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July 2, 1984

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Gentlemen:

Enclosed is Revision 4 to LILCO's Offsite Emergency Plan for the Shoreham Nuclear Power Station along with the official covering letter, marked as SNRC-1063. The purpose of this letter is to explain the rationale underlying Revision 4 and various associated concepts.

Revision 4 has been designed to respond solely to the comments of the RAC from its review of Revision 3 to the LILCO Transition Plan. Specifically, Revision 4 contains changes that address the 32 inadequacies identified in the RAC's review and the 17 items that were graded adequate by the RAC provided certain revisions were made to the Plan and Procedures. The enclosed matrix provides a detailed roadmap to the changes contained in Revision 4. The matrix includes a breakdown of each RAC comment into its component parts; a description of the changes made to respond to each component part; and finally, a listing of the pages in the Plan, Procedures and Appendix A affected by each change.

In general, the Revision 4 changes add more detail to the Plan and Procedures in response to the RAC review. Most of them

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affect only a small number of pages in the Plan and Procedures. Two changes have, however, a disproportionate effect on the number of pages contained in Revision 4. The first involves a change in the identity of the relocation centers to be used should an evacuation be ordered: Suffolk County Community College and SUNY Stony Brook have been removed as primary relocation centers and have been replaced by SUNY Farmingdale and St. Joseph's College. Implementation of this straightforward change ripples through almost 50 pages in the Plan and Appendix A, involving mechanical conforming changes in the designated relocation centers, evacuation route descriptions (outside the EPZ only) and evacuation route maps for most zones. In addition, various extra-EPZ traffic control posts located near the former relocation centers were either moved or deleted as a result of the identification of two new relocation centers.^{1/}

The second change having a significant effect on the number of pages contained in Revision 4 involves the identification of food processing and related facilities located in New York State within 70 miles of the Shoreham plant. The listing of these facilities in OPIP 3.6.6 requires 93 pages, or approximately 20% of the pages contained in Revision 4.

Two of the changes contained in Revision 4 deserve brief discussion. First, the aggregate capacity of the primary relocation centers is less than that of the previous centers; hence the Plan and Procedures have been revised to place greater emphasis on the utilization of overflow relocation centers. Specifically, the

^{1/} All of the changes to evacuation route descriptions, evacuation route maps and traffic control posts discussed above occur only in areas well beyond the boundary of the EPZ, and have no effect on the substantive content of Appendix A, namely, the evacuation time estimates.

On June 26, 1984, we received a copy of revisions to Suffolk County's testimony on contentions dealing with relocation centers. Attached to that filing were copies of letters from the District Superintendent of the BOCES II Occupational Center and the President of SUNY-Farmingdale informing the American Red Cross that those facilities did not have agreements with the Red Cross to serve as relocation centers in the event an evacuation of the Shoreham EPZ. These letters have come as a complete surprise to LILCO, and given their content, may require further, largely ministerial, changes in the Plan, Procedures and Appendix A. LILCO is currently in the process of evaluating this information, and if changes in the identity of relocation centers are needed, revised pages will be sent to all plan-holders as soon as they are finalized.

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Plan and Procedures were modified to reflect that decontamination will be conducted only at primary relocation centers; that specific decisions as to which evacuees will be sent to overflow relocation centers will rest with the American Red Cross, which operates the relocation centers; and that the only evacuees who will be permitted to go to overflow relocation centers are those who have been found to be uncontaminated. (See Matrix Item No. J.10.h).

Second, a description of the interface between LERO and DOE/RAP teams has been clarified to eliminate potential ambiguities in the Plan and Procedures. Revision 3 of the Plan could have been interpreted as requiring DOE/RAP personnel to report to the EOC and as having LILCO onsite survey teams directly supporting LERO in offsite monitoring. Revision 4 clarifies these relationships by clearly stating that DOE/RAP team members will report to and operate out of Brookhaven National Laboratory, with an alternate DOE/RAP team captain serving as liaison at the EOC in the position of RAP Team Liaison; and that LILCO survey teams will monitor radiation levels as part of the activities of onsite operations and are not directly involved with the LERO effort. (See Matrix Item No. A.3.(5)).

