

52.

RELATED CORRESPONDENCE

April 12, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'85 APR 15 11:19

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)

SUFFOLK COUNTY SUPPLEMENT
TO DIRECT TESTIMONY OF LEON CAMPO
REGARDING LILCO'S PROFFERED
EVIDENCE OF JANUARY 11

On February 19, 1985, Suffolk County and the State of New York filed testimony, pursuant to the Board's January 28 Memorandum and Order Granting LILCO's Motion to Reopen Record, concerning LILCO's latest relocation center scheme. Such testimony included the Direct Testimony of Leon Campo on Behalf of Suffolk County Regarding LILCO's Proffered Evidence of January 11 (hereinafter "Campo Testimony"), which consisted of seven pages of testimony and five attachments. In his testimony Mr. Campo stated:

LILCO and the Red Cross have no basis for their claim that there exist agreements that provide assurance that there would be sufficient sheltering capacity for evacuees during a radiological emergency at Shoreham.

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PDR ADOCK 05000322
G PDR

D503

There is certainly no agreement between the East Meadow Union Free School District and LILCO or the Red Cross to provide such shelters, and based on my conversations with other school officials and administrators, I believe that is the case at many or all the other schools and districts relied upon by LILCO and the Red Cross.

Campo Testimony at 7.

Mr. Campo attached to his direct testimony a letter to Frank Rasbury (the Nassau County Red Cross Director whose representations concerning available school facilities are relied upon by LILCO) and one from the Superintendent of the East Meadow School District to Judge Margulies concerning the misrepresentations contained in LILCO's submitted evidence and the actual unavailability of East Meadow facilities. He also attached a list of certain Nassau County school officials and administrators whom Mr. Campo had personally contacted, none of whom had been contacted by LILCO or the Red Cross concerning the use of their school facilities during a Shoreham emergency, and none of whom had agreed to make their facilities available for LILCO's use. Mr. Campo also noted, however, the following:

The number of school officials and administrators contacted by me was necessarily limited by the shortness of time between my learning of the LILCO and Red Cross proposal to use Nassau County school buildings to shelter evacuees during an emergency at Shoreham and the February 19 deadline for filing testimony concerning this proposal. I am continuing my efforts to contact officials and administrators at other school districts, but, at this time, I am aware of no school or district which has entered into any agreement with LILCO or the Red Cross permitting the use of school property to shelter Shoreham evacuees.

Campo Testimony at 6, n.3.

Since February 19, when Mr. Campo's testimony was filed, at least eight additional school districts, whose facilities were represented by LILCO's witnesses as being available for congregate care purposes in the event of a Shoreham emergency, have stated in writing that such representations are false. Attached hereto are copies of such statements. In addition, and also subsequent to February 19, the Superintendent of the East Meadow School District has written a further explanatory letter to Mr. Rasbury concerning the misrepresentations that have been made to this Board with respect to the purported "availability" of his school district's facilities. A copy of that letter is also attached hereto.

Suffolk County hereby supplements the attachments to the Campo Testimony with the attached letters. While it appears that all these documents have been sent to Judge Margulies personally, it is essential that they be made a part of the evidentiary record in this proceeding as well.

This Board cannot ignore the critical facts set forth in these documents. They make clear that the representations made by LILCO's witnesses, Mr. Rasbury and Ms. Robinson, concerning the alleged "availability" of school facilities and, even more significantly, the alleged "agreements" with school districts consenting to the use of their facilities to implement the LILCO Plan, are just plain false. In fact, as school district after school district has plainly stated, no such agreements exist and, indeed, contrary to LILCO's assertions, the facilities will not be made available for LILCO's use.

These documents directly challenge the veracity and credibility of LILCO's witnesses concerning relocation center issues. In addition, they clearly reveal that LILCO's latest relocation center scheme, like each of its previous ones, cannot in fact be implemented. Accordingly, the attached documents should be included as attachments to the Campo Testimony and admitted into evidence with the other County and State testimony on LILCO's latest relocation center scheme.

