

LILCO, July 3, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

24 JUL-5 P2:07

Before the Atomic Safety and Licensing Board

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

LILCO's MOTION TO ADMIT  
SUPPLEMENTAL TESTIMONY ON  
CONTENTION 85 (RECOVERY AND REENTRY)

LILCO hereby moves to admit the attached "LILCO's Supplemental Testimony on Contention 85 (Recovery and Reentry)" for the reasons stated below.

LILCO's Supplemental Testimony on Contention 85 is limited to a discussion of the methodology for calculating total population dose, as set forth in OPIP 3.10.2, Rev. 4. This newly developed procedure is responsive to a specific comment made by the Regional Assistance Committee of the Federal Emergency Management Agency in its Report dated February 10, 1984. In that Report, FEMA/RAC asserted that LILCO's Emergency Plan did not include a method for calculating total population dose, and thus did not comply with NUREG 0654, II.M.4. See FEMA/RAC Report to the Nuclear Regulatory Commission at 50. This observation was also made in the Testimony of Gregory C. Minor on Behalf of Suffolk County on Contentions 85 and 88, which was filed on March 21, 1984.

add: Gorn  
J. Gorn  
OCA

DS03

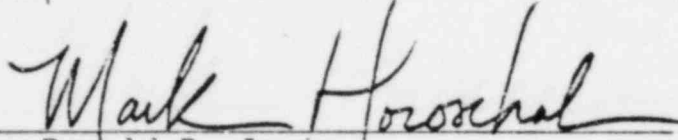
The attached Supplemental Testimony addresses this alleged deficiency in LILCO's general plan for recovery and reentry. Specifically, this testimony delineates the steps to be taken under OPIP 3.10.2 in order to calculate total population exposure. As such, this testimony is directly relevant and material to the central issue of Contention 85, that is, whether LILCO has a general plan for recovery and reentry in accordance with NUREG 0654, II.M.

The Supplemental Testimony which LILCO seeks to file is quite brief. The parties will not be prejudiced if this testimony is admitted because they will have an opportunity to cross-examine LILCO witnesses concerning OPIP 3.10.2, and because the Supplemental Testimony is limited to a discussion of an issue previously raised in the FEMA/RAC Report and Mr. Minor's testimony. Efficiency also commends filing this Supplemental Testimony now rather than as rebuttal after questioning Mr. Minor on his direct testimony; questioning thus can be better focused now than it could have been otherwise.

For the foregoing reasons, LILCO moves that the Board admit LILCO's Supplemental Testimony on Contention 85 (Recovery and Reentry).

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

A handwritten signature in dark ink, reading "Mark Horoschak". The signature is written in a cursive style with a horizontal line underneath it.

Donald P. Irwin  
Mark J. Horoschak

Hunton & Williams  
707 East Main Street  
Post Office Box 1535  
Richmond, Virginia 23212

DATE: July 3, 1984.