, Esq.
Fabian Palcmino, Esq.
Steven Latham, Esq.

HUNTON & WILLIAMS

707 EAST MAIN STREET

P.O. Box 1535

RICHMOND, VIRGINIA 23212

TELEPHONE 804-788-8200

TWX-710-956-0061

May 23, 1984

400 PENNSYLVANIA AVENUE, N.W.
P. O. BOX 19230
WASHINGTON, D. C. 20036
TELEPHONE 202-955-1500

333 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071
TELEPHONE 213-617-3052
TELEX 754709

FIRST VIRGINIA BANK TOWER
P. O. BOX 3889
NORFOLK, VIRGINIA 23514
TELEPHONE 804-625-5501
TELEX 755628

299 PARK AVENUE
NEW YORK, NEW YORK 10171
TELEPHONE 212-980-8200
TELEX 754708

88 & T BUILDING P. O. BOX 109
RALEIGH, NORTH CAROLINA 27602
TELEPHONE 919-828-9371

FIRST TENNESSEE BANK BUILDING
P. O. BOX 951
KNOXVILLE, TENNESSEE 37901
TELEPHONE 615-637-4311

FILE NO. 24566.3

DIRECT DIAL NO. 804 788- 8466

By Telecopier

Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
Washington, D.C. 20035

Long Island Lighting Company
Shoreham Nuclear Power Station
Docket No. 50-322-OL-4 (Low Power)

Dear Larry:

This will address several matters concerning discovery incident to LILCO's Supplemental Motion for Low Power Operating License and Application for Exemption.

1. At your request, a visit to the Shoreham site has been arranged for tomorrow, May 24, 1984 at 10:30 a.m. Your letter of May 23 indicates those who will be in attendance from the County. I assume that if any representative of New York State wished to attend, he would have coordinated his request through you.

There are three caveats to LILCO's willingness to provide the site tour. First, inspection of the TDI diesels will not be permitted both because of work going on in the area and because they have no relevance to the health and safety issues in this proceeding. In any event, the County has previously inspected the diesels and their installation. Second, accompanying you will be two County police officers who intend to "assess the security arrangements proposed for low power operation." Their attendance will be permitted, though LILCO does not agree that security issues are relevant or material to any issue before the Licensing Board. LILCO's willingness to afford the police officers the opportunity to see the areas identified in your letter is not to be construed in any way as a waiver of LILCO's position that security issues

HUNTON & WILLIAMS

Lawrence Coe Lanpher, Esq.
Page 2
May 23, 1984

are immaterial and irrelevant. Third, no photographs will be permitted in vital areas or in the normal switchgear room. Also before taking any photographs, the County must sign a nondisclosure agreement and agree that a copy of any photographs taken will be provided LILCO.

2. Enclosed is LILCO's Request for Production of Documents to the County. We request that the documents be produced in Hunton & Williams' Richmond Office no later than June 6, 1984.

3. Between June 7 and June 22, LILCO will depose the following persons:

- (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.

LILCO will also depose during that period any additional consultants retained by the County, but not yet identified. We ask that you identify any such consultants as quickly as possible so that they may be deposed during the anticipated discovery period. Without waiving its objection to the raising of any security issue, LILCO will also depose Officers Roberts and McGuire during this time period if it is determined that security is an issue.

Rather than specify dates for the depositions of particular individuals, we have suggested a range of times to allow you maximum flexibility to arrange the depositions at a

HUNTON & WILLIAMS

Lawrence Coe Lanpher, Esq.

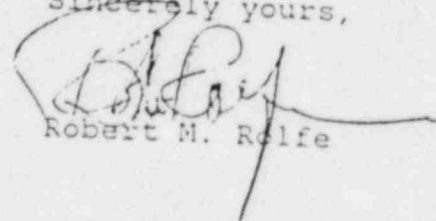
Page 3

May 23, 1984

convenient time for the deponents. Please let us know by May 30, at the latest, suggested dates for these depositions.

I look forward to your prompt response.