LILCO does not believe the changes in Revision 4 should affect the emergency planning litigation. As noted above, the scope of Revision 4 is limited to concerns identified by the RAC in its review of the LILCO Transition Plan. As such, it primarily adds detail to concepts already contained in the Plan. Thus, existing contentions should not be substantively affected and there should be no need for the filing of new contentions.^{2/}

Enclosed as Attachment 1 to SNRC-1063 are instructions regarding the incorporation of the Revision 4 changes in the Plan that should permit all Plan-holders to insert the new pages in their appropriate locations. It should be noted in incorporating the Revision 4 changes into the Plan that the letters of agreement, which constitute Appendix B to the Plan, have been moved to a separate volume because of their bulk. A list of these agreements has been included in the Plan volume in place of the actual agreements. Because of the bulk of Appendix B and the cost of reproducing this volume, single copies of Appendix B are being provided only to the members of the Board, and to the active participants in the emergency planning proceeding,^{3/} and to

^{2/} To the extent that the relocation center changes and the DOE/RAP team clarifications affect contentions, that effect is limited to contentions that have yet to be litigated (e.g., Contentions 24.0 and 33).

^{3/} NRC Staff, FEMA, Suffolk County and New York State.

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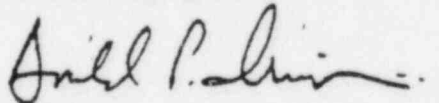
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individuals at the NRC and FEMA charged with reviewing the Plan. Additional copies of Appendix B will be made available to the other parties upon written request. Should anyone have problems with updating the Plan, LILCO will be glad to answer any questions or provide any necessary assistance.

In the interest of time, the current distribution is being sent to the Board and all parties in this proceeding, to the RAC (on behalf of, and at the request of, the NRC Staff), and to limited holders of the Emergency Plan. As subsequent printings permit, copies will be made available to other holders of record of the Emergency Plan.

Sincerely yours,



Donald P. Irwin
Lee B. Zeugin
Counsel for Long Island
Lighting Company

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Enclosures

1. Revision 4 -
2. Matrix, Summary of Responses to Consolidated RAC Review of LILCO Transition Plan for Shoreham
3. SNRC-1063

cc w/enclosures: Counsel for all Parties
All RAC Members (including Consultants):

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LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

June 29, 1984

SNRC-1063

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Submittal of Revision 4: Pages of Local
Offsite Radiological Emergency Response Plan
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Dear Mr. Denton:

On May 26, 1983, the Shoreham Nuclear Power Station Local Offsite Radiological Emergency Response Plan was submitted as part of the Atomic Safety and Licensing Board Docket No. 50-322.

Please find attached Revision 4 pages of the above referenced plan which responds to comments by the Federal Emergency Management Agency (FEMA) Regional Assistance Committee (RAC) report dated March 15, 1984. Attachment I contains the instructions for inserting the revised pages.

We request that you cause a request to be made to FEMA, pursuant to the NRC-FEMA memorandum of Understanding, for review of Revision 4. To this end, we are forwarding, under separate cover, consistent with past practice in the current licensing proceeding and our control copy distribution, a total of fifteen (15) controlled copies of Rev. 4 directly to members of the RAC.

Appendix B to the plan, which provides the written agreements that support the implementation of the plan, is now bound separately. Although included in this submission, Appendix B will receive a limited distribution. It will be on file with LILCO and available upon request to holders of the plan.

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SNRC-1063
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Should you have any questions please contact this office.

Very truly yours,



John D. Leonard, Jr.
Vice President - Nuclear Operations

WFR:jc

Attachments

cc: C. Petrone
Holders of the SNPS Local Offsite Radiological Emergency
Response Plan

ATTACHMENT I

Rev. 4: Insertion Instructions

Plan

1. Replace page for page or add new pages as indicated in list of effective pages.
2. Delete and destroy the following pages:
Page 2.2-5 Rev. 2
Page 1 and 2 of Table 3.9.2 Rev. 0
Page 1 and 2 of Table 3.10.1 Rev. 0
3. Delete and destroy the written agreements in Appendix B. Replace them with the index, page numbers B-i through B-vii, identifying the agreements and their dates. The actual written agreements are contained in Appendix B which has received limited distribution and is available upon written request.

Appendix A

1. Replace page for page or add new pages as indicated in list of effective pages.
2. Note that the Rev. 4 replacement maps are 8 1/2 by 11 inches and black and white instead of the 11 by 17 inch color maps used previously.

Procedures

1. Replace page for page or add new pages as indicated in list of effective pages.
2. Note that in OPIP 3.5.2 page 21 through 51 are replaced by a single page, 20b.
3. Delete and destroy in OPIP 3.6.6 page 50 Rev. 0.
4. You may want to move OPIP 3.5.3 and 3.6.1 from Volume II to Volume I to ease the handling of pages in Volume II.
5. Note that OPIP 3.10.2 is a new procedure and a corresponding tab has been issued.