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LILCO, April 9, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED

Before the Atomic Safety and Licensing Board

APR 11 AM 1:00

In the Matter of )  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322-OL-3  
(Shoreham Nuclear Power Station, ) (Emergency Planning Proceeding)  
Unit 1) )

LILCO'S MOTION TO STRIKE PORTIONS  
OF THE DIRECT TESTIMONY ON BEHALF OF  
SUFFOLK COUNTY REGARDING EMERGENCY PLANNING  
CONTENTIONS 39, 40, 41, 44, 98, 99 AND 100 --  
TRAINING OF OFFSITE EMERGENCY RESPONSE WORKERS

Pursuant to 10 C.F.R. § 2.743(c), the Long Island Lighting Company (LILCO) moves to strike portions of the "Direct Testimony of Deputy Inspector Peter S. Cosgrove, Lt. John L. Fakler and Professor Michael Lipsky in Support of Emergency Planning Contentions 39, 40, 41, 44, 98, 99 and 100 -- Training of Offsite Emergency Response Workers" on the grounds that they are outside the scope of the training contentions which have been admitted and, therefore, that these portions are irrelevant. In all of the testimony detailed below, there is no discernible relation between the testimony and the admitted contentions and in virtually every case, the County makes no effort to establish any relationship. The total absence of relevance to admitted contentions is strikingly evident in the portions of the testimony that attempt to resurrect issues which were raised in contentions rejected by this Board in its Order of March 19, 1984. The fact that the County drafted and moved the admission of these new contentions indicates that the

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County itself did not believe those issues were legitimately raised by its original contentions. The County should not now be permitted to expand the admitted contentions beyond their intended scope to include issues that have been denied admission.

Moreover, the County should not be permitted to rely on the general language of its original contentions to establish the relevance of issues that were raised and rejected in its new contentions. For example, Contention 40 raises the general concern that persons without job-related experience will not be able to perform their LERO jobs in an emergency since LERO training will not compensate for their lack of experience. It does not attempt to identify specific inadequacies in the LERO classroom training and drill and exercise program. In Contentions 99 and 100 the County sought to identify specific inadequacies in the LERO classroom training and drill and exercise program. The alleged inadequacies in the LERO training program identified in Contentions 99 and 100 are distinct from the issues of job-related experience and use of training raised by Contention 40. This Board should not sanction the attempt by Suffolk County to shelter the rejected portions of Contentions 99 and 100 under the umbrella of Contention 40.

The specific portions of the County's testimony which should be stricken and the grounds for striking those portions are set forth below, in the order in which they appear in the County's testimony:

I. Purposes and Conclusions and Contention 98

LILCO moves to strike the phrase in lines 4-5 on page 7 which states "either that those individuals would realize that LILCO has assigned them emergency roles, or" on the ground that it is beyond the scope of the contentions at issue in this testimony and, therefore, is not relevant. Nowhere in the contentions proffered by intervenors is it stated or is the inference raised that individuals who would perform emergency duties under the LILCO Transition Plan would not be aware that they were responsible for performing those emergency duties. For the same reason, the testimony at page 12, lines 14-15, on Contention 98 should be stricken.

II. Contentions 40, 44.E, 44.F, 99 and 100

Suffolk County has chosen to group Contentions 40, 44.E, 44.F, 99 and 100 as a single entity and has then spent 58 pages addressing issues it believes are raised by these contentions. The problem with the County's approach is that it fails to link the testimony with issues raised by specific contentions; in many cases, no linkage is possible since the issues raised are outside the scope of the admitted contentions.

LILCO cannot find any part of the contentions which involves the manner in which LILCO workers were selected for LERO. Accordingly, LILCO moves to strike the phrase on page 18 at lines 6-9 which states "and LILCO workers were selected for LERO in a manner that almost certainly did not identify individuals with relevant

experience, aptitudes or skills" as beyond the scope of the contentions and, therefore, not relevant or material evidence. Similarly, LILCO moves to strike the testimony on page 28, lines 4-19, an answer for which there is no apparent question, on the ground that it, too, deals with LILCO's process for selecting LILCO personnel to serve in LERO.

LILCO moves to strike the footnote on page 19-20 which concerns the ability of traffic guides to direct traffic. This testimony is repetitive and cumulative of testimony on Contention 65, see Testimony of Roberts, et al. on Contention 65 (as amended) at 39-44, see also Board Order of January 23, 1984 at 4 [denying LILCO motion to strike the referenced pages from the Roberts, et al. Testimony, but stating that "we will scrutinize testimony filed for Group II and may strike any testimony that is cumulative with this testimony."].

Beginning with the question at the bottom of page 28, line 20, and continuing through page 32, line 12, Suffolk County's testimony addresses the motivation of LILCO employees in volunteering for the LERO organization and whether or not a proper skill-matching or selection process was engaged in by LILCO when it assigned LILCO employees to specific positions in the LERO organization. All of this testimony is beyond the scope of the contentions and should be stricken as irrelevant.

