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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of  
LONG ISLAND LIGHTING COMPANY  
(Shoreham Nuclear Power Station,  
Unit 1)

DOCKETED  
'84 JUL 31 P2:48  
OFFICE OF THE  
ATTORNEY GENERAL  
BRANCH  
Docket No. 50-322-OL-4  
(Low Power)

RESPONSE OF SUFFOLK COUNTY AND NEW YORK STATE  
TO "LILCO'S MOTION FOR PARTIAL RECONSIDERATION  
OF JULY 18 SECURITY PROCEEDINGS ORDER"

Suffolk County and the State of New York hereby oppose LILCO's Motion for Partial Reconsideration of the July 18 Security Proceedings Order. LILCO has not shown any justification for altering the Board's schedule. The County and State need the time provided by the Board to confer with consultants and to prepare and submit security contentions, particularly given the July 30 commencement of hearing on other low power issues and the overlap of several personnel involved in both matters. In addition, because the County and State have been prevented from conducting discovery on security issues during the other low power discovery period, the time provided in the Board's order for such discovery is necessary.

Finally, the statements and inferences concerning the County's and State's ability to file contentions and such which are drawn by LILCO in its Motion are without any foundation

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or factual basis. The plain fact is that LILCO has made a new proposal for operation of Shoreham, and the County and State require the time provided by the Board in order to be able to deal with the security implications of that proposal. Accordingly, there is no need for reconsideration of the Board's July 18 order, and LILCO has failed to demonstrate any basis for its Motion. The Motion should be denied.

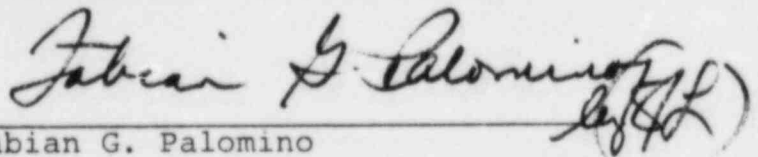
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July 30, 1984

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CERTIFICATE OF SERVICE

I hereby certify that copies of RESPONSE OF SUFFOLK COUNTY AND NEW YORK STATE TO "LILCO'S MOTION FOR PARTIAL RECONSIDERATION OF JULY 18 SECURITY PROCEEDINGS ORDER," dated July 30, 1984 have been sent to the following this 30th day of July, 1984 by U.S. mail, first class and by hand when indicated by one asterisk.

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DATE: July 30, 1984