

DOCKETED  
 UNITED STATES OF AMERICA  
 NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
 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)
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REVISIONS TO THE DIRECT TESTIMONY OF  
 DAVID HARRIS AND MARTIN MAYER ON BEHALF  
 OF SUFFOLK COUNTY REGARDING CONTENTION 75

On May 31, 1984, the Board admitted into evidence the Direct Testimony of David Harris and Martin Mayer on Behalf of Suffolk County Regarding Contentions 24.G, 24.K, 24.P, 73 and 75. Tr. 9574. However, as a result of LILCO's stated intention to abandon its reliance on two relocation centers designated in Revision 3 of the LILCO Plan (Suffolk County Community College and SUNY Stonybrook) and to substitute another facility (Dowling College) in their place and stead, cross-examination on Contention 75, which concerns relocation centers, was held in abeyance pending a decision by the Board on how to proceed. See Tr. 9573-74. On June 8, 1984, the Board ruled that revisions to the County's testimony on Contention 75 (as well as on the other relocation center related issues, Contentions 24.O and 74) must be filed on June 26, 1984. Tr. 10973. Pursuant to the Board's ruling, the County hereby submits the following revisions to the testimony of Drs. Harris and Mayer on Contention 75, which is

contained in the document entitled "Direct Testimony of David Harris and Martin Mayer on Behalf of Suffolk County Regarding Contentions 24.G, 24.K, 24.P, 73 and 75":

1. Pages 24-25. Delete footnote 2.
2. Page 26, line 7. Change "five" to "four."
3. Page 28, lines 12 and 14. Change "Stony Brook" to "Farmingdale."
4. Page 30. Insert the following paragraph following line 7:

"Finally, LILCO cannot assure that it can provide adequate capacity and services for evacuees at its designated relocation centers because at least two of the relocation centers upon which LILCO states it now intends to rely, BOCES II and SUNY Farmingdale (see LILCO Supplemental Testimony at 3), have informed the American Red Cross that those facilities will not be made available to implement the LILCO Plan in the event of a radiological emergency at Shoreham. See Attachments 2 and 3 to this testimony. And, as we stated in our testimony concerning Contention 24.N, the LILCO Plan contains no agreements from facility owners indicating the availability of the other two facilities now apparently relied upon -- that is, St. Joseph's College and Dowling College. Thus, two of the facilities have flatly stated that they are not available for use in implementing the LILCO Plan, and LILCO has failed to provide any assurance or evidence that the other two facilities have agreed to LILCO's proposals for their use. Accordingly, in our opinion, LILCO has failed to provide assurance that the relocation centers it has

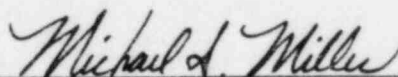
designated will be sufficient in capacity to provide the necessary services for the number of evacuees that will require them in the event of a radiological emergency at Shoreham."

5. Add Attachments 2 and 3 (attached to this pleading).

Respectfully submitted,

Martin Bradley Ashare  
Suffolk County Department of Law  
Veterans Memorial Highway  
Hauppauge, New York 11788

KIRKPATRICK, LOCKHART, HILL,  
CHRISTOPHER & PHILLIPS



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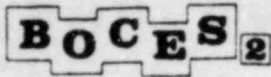
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Attorneys for Suffolk County

Date: June 26, 1984

## BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SECOND SUPERVISORY DISTRICT - SUFFOLK COUNTY, NEW YORK



(516) 289-2200

201 Sunrise Highway, Patchogue, New York 11772  
JAMES HINES, EXECUTIVE OFFICER

June 21, 1984

Mrs. Patricia Nocher  
Executive Director  
American Red Cross  
475 East Main Street  
Patchogue, NY 11772

Dear Mrs. Nocher:

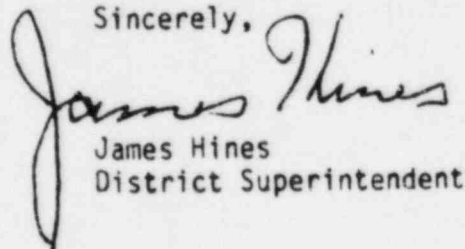
I have recently become aware that the American Red Cross and the Long Island Lighting Company have designated the campus of the BOCES II Occupational Center in Islip as a relocation center in the event of a radiological emergency at the Shoreham Nuclear Power Station.