The testimony beginning on page 32, line 13, and ending on page 33, line 2, contains a number of assertions concerning the

ability of persons to function under pressure. This testimony apparently relates to the ability of individuals to function under stressful situations, an issue which was denied admission by the Board when it struck Contention 100.C. Accordingly, this testimony should be stricken as irrelevant to any issue in this proceeding.

The County's testimony beginning on page 33, line 3, and ending on page 34, line 6, should be stricken in its entirety; the issue of whether or not LILCO attempted to select certain LILCO persons to fill particular LERO jobs or of the adequacy of any selection process which may have been employed by LILCO is beyond the scope of the contentions and, therefore, is not relevant to the issues presented in this proceeding. The fact that all of this testimony relates to LILCO's selection process is highlighted by the phrase in lines 10-12 of the testimony on page 33 which states: "LILCO's inadequate selection process has resulted in at least three adverse consequences." The remainder of that paragraph lists the consequences, all of which, as stated in the County's own testimony, relate to the County's concern with the adequacy of LILCO's selection process.

At page 34, lines 14-15, the County's testimony alleges that there are serious deficiencies in LILCO's classroom and drill programs. These issue were specifically raised by Contention 99.B, which was denied admission. This sentence should be stricken as outside the scope of the contentions and irrelevant.

The County's testimony at page 36, line 21, through page 37, line 2, raises the issue of the ability to develop skills through watching videotapes and the alleged need for hands-on practice and experience. The County specifically alleged in Contention 99.J, which was denied admission by the Board, that the LERO training program did not provide sufficient opportunities for trainees to gain hands-on experience in performing their emergency functions. Rejected Contention 99.B dealt with the adequacy of the videotapes and workbooks used in the LERO training program. An attempt to expand, through testimony, the scope of prior contentions to include the issues raised by Contentions 99.B and 99.J should not be sanctioned, and this portion of the testimony should be stricken as not relevant to the admitted contentions.

The County's testimony on classroom training beginning on page 38, line 20, and ending on page 39, line 9, addresses teaching objectives. The County's contention concerning LERO instructors is 99.C which states:

LILCO's classroom training sessions have been conducted by individuals who were neither experienced in, nor knowledgeable about, the subject areas they are assigned to teach. In addition, the teachers are not experienced or trained in teaching methods.

Nothing in this contention involves teaching objectives or goals for instructors. This testimony should be stricken as beyond the scope of the contentions and, therefore, not relevant to issues in this proceeding.



LILCO also moves to strike the Suffolk County testimony on page 40, lines 5-8, which states "but the LILCO training program does not include such information for instructors. Neither lesson plans nor the other training materials contain references to authority." and the phrase "and because they are given no extra materials except inadequate lesson plans" at page 40, lines 15-16. This testimony seeks to resurrect the issues of the adequacy and substantive content of lesson plans, videotapes, and workbooks; these issues were denied admission by the Board when it denied Contentions 99.A and 99.B. The testimony should be stricken as beyond the scope of the contentions and, therefore, not relevant to issues in this proceeding.

In its Order of March 19, 1984, the Board denied admission to Contention 99.I which stated:

Because training materials had been written for large groups of trainees assigned to several different emergency job categories, trainees receive much general and in many cases irrelevant information rather than sufficiently detailed information concerning their individual job functions.

Suffolk County's testimony beginning at page 43, line 15, ending on page 45, line 16, is a clear attempt to raise issues covered by Contention 99.I. LILCO moves to strike this testimony on the ground that it is irrelevant and immaterial to the issues presented in this proceeding.

Beginning on page 45, line 17, and continuing through page 46, line 17, the County's testimony alleges that the videotapes

used in LILCO's training program contain contradictory and misleading information. This assertion goes directly to the substantive content of the videotapes which was an issue that was expressly rejected by the Board when it denied Contention 99.B in its Order of March 19, 1984. This portion of Suffolk County's testimony should be stricken as not relevant and not material to the issues presented.

In the testimony beginning on page 46, line 18, and continuing through page 49, line 15, Suffolk County alleges that the LILCO training materials frequently downplay the importance of training and the need to retain the material being taught and that this provides little incentive or motivation for LILCO personnel to learn or to retain the emergency training provided to them. Suffolk County relates this testimony to Contention 40 which states, in part, simply that:

Following their training, LILCO personnel will be expected to perform their regular job functions, which have no relation to their emergency roles, rather than applying or using their emergency training. This will minimize any benefits gained through the emergency training, especially since general classroom training, exercises, and almost all drills are only repeated on an annual basis, job-specific classroom training is only repeated on a semi-annual basis, and there are no incentives for LILCO personnel to learn or retain the emergency training provided to them.