Respectfully submitted,

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



Herbert H. Brown
Lawrence Coe Lanpher
Karla J. Letsche
KIRKPATRICK & LOCKHART
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

Attorneys for Suffolk County

4
April 12, 1985

Attachments

- Letter dated February 21, 1985 to Mr. Morton B. Margulies from Garden City Public School.
- Letter dated February 22, 1985 to Frank M. Rasbury from West Hempstead Union Free School District.
- Letter dated February 20, 1985 to Mr. Morton B. Margulies from Oceanside Union Free School District.
- Letter dated February 26, 1985 to Mr. Morton B. Margulies from Lawrence Public Schools.
- Letter dated April 1, 1985 to Mr. Morton B. Margulies from Laurence H. Johnson, Jr.
- Letter dated March 7, 1985 to Mr. Frank M. Rasbury from Seaford Union Free School District.
- Letter dated March 5, 1985 to Honorable Morton B. Margulies from North Merrick Union Free School District.
- Letter dated March 11, 1985 to Mr. Frank M. Rasbury from Farmingdale Public Schools.
- Letter dated April 3, 1985 to Mr. Frank M. Rasbury from East Meadow Union Free School District.

Garden City Public Schools

56 CATHEDRAL AVENUE
GARDEN CITY, NEW YORK 11530

DOCKETED
USMRC

OFFICE OF
SUPERINTENDENT OF SCHOOLS
(516) 264-2004

DOCKET NUMBER
PROG & UTIL FAC... SB-322-SK 3

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

February 21, 1985

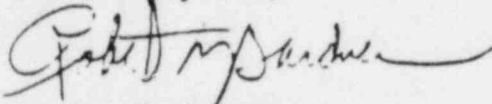
SERVED FEB 27 1985

Mr. Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Judge Margulies:

I am surprised to learn that the American Red Cross and LILCO have designated the Garden City Schools as a relocation center in the event of a radiological emergency at the Shoreham Nuclear Power Station. The Garden City School District 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 the Garden City School District, and no such approval has been given.

Sincerely yours,



Robert M. Gardner
Superintendent of Schools

WEST HEMPSTEAD UNION FREE SCHOOL DISTRICT

ADMINISTRATIVE OFFICES

252 Chestnut Street
West Hempstead, New York 11552

DOCKETED
L3NRG

85 FEB 27 10:03

DR. RICHARD L. VARRIALE
SUPERINTENDENT OF SCHOOLS
516 - 489-8511

DOCKET NUMBER SB-322-α-3
PROD & UTIL. FAC.

OFFICE OF SECRETARY
DOCKETING & SERVICE
S. HAROLD SILVERS
ASSISTANT TO THE SUPERINTENDENT
516 - 489-8511

February 22, 1985

Frank M. Rasbury
Executive Director of Nassau County
Chapter of the American Red Cross
264 Old Country Road
Mineola, NY 11501

SERVED FEB 27 1985

Dear Mr. Rasbury:

I have recently become aware that the American Red Cross and the Long Island Lighting Company have designated West Hempstead High School as a relocation center in the event of a radiological emergency at the Shoreham Nuclear Power Station.

Please be advised that the West Hempstead Union Free School District 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 the West Hempstead Union Free School District, and no such approval has been granted. West Hempstead has permitted the American Red Cross to list West Hempstead High School as a mass care shelter, but that listing does not grant the American Red Cross or LILCO permission to use our high school 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 offsite radiological emergency response plan for Shoreham proposed by LILCO. In accordance with the Governor's position, West Hempstead High School will not be available to the American Red Cross or LILCO for use in implementing the LILCO plan.

Consequently, as Superintendent of Schools and Chief Executive Officer of the West Hempstead Union Free School District, 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,

Richard L. Varriale
Superintendent of Schools

cc: Morton B. Margulies, Adm. Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Oceanside Union Free School District

ADMINISTRATION OFFICE
145 MERLE AVENUE, OCEANSIDE, N. Y. 11572
516 OR 8-1200

BOOKETED
USNAC

85 FEB 27 AM 03

OFFICE OF THE
SUPERINTENDENT

BOOKET NUMBER
PROD & UTIL FAC.....

50-322-06-3

OFFICE OF SECRETARY
BOOKETING & SERVICE
BRANCH

February 20, 1985

Mr. Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

..... SERVED FEB 27 1985

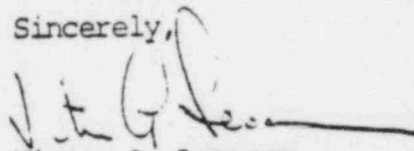
Dear Mr. Margulies:

This is to inform you that, as executive officer of the Oceanside Public Schools, I have not had the opportunity to discuss with, nor gain approval from, the Board of Education regarding the matter of "congregate care centers" for evacuation in a Shoreham nuclear plant emergency.

Accordingly, please be advised that there is no agreement between the Oceanside Schools, the American Red Cross, or Lilco on this matter.