Please be advised that BOCES II has not entered into any agreement with the American Red Cross or LILCO to serve as a relocation center, or as a decontamination and monitoring facility, for a Shoreham emergency. Any such agreement would have to have been approved by BOCES II, and no such approval has been granted. BOCES II has entered into an agreement with the American Red Cross concerning the use of the BOCES II Occupational Center in Islip as a mass care shelter, but that agreement does not grant the American Red Cross or LILCO permission to use our campus as a relocation center, or as a decontamination and monitoring facility, pursuant to LILCO's proposed plan to deal with a radiological emergency at Shoreham.

In addition, the Governor of the State of New York has determined that the State of New York will not participate in the implementation of the off-site radiological emergency response plan for Shoreham proposed by LILCO. In accordance with the Governor's position, the campus of the BOCES II Occupational Center in Islip will not be available to the American Red Cross or LILCO for use in implementing the LILCO Plan.

Consequently, as District Superintendent and Executive Officer of the Board of Cooperative Educational Services of the Second Supervisory District of Suffolk County, I am advising you that we have not entered into any agreement to serve as a relocation center, or as a decontamination and monitoring facility, in the event of a radiological emergency at Shoreham.

Sincerely,



James Hines  
District Superintendent

JH/tw

**FARMINGDALE**

STATE UNIVERSITY OF NEW YORK • AGRICULTURAL &amp; TECHNICAL COLLEGE • FARMINGDALE, NEW YORK 11735 • 516 420-2145

Office of the President

June 21, 1984

Mrs. Patricia Nocher  
Executive Director  
American Red Cross  
475 East Main Street  
Patchogue, NY 11772

Dear Mrs. Nocher:

I recently have become aware that the American Red Cross and the Long Island Lighting Company have designated the campus of the State University of New York at Farmingdale as a relocation center in the event of a radiological emergency at the Shoreham Nuclear Power Station.

Please be advised that SUNY-Farmingdale has not entered into any agreement with the American Red Cross or LILCO to serve as a relocation center, or as a decontamination and monitoring facility, for a Shoreham emergency. Any such agreement would have to have been approved by me, and no such approval has been granted.

In addition, the Governor of the State of New York has determined that the State of New York will not participate in the implementation of any radiological emergency response plan for Shoreham proposed by LILCO. The Governor has stated that the LILCO Plan is not adequate and is not implementable. In accordance with the Governor's position, SUNY-Farmingdale will not be available to the American Red Cross or LILCO for use in implementing the LILCO Plan.

Consequently, as President of the State University of New York at Farmingdale, I am advising you that we have not entered into any agreement to serve as a relocation center, or as a decontamination and monitoring facility, in the event of a radiological emergency at Shoreham.

Sincerely,

Frank A. Cipriani  
President

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NUCLEAR REGULATORY COMMISSION

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Before The Atomic Safety And Licensing Board

In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station,  
Unit 1)

Docket No. 50-322 O.L.  
(Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of REVISIONS TO THE DIRECT TESTIMONY OF DAVID HARRIS AND MARTIN MAYER ON BEHALF OF SUFFOLK COUNTY REGARDING CONTENTION 75, dated June 26, 1984, have been served to the following this 26 day of June, 1984 by U.S. mail, first class; by hand when indicated by one asterisk; and by Federal Express when indicated by two asterisks.

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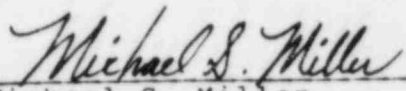
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DATE: June 26, 1984

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\* By Hand  
# By Federal Express