A comparison of the language of Contention 40 with the County's testimony demonstrates that while both begin with the premise that there are no incentives for LILCO personnel to retain the



emergency training provided to them, the reasons behind the lack of incentive are markedly different. Contention 40 focuses solely on the frequency with which training will be provided and on the frequency with which LERO personnel will practice their LERO job responsibilities. Absent frequent classroom retraining and drills and exercises, Contention 40 alleges that there will be no incentive for LILCO employees to retain their LERO training. In contrast, the testimony in question addresses what the County considers a downplaying of the importance of the training and the remote likelihood that the training will ever need to be put to use. The County's testimony raises a new and different issue concerning the motivation for LERO workers to retain their training. The testimony appearing on page 40, line 18, through page 49, line 15, should be stricken as not relevant to the issues presented by Contention 40.

Beginning on page 50, line 14, and continuing through page 51, line 12, Suffolk County attempts to resurrect through its testimony the issues rejected by the Board when it denied admission of Contention 99.J concerning tabletop discussions and hands-on experience. Therefore, the testimony should be stricken as not relevant or material.

Beginning on page 51, line 13, and continuing through page 52, line 17, the County makes a similar attempt to reraise the issues covered by rejected Contention 99.E, which stated:

The LILCO training program has no provisions for meaningful and graded testing of LERO personnel following classroom training sessions to determine if the classroom training information was absorbed, correctly understood, or retained by trainees.

The thrust of this portion of the County's testimony is that there should be testing in the classroom training program. This is clearly an issue that was raised by Contention 99.E and therefore, the testimony should be stricken as beyond the scope of the contentions and not relevant.

The County also attempts to revive Contention 99.L in its testimony at page 52, line 18, through page 53. Contention 99.L, alleged that the review exercises attached to the workbooks did not correspond to the learning objectives in the training workbooks. The testimony in question merely restates this concern. This testimony should be denied as beyond the scope of the contentions at issue in this proceeding and, therefore, not relevant. Moreover, as the Board noted in its Order of March 19, 1984, consideration of the correspondence between review exercises and workbooks would require the Board to "delve much more deeply into implementing procedures than is intended by the Commission, as stated in Waterford." Board Order of March 19, 1984, at 17. Accordingly, this testimony should be rejected on the basis of the Waterford decision. See Louisiana Power Light Co. (Waterford Steam Electric Station, Unit 3), ALAB-732, 17 NRC 1076, 1107 (1983).

On page 54, the County's testimony summarizes the testimony on the LERO classroom training program. LILCO moves to strike as irrelevant the following portions of the summary:

1. "because trainees are not tested on classroom training" (lines 9-10) on the ground that the issue of testing was raised in Contention 99.E,
2. "because they are given almost no opportunity to practice the skills they need to develop" (lines 10-11) on the ground that the issue of practicing job-skills in the classroom setting was raised in Contention 99.J,
3. "and because the classroom instructors never evaluate the abilities of trainees to perform their emergency jobs" (lines 11-13) on the ground that it raises the issue of testing in the classroom that was covered by Contention 99.E, and
4. "in fact without testing and evaluation" (lines 15-16) on the ground that it is covered by Contention 99.E.

On page 55, lines 8-21, LILCO moves to strike the County's testimony on the training of rookie policemen on the grounds that it is cumulative and repetitive of the County's testimony on Contention 65, see Testimony of Roberts et al. on Contention 65 (as amended) at 39-44).

On page 56, lines 18 and 19, the County inserts the phrase "and the repeated suggestion that the training will never have to be put to use." As noted above, testimony concerning whether or not the radiological emergency response training provided to LERO workers will have to be put to use and the effect that that notion might have on the motivation of LERO workers is beyond the scope

of Contention 40 and, therefore, should be stricken as not relevant.

LILCO moves to strike the portion of the testimony beginning on page 57, line 1, and ending on page 58, line 12, on the ground that the regulations specifically state that drill and exercise programs do not require public participation. 10 C.F.R. Part 50, Appendix E, IV.F.1 states: "A full-scale exercise which tests as much of the licensee, State, and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted."

LILCO moves to strike a portion of the County's testimony contained within the above objection on an additional ground. The testimony beginning at page 57, line 17, through page 58, line 8, asserts that the LERO drill program is ineffective because it does not provide experience in dealing with members of the public. In its Order of March 19, 1984, the Board specifically rejected Contention 100.E which stated "despite the fact that many LERO workers will have to interact with various officials (e.g., school and special facility administrators) and the public, the LILCO drill program includes no activities involving such interaction." In its ruling the Board stated that the contention was denied on the basis of the Waterford decision. LILCO moves to strike this testimony both on the basis of the Waterford decision, as noted in the Board's Order of March 19, 1984, and on the ground that, because the issue raised by the testimony was covered by Contention

100.E it is outside the scope of the contentions and, therefore, is not relevant.