Should either of the two organizations wish to contact us regarding this topic, we shall be pleased to discuss it with them.

Sincerely,



Victor A. Leccese
Superintendent of Schools

VAL:dn

Lawrence Public Schools

Post Office Box 488
Cedarhurst, New York 11516

Telephone
516 295-2700

Alvin J. Baron
Superintendent

Peter B. Lawrence

Michael A. Maina

ACCOUNT NUMBER 50-32204-3
COCKE-UTIL FAC

February 26, 1985

05 MAR-8 49:44

COCKE-
LANC-

SERVED MAR 8 1985

Mr. Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Margulies:

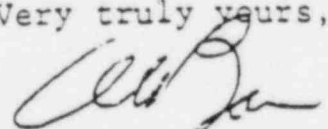
I have recently become aware that the American Red Cross and the Long Island Lighting Company have designated the campus of the Lawrence Junior High School as a relocation center in the event of a radiological emergency at the Shoreham Nuclear Power Station.

Please be advised that the Lawrence Public Schools have 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 us, and no such approval has been granted. The Lawrence School District has entered into an agreement with the American Red Cross concerning the use of the district schools as mass care shelters, but that agreement does not grant the American Red Cross or LILCO permission to use our campuses as relocation centers, or as decontamination and monitoring facilities, 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 campuses of the Lawrence Public Schools will not be available to the American Red Cross or LILCO for use in implementing the LILCO Plan.

As Superintendent of the Lawrence Public Schools, 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.

Very truly yours,


Alvin J. Baron
Superintendent

AJB:JB

c.c. Members of the Board of Education
Mr. Carson

PROG & UTIL FAC. 50-52100-9

**NORTH BELLMORE
UNION FREE SCHOOL DISTRICT**

2616 MARTIN AVENUE
NORTH BELLMORE, NEW YORK 11710
(516) 221-2200

105-A-9 P3:26
C. J. JOSEPH & SONS
BRANCH

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LAURENCE H. JOHNSON, JR.
Superintendent of Schools
ANITA W. FREY
Director of Special Services
DOMINIC J. SAVINO
Business Manager

SERVED APR 9 1985

April 1, 1985

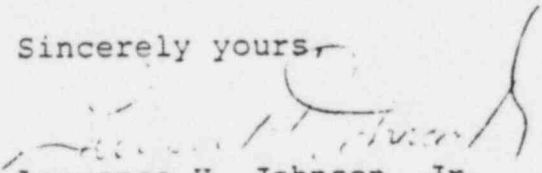
Mr. Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Please be advised that in the event of a radiological accident at the Shoreham Nuclear Plant, the North Bellmore Union Free School District would not make its facilities available as part of a LILCO plan of evacuation.

Many years ago, our district agreed to cooperate in the event of natural disasters. However, we do not consider a Shoreham emergency to be a "natural" disaster; therefore, we would not participate in any evacuation plan that involved the use of our school property.

Sincerely yours,


Laurence H. Johnson, Jr.
Superintendent of Schools

LHJ:eh
cc: Bd. of Ed.

SEAFORD UNION FREE SCHOOL DISTRICT

CENTRAL ADMINISTRATION OFFICES

1600 WASHINGTON AVENUE
SEAFORD, NEW YORK-11783

(516) 783-0710

DWAYNE C. POLL, Ed.D.
SUPERINTENDENT OF SCHOOLS

'85 APR -5 P3:26

DOCKETING SEAFORD
BRANCH

March 7, 1985

SERVED APR 9 1985

Mr. Frank M. Rasbury, Executive Director
Nassau County Chapter of the American Red Cross
264 Old Country Road
Mineola, NY 11501

Dear Mr. Rasbury:

Recently I received a copy of your July 25, 1984, letter to Mrs. Elaine C. Robinson of the Long Island Lighting Company. In that letter you outlined an agreement between the Nassau County Chapter of the American Red Cross and Lilco for the use of certain public school buildings in Nassau County as evacuation centers in case of an emergency at the Shoreham Nuclear Power Station.

Furthermore, in that letter you indicate to Lilco that there is in existence an agreement between the Nassau County Chapter of the American Red Cross and the schools of the Seaford Union Free School District to use our facilities for shelter during an emergency. This comment was made based on a shelter information listing in 1982-83 which you attached to your letter to Mrs. Robinson.