Sincerely yours,



Robert M. Rolfe

177/643

Enclosure

cc: Fabian Palomino, Esq.
Edward J. Reis, Esq.

HUNTON & WILLIAMS

707 EAST MAIN STREET P.O. Box 1535

RICHMOND, VIRGINIA 23212

TELEPHONE 804-788-8200

TWX-710-956-0061

2000 PENNSYLVANIA AVENUE, N.W.
P. O. BOX 19230

WASHINGTON, D. C. 20036

TELEPHONE 202-955-1500

333 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071

TELEPHONE 213-617-3052

TELEX 754709

FIRST VIRGINIA BANK TOWER

P. O. BOX 3889

NORFOLK, VIRGINIA 23514

TELEPHONE 804-625-5501

TELEX 755628

299 PARK AVENUE

NEW YORK, NEW YORK 10171

TELEPHONE 212-980-8200

TELEX 754709

B B & T BUILDING P. O. BOX 109

RALEIGH, NORTH CAROLINA 27602

TELEPHONE 919-828-9371

FIRST TENNESSEE BANK BUILDING

P. O. BOX 951

KNOXVILLE, TENNESSEE 37901

TELEPHONE 615-637-4311

FILE NO.

DIRECT DIAL NO. 804 788

May 31, 1984

BY TELECOPIER

Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
8th Floor
Washington, D.C. 20036

Deposition Schedule

Dear Larry:

Bob Rolfe's May 23 letter asked you to propose a schedule for the depositions of your consultants by May 30. Since you have elected not to respond, we are forced to propose our own schedule. Thus, we intend to depose your consultants on the following dates:

June 7	Prof. Stanley Christensen	Long Island
June 8	Dennis Eley	Long Island
June 11	Aneesh Bakshi	Long Island
June 12	Dr. Christian Meyer	Long Island
June 13	Prof. Jose Roesset	Long Island
June 14	Richard Roberts	Long Island
June 15	Philip McGuire	Long Island
June 18	Mohamed El-Gasseir	San Jose or San Francisco
June 19	Robert K. Weatherwax	San Jose or San Francisco
June 20	Dale Bridenbaugh	San Jose or San Francisco
June 21	Gregory Minor	San Jose or San Francisco
June 22	Richard Hubbard	San Jose or San Francisco

HUNTON & WILLIAMS

Please let us know if you do not intend to use any above named individual as a witness in the low power license proceeding. Similarly, we ask that you inform us immediately if you intend to use any other witnesses in the proceeding. We emphasize again that LILCO does not waive its objections to litigating any security matters by scheduling depositions for Messrs. Roberts and McGuire. At this time we simply want to ensure that dates for their depositions are scheduled.

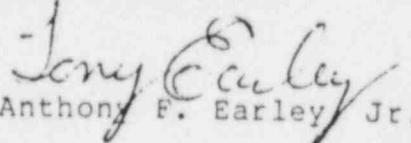
We will make the necessary arrangements for the depositions and give you the exact time and locations for each in the near future. For your planning purposes, Mr. Mohamed El-Gasseir's deposition will start in the afternoon of June 18 and will likely carry over to the 19th. In this regard, we hope to complete each of the other depositions on the day indicated but that may not be possible. Consequently, your consultants should be available on subsequent days in the event that the depositions must be continued.

We are willing to take any of these depositions in Washington so long as all depositions within any particular week are taken there. Travel back and forth between locations in a particular week will not be prudent.

As noted above, we asked you over a week ago to propose a deposition schedule. We suggested a range of times to allow you maximum flexibility to arrange convenient times for the deponents. Your silence has forced us to propose this schedule. If you do not respond to the proposal by the close of business today, we will be forced to subpoena your consultants to ensure that they appear as scheduled.

We look forward to hearing from you.

Sincerely yours,


Anthony F. Earley Jr.

221/765

cc: Fabian G. Palomino, Esq.
Edwin J. Reis, Esq.