In addition, LILCO moves to strike the passage on page 57, lines 17-19, which states "according to LILCO, these personnel were selected because they were familiar with driving large vehicles"; as noted above, a selection process or lack thereof is beyond the scope of the admitted contentions and, therefore, is irrelevant.

The portion of the County's testimony beginning at page 60, line 5, and ending on page 62, line 19, speculates that due to a variety of reasons any group of trainees might not learn to perform their jobs properly despite training, that "the key deficiency with LILCO's drills . . . is that they involve far too little realism," and that a multiplicity of events could take place for which the LERO training program does not prepare trainees. The admitted portions of Contention 100, which address the specifics of the LERO drill and exercise program, do not presage this concern. Therefore, the Board should strike all of this testimony as not relevant. The sentence on page 60, lines 13-15, should also be stricken as irrelevant on the ground that the Board specifically rejected Contentions 99.E and 99.F concerning the need for graded testing in the LILCO training program.

At page 63, lines 1-9, the County attempts to resurrect, through testimony, Contention 99.B, which was rejected by the Board in its Order of March 19, 1984. The testimony in question

concerns the substantive adequacy of the videotapes which are part of the LERO training program. This issue was specifically raised and rejected in Contention 99.B, and, therefore, is beyond the scope of the admitted contentions and not relevant.

At page 64, line 3, through page 65, line 10, the County's testimony deals with stress training during the drill and exercise program. As the Board stated in its Order of March 19, 1984, when it rejected Contention 100.C, "there is no regulatory requirement that drill scenarios provide training on how to deal with stress, nor can the Board see any basis for implying such a requirement." Board Order of March 19, 1984, at 18. Suffolk County's improper attempt to revive this issue through its testimony should be stricken.

LILCO moves to strike the portion of the County's testimony beginning on page 65, line 11, ending at page 67, line 10, which concerns the need for LERO workers to be familiar with their field work locations, as beyond the scope of the contentions admitted and, therefore, not relevant. In addition, this testimony is duplicative of testimony on Contention 65, see Testimony of Roberts, et al. on Contention 65 (as amended) at 27 and 39-44; see also Board Order of January 23, 1984, at 4 [denying LILCO motion to strike the referenced pages from the Roberts, et al. Testimony, but stating that "we will scrutinize testimony filed for Group II and may strike any testimony that is cumulative with this testimony."].



LILCO moves to strike the portion of Suffolk County's testimony beginning at page 67, line 11, and ending at page 68, line 4, on the ground that it is beyond the scope of the admitted contentions and, therefore, not relevant to matters at issue in this proceeding. In that portion of the Suffolk County testimony, it is alleged that the drills are not training mechanisms but merely devices for testing portions of the plan. This issue is not raised in Contentions 40, 44.E, 44.F, 99 and 100.

Beginning on page 69 through page 71, Suffolk County summarizes its prior testimony. Consistent with the preceding motions to strike, LILCO moves to strike the following sections of that summary:

1. At page 69, lines 14-18, the Suffolk County testimony states that LILCO's personnel are not experienced in dealing with emergency situations and have no prior experience relevant to their emergency functions in LERO. LILCO moves to strike this testimony on the ground that it apparently raises the issue of whether or not LERO personnel were selected for their LERO jobs through some sort of selection process. Such an issue is not raised by the contentions and, therefore, is not relevant.
2. LILCO moves to strike the phrase "almost exclusively lectures" on page 69 at lines 20-21 on the ground that this issue was raised by Contention 99.K which was denied admission by the Board and is irrelevant.
3. LILCO moves to strike as irrelevant the phrase "with no testing or evaluation," which begins at line 21 on page 69 and carries over to page 70. Contention 99.E, which specifically addressed the lack of a "meaningful and graded testing" in the LERO classroom training program, was denied admission by the Board.

4. The issue of few practical or "hands-on" demonstrations was raised by rejected Contention 99.J. LILCO moves to strike this phrase on the ground that it is not relevant to issues raised by the contentions admitted.
5. The phrase "includes simulated interaction with the public" found at page 70, lines 3-4, and the phrase "subject trainees to stress," at page 70, line 4, were issues specifically raised in Contention 100.E and 100.C, respectively, and were denied admission by the Board. On that basis the phrases should be stricken as irrelevant. In addition, the phrases should be stricken because, as the Board stated in its Order of March 19, 1984, there is no regulatory requirement that drill scenarios provide training on how to deal with stress and also that inquiry into how LERO workers will be trained to interact with officials and with the public is not admissible on the basis of the Waterford decision.

### III. Contentions 41 and 44.D

LILCO moves to strike Suffolk County's testimony beginning