At the time of that 1982-83 agreement, the Seaford Public Schools were not informed that you would wish to use our facilities in case of a nuclear accident. Please be advised that our Board of Education takes exception to your letter to Mrs. Robinson in the strongest possible terms. Unless you are first willing to apply to our Board of Education in writing for the use of our facilities during a nuclear evacuation and have their acceptance response in writing on file in your office, the district will not permit the use of our facilities as part of the Shoreham evacuation plan.

We are completely amazed that you would attempt to take the kind of unilateral action that has been exhibited by the contents of your letter to Lilco. The letter certainly does nothing to maintain cooperative relations between the American Red Cross and the Seaford Public Schools. I trust that you will respond in writing with a request for the use of our buildings if you feel this is essential to the implementation of the Shoreham evacuation plan.

Very truly yours,

Dwayne C. Poll
Dwayne C. Poll
Superintendent of Schools

DCP:BG

cc to Morton Margulis, Administrative Law Judge, Atomic Safety and Licensing
Board Panel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555



NORTH MERRICK

UNION FREE SCHOOL DISTRICT

PROG. & UTIL. FAC.

1775 OLD MILL ROAD
MERRICK, N.Y. 11566

'85 APR -9 P3:25 (6) 379-4070

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Terence E. Smolev, Esq.
Counsel

Fran Einhorn
District Clerk

March 5, 1985

RECREATION & SERVICE
BRANCH

SERVED APR 9 1985

Honorable Morton B. Margulies
Administrative Law Judge
Atomic, Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Honorable Margulies:

I recently became aware that in official testimony before the Nuclear Regulatory Commission, LILCO and the Nassau Chapter of the American Red Cross have committed the North Merrick school facilities, along with 52 other school districts in Nassau County, to a LILCO plan of evacuation in the event of a radiological accident at the Shoreham Nuclear Plant.

The North Merrick School District has not been contacted regarding this matter by either the Red Cross or LILCO.

Please be advised that the North Merrick Union Free School District 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 the North Merrick Board of Education, and no such approval has been granted.

The North Merrick School District did agree to allow the American Red Cross to use school district facilities for a mass care shelter in the event of a natural disaster, but that agreement does not grant the American Red Cross or LILCO permission to use our facilities 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.

I am appalled and outraged at the misrepresentation of the Red Cross and LILCO.

Sincerely,

June N. Irvin
June N. Irvin, Ed.D.
Superintendent of Schools

JNI:ce

FARMINGDALE PUBLIC SCHOOLS

Van Cott and Grant Avenues, Farmingdale, N.Y. 11735

Office of the Superintendent • (516) 752-6510
65 15:26

FRED BROCKMANN
Superintendent of Schools

DOCKET-THIRD SECTOR
BRANCH

March 11, 1985

SERVED APR 9 1985

Mr. Frank M. Rasbury
Executive Director
Nassau County Chapter
American Red Cross
264 Old County Road
Mineola, NY 11501

Dear Mr. Rasbury:

The Farmingdale Board of Education has directed me to communicate our distress to you about the American Red Cross' involvement of the Farmingdale Public Schools in the LILCO plan for evacuation in the event of a radiological accident at the Shoreham Nuclear Plant.

We wish to go on record that we are not participants in this program. I am seriously concerned with the fact that earlier communications from your organization to the Farmingdale Public Schools made absolutely no mention of this new dimension to your needs or plans in this regard.

A letter of October 19, 1984, from Mr. Paul Foley, indicated "Your school could be called on at any time to shelter people during a disaster. The hurricane season is now upon us, so we take this opportunity to ask you to inform your staff, of our disaster shelter program." Your letter implies that you would like to "update your records" and although we have done that in good faith, we do not feel this obligates us at all to the LILCO program.

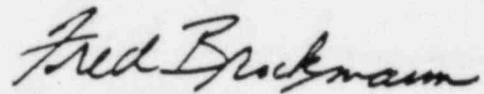
We are seriously concerned about information that we have received that emergency centers in the local plan would carry on decontamination activities.

Please be advised, therefore, that the Farmingdale Public School District has not entered into any agreement with you or LILCO to serve as a relocation center or as a decontamination and monitoring facility for Shoreman emergency. Any such agreement would have to be approved by the Farmingdale Board of Education, and no such approval has been granted.

March 11, 1985

We have entered into an agreement with you to serve as a mass-care shelter, but that agreement does not grant the American Red Cross or LILCO permission to use our buildings as a relocation center, or as a decontamination or monitoring facility, pursuant to LILCO's proposed plan to deal with a radiological emergency at Shoreham.

