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Nunzio J. Palladino, Chairman
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Commissioner Thomas M. Roberts
Commissioner Lando W. Zech, Jr.
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Re: Docket No. 50-322-OL-4
Shoreham Nuclear Plant

Dear Members of the Commission:

In accordance with the NRC's April 23 Order, we enclose for filing a Petition for Reconsideration of CLI-85-1 and a brief on the security issues identified in the April 23 Order. Each document is filed jointly on behalf of the State of New York and Suffolk County, who have combined their permitted filings into two consolidated briefs.

The security brief and supporting affidavit enclosed herewith have been treated as safeguards information and thus are being served only on "authorized persons." In fact, on review, we believe that the NRC will conclude that safeguards treatment is not required. However, until the Commission clarifies requirements, we are taking the extra precaution of so treating the data.

The affidavit submitted in support of the security brief has not been executed due to logistical difficulties. Executed copies of the affidavit will be submitted as soon as possible.

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Sincerely yours,

Lawrence Coe Lanpher (M/M)
Lawrence Coe Lanpher

Enclosures

cc: Security brief service list

Note: Security Brief Available in DSB.

DSB