Attachment D

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20036

TELEPHONE: (202) 452-1000

TELEX: 430209 RIFE U

1400 TENTH AVENUE
MIAMI, FLORIDA 33139
(305) 574-6139

1500 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 535-0300

May 31, 1984

WRITER'S DIRECT MAIL NUMBER
202/452-7011

(BY TELECOPIER)

Anthony P. Earley, Jr., Esq.
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Dear Tony:

I am in receipt of your letter of May 31, as well as Bob Rolfe's earlier letter of May 23. It is the County's view that there presently is no proceeding pending on LILCO's Low Power Motion or on LILCO's Application for Exemption. The County's position is set forth in the requests it and the State of New York have filed with the Commission for clarification and the motion to strike LILCO's summary disposition motions. Thus, it is premature to be establishing dates for depositions until it is determined whether there even will be a proceeding to consider the LILCO filings.

Nevertheless, we recognize that there may ultimately be a proceeding on LILCO's filings. Thus, last night we sent you discovery requests to which we expect responses if there is a proceeding. In the same vein, we have begun to gather documents responsive to LILCO's May 23 Document Production Requests and have asked our consultants to inform us about dates when they are available to be deposed. As of now, however, I cannot tell you whether the dates you have proposed are possible for our consultants (assuming again that there is a proceeding). Further, assuming a proceeding is held, we cannot determine until a schedule is established whether the dates you proposed are possible for the County's counsel.

Finally, you asked us to identify all witnesses who will testify for the County. We cannot inform you at this time which witnesses we will use in the event there is a proceeding. That depends particularly upon whether the Commission finds LILCO's Application for Exemption to be complete and also on responses which are received to the County's discovery requests. Based on

KIRKPATRICK, LOCKHART, BELL, CHRISTOPHER & PHILLIPS

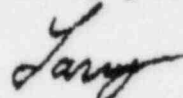
Anthony F. Earley, Jr., Esq.

May 31, 1984

Page 2

LILCO's present filings, it appears likely that the County would use the persons listed in your May 31 letter (except possibly for Stan Christensen), plus additional security consultants and economic consultants.

Sincerely yours,



Lawrence Coe Lanpher

LCL/dk

cc: Edwin J. Reis, Esq.
Fabian G. Palomino

LILCO, June 2, 1984

CERTIFICATE OF SERVICE

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

I hereby certify that copies of APPLICATION FOR SUB-
POENAS were served this date upon the following by Federal Express
as indicated by an asterisk and otherwise by first-class mail,
postage prepaid on June 4, 1984:

Judge Marshall E. Miller*
Chairman
Atomic Safety and Licensing
Board
U.S. NRC
4350 East-West Highway
Fourth Floor (North Tower)
Bethesda, Maryland 20814)

Judge Glenn O. Bright*
Atomic Safety and Licensing
Board
U.S. NRC
4350 East-West Highway
Fourth Floor (North Tower)
Bethesda, Maryland 20814

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

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

Herbert H. Brown, Esq.*
Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W., 8th Floor
Washington, D.C. 20036

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

Eleanor L. Frucci, Esq.*
Atomic Safety and Licensing
Board
4350 East-West Highway
Fourth Floor (North Tower)
Bethesda, Maryland 20814

Edwin J. Reis, Esq.*
U.S. Nuclear Regulatory
Commission
7735 Old Georgetown Road
Bethesda, Maryland 20814
Attn: NRC 1st Floor Mailroom

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, D.C. 20515

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

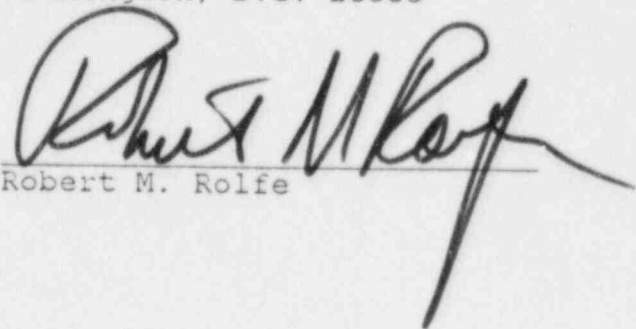
DATED: June 2, 1984

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

James Dougherty, Esq.
3045 Porter Street
Washington, D.C. 20008

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555


Robert M. Rolfe

LILCO, June 2, 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))	

