

51

**KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS**

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20036

1426 BRICKELL AVENUE  
MIAMI, FLORIDA 33131  
(305) 374-8112

TELEPHONE: (202) 452-7000

TELEX: 440209 HIPH UI

DOCKETED  
USNRC

'84 SEP 25 13:06  
1800 OLIVER BUILDING  
PITTSBURGH, PENNSYLVANIA 15222  
(412) 355-6500

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

WRITER'S DIRECT DIAL NUMBER

September 24, 1984

202/452-7011

James A. Laurenson, Chairman  
Dr. Jerry R. Kline  
Mr. Frederick J. Shon  
Administrative Judges  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
4350 East-West Highway  
4th Floor  
Bethesda, Maryland 20814

Re: Long Island Lighting Company;  
Shoreham Nuclear Power Station,  
Unit 1; Docket No. 50-322-OL-3

Dear Administrative Judges:

Enclosed you will find the "Opposition of Suffolk County and the State of New York to LILCO's Motion for Summary Disposition of Contentions 1-10 (the "Legal Authority" Issues)." The affidavit of Richard C. Roberts which is attached thereto has not yet been executed. An executed copy of Mr. Roberts' affidavit will be submitted as soon as possible.

Sincerely yours,

*Lawrence Coe Lanpher*  
Lawrence Coe Lanpher

LCL/dk  
Enclosure

cc: Service List

8409260267 840924  
PDR ADOCK 05000322  
G PDR

DS03

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'84 SEP 25 P3:06

Before the Atomic Safety and Licensing Board

DOCKET OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
)  
)

LONG ISLAND LIGHTING COMPANY )

Docket No. 50-322-OL-3  
(Emergency Planning)

(Shoreham Nuclear Power Station,  
Unit 1) )  
)  
)

CERTIFICATE OF SERVICE

I hereby certify that copies of OPPOSITION OF SUFFOLK COUNTY AND STATE OF NEW YORK TO LILCO'S MOTION FOR SUMMARY DISPOSITION OF CONTENTIONS 1-10 (THE "LEGAL AUTHORITY" ISSUES), dated September 24, 1984, have been served on the following this 24th day of September 1984 by U.S. mail, first class, except as otherwise noted.

James A. Laurenson, Chairman \*  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Edwin J. Reis, Esq.\*  
Bernard M. Bordenick, Esq.  
U.S. Nuclear Regulatory Com.  
Washington, D.C. 20555

Dr. Jerry R. Kline \*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

W. Taylor Reveley, III, Esq.#  
Hunton & Williams  
P.O. Box 1535  
707 East Main Street  
Richmond, Virginia 23212

Mr. Frederick J. Shon \*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Ms. Donna D. Duer\*  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

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

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

Spence Perry, Esq.  
Associate General Counsel  
Federal Emergency Management Agency  
Washington, D.C. 20472

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

Joel Blau, Esq.  
New York Public Service Commission  
The Governor Nelson A. Rockefeller  
Building  
Empire State Plaza  
Albany, New York 12223

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

Atomic Safety and Licensing Board  
Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
1717 H Street, N.W.  
Washington, D.C. 20555

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

Mr. Stuart Diamond  
Business/Financial  
NEW YORK TIMES  
229 W. 43rd Street  
New York, New York 10036

Stephen B. Latham, Esq.  
Twomey, Latham & Shea  
P.O. Box 398  
33 West Second Street  
Riverhead, New York 11901

Ms. Nora Bredes  
Executive Director  
Shoreham Opponents Coalition  
195 East Main Street  
Smithtown, New York 11787

MHB Technical Associates  
1723 Hamilton Avenue  
Suite K  
San Jose, California 95125

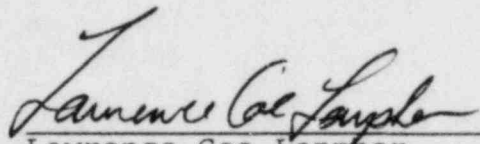
Hon. Peter F. Cohalan  
Suffolk County Executive  
H. Lee Dennison Building  
Veterans Memorial Highway  
Hauppauge, New York 11788

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

Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

Jonathan D. Feinberg, Esq.  
Staff Counsel  
New York State Public  
Service Commission  
3 Rockefeller Plaza  
Albany, New York 12223

Stewart M. Glass, Esq.  
Regional Counsel  
Federal Emergency Management  
Agency  
26 Federal Plaza, Room 1349  
New York, New York 10278

  
Lawrence Coe Langner  
KIRKPATRICK, LOCKHART, HILL,  
CHRISTOPHER & PHILLIPS  
1900 M Street, N.W., Suite 800  
Washington, D.C. 20036

DATE: September 24, 1984

---

\* By Hand  
# By Federal Express