Sincerely yours,



Fred Brockmann
Superintendent of Schools

/dm

cc: Board of Education

Morton Margulies ✓
Administrative Law Judge
U.S. Nuclear Regulatory Commission

Mr. Howard M. Koenig
Superintendent of Schools
East Meadow U.F.S.D.

75 MAR 15 1985

East Meadow Union Free School District

CARMAN AVENUE, EAST MEADOW, NEW YORK 11554

516-794-7000

OFFICE OF THE SUPERINTENDENT OF SCHOOLS



April 3, 1985

Mr. Frank M. Rasbury, Executive Director
Nassau County Chapter of the American Red Cross
264 Old Country Road
Mineola, New York 11501

Dear Mr. Rasbury:

In your letter of March 11, 1985 you "clarified" the basis of your testimony before the Nuclear Regulatory Commission with respect to the participation of local school districts in an evacuation plan developed, sponsored and implemented by the Lilco Corporation. Unfortunately, your letter failed to address many of the substantive issues which Leon Campo, Executive Assistant for Finance, raised in his letter to you of February 12, 1985.

First of all, your failure to contact school districts with regard to your testimony is inexcusable. School Boards, under the law, not the Red Cross, possess not only the authority, but the responsibility to determine whether or not the public buildings in their charge are to be used as "congregate care centers" during a radiological emergency. Your testimony before the Nuclear Regulatory Commission specifically implied that school buildings would be available for such purposes and you submitted letters of agreement to substantiate this claim.

While your recent letter indicates that your total testimony simply represents your "opinion," this point was obscured by your testimony and that of Lilco which causes reasonable people to conclude that the Red Cross has pledged, by a contract with Lilco, to provide congregate care centers through the use of the public schools of Nassau County.

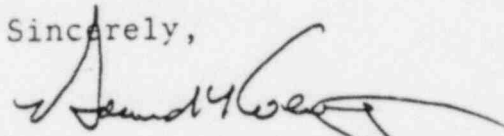
Specifically, question 24 which was directed to you, as well as other representatives of the Lilco Corporation, asked if a "means of relocation would be provided for evacuees from an emergency at Shoreham?" Your response, in conjunction with that of Lilco representatives, was "yes, relocation centers will be available for those who require shelter should there be an emergency at Shoreham." On that matter of fact, as your testimony related to the use of Nassau County school buildings, I believe your testimony was not true.

Furthermore, your references to "emotionalism" and "politics," are totally irrelevant to the issues at hand. You have ignored the fact that Lilco's evacuation program, as it has been presented to the Nuclear Regulatory Commission, is illegal in the State of New York. Certainly, public schools and the Red Cross, in my opinion, may not participate in a program which contradicts the law.

Finally, you did not tell the Nuclear Regulatory Commission that you haven't had contacts with school districts in Nassau County for many years regarding emergency planning for natural disasters and have had absolutely no contact with these school systems regarding a radiological emergency at Shoreham. It is rather imprudent for the Red Cross, working in conjunction with Lilco, to present a program that is untrue regarding use of public school buildings. At the same time, you failed to notify our schools of your intent or your testimony.

Once again, on behalf of East Meadow Schools, I would ask that you remedy your testimony before the Nuclear Regulatory Commission as it relates to public school buildings in Nassau County and, more specifically, as it pertains to the use of East Meadow Schools in any radiological emergency evacuation program.

Sincerely,



Howard M. Koenig, Ph.D.
Superintendent of Schools

HMK:mes

cc: Morton B. Margulies, Administrative Law Judge

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

85 APR 15 11:19

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY SUPPLEMENT TO DIRECT TESTIMONY OF LEON CAMPO REGARDING LILCO'S PROFFERED EVIDENCE OF JANUARY 11, dated April 12, 1985, have been served on the following this 12th day of April, 1985 by U.S. mail, first class.

*Morton B. Margulies, 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

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Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

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New York State Energy Office
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Albany, New York 12223

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Washington, D.C. 20472

Mr. L. F. Britt
Long Island Lighting Company
Shoreham Nuclear Power Station
P.O. Box 628
North Country Road
Wading River, New York 11792

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Albany, New York 12223

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

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

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Washington, D.C. 20008

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Business/Financial
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New York, New York 10036

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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
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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

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Federal Emergency Management
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New York, New York 10278

Mary Gundrum, Esq.
New York State Department of Law
2 World Trade Center, Room 4614
New York, New York 10047


KARLA J. LETSCHE
KIRKPATRICK & LOCKHART
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

DATE: April 12, 1985

- * By Hand
- ** By Federal Express