S U B P O E N A

TO: Mohamed El-Gassier
Sierra Energy & Risk Assessment, Inc.
1722 J Street, Suite 19A
Sacramento, California 95814

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 2:00 p.m. (PDT), on June 18, 1984, at Folger & Levin, 100 Green Street, San Francisco, California 94111, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Philip McGuire
32 Thornhedge Road
Belport, New York

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (EDT), on June 28, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Jose M. Roesset
University of Texas
School of Engineering
Austin, Texas

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (EDT), on June 13, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June ___, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Richard Roberts
Suffolk County Police Department
Yaphank Avenue
Yaphank, New York 11980

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (EDT), on June 27, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Robert K. Weatherwax
Sierra Energy & Risk Assessment, Inc.
1722 J Street, Suite 19A
Sacramento, California 95814

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (PDT), on June 19, 1984, at Folger & Levin, 100 Green Street, San Francisco, California 94111, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Christian Meyer
Columbia University
Department of Civil Engineering and
Engineering Mechanics
New York, New York

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (EDT), on June 12, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Richard Hubbard
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose, California 95125

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (PDT), on June 22, 1984, at Folger & Levin, 100 Green Street, San Francisco, California 94111, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Dale Bridenbaugh
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose, California 95125

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (PDT), on June 20, 1984, at Folger & Levin, 100 Green Street, San Francisco, California 94111, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Stanely Christensen
Department of Engineering
U.S. Merchant Marine Academy
Kings Point, New York 11024

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (EDT), on June 26, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June ____, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: Gregory C. Minor
MHB Technical Associates
1723 Hamilton Avenue, Suite K
San Jose, California 95125

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 9:00 a.m. (PDT), on June 21, 1984, at Folger & Levin, 100 Green Street, San Francisco, California 94111, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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-CL-4
)	(Low Power)
(Shoreham Nuclear Power Station,)	
Unit 1))	

S U B P O E N A

TO: Aneesh Bakshi
8001 Metropolitan Avenue
Thorofare, New Jersey

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 11:00 a.m. (EDT), on June 11, 1984, at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

1

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June __, 1984
Bethesda, Maryland

LILCO, June 2, 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))	

S U B P O E N A

TO: G. Dennis Eley
117 Bortons Rd.
Marlton, New Jersey 08053

YOU ARE HEREBY COMMANDED, pursuant to the Atomic Energy Act of 1954, as amended, and Section 2.728 of the Rules of Practice of the Nuclear Regulatory Commission, to appear and testify in deposition in this proceeding at 11:00 a.m. (EDT), on June 8, 1984 at Education Center, Shoreham Nuclear Power Station, North Country Road, Wading River, New York, as requested by Long Island Lighting Company (LILCO) to testify concerning matters pertaining to LILCO's request for a low power license.

You are also commanded to bring with you to the deposition such documents as are in your possession, custody and control responsive to each paragraph of the request for production of documents attached as Exhibit A hereto unless you are aware that any such documents have been produced by Suffolk County to counsel for LILCO at least two business days prior to your deposition as scheduled above.

You are notified that pursuant to Section 2.720(f) of the Rules of the Nuclear Regulatory Commission, you may by motion promptly made and in any event before the time specified for compliance with this Subpoena and upon notice to Robert M. Rolfe or Anthony F. Earley, Jr., Hunton & Williams, Post Office Box 1535, Richmond, Virginia 23212, counsel for LILCO, request that this subpoena be quashed or modified if it is unreasonable or requires evidence not relevant to any matter in issue in this proceeding.

NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING
BOARD

Marshall E. Miller, Chairman
ADMINISTRATIVE JUDGE

Issued: June ___, 1984
Bethesda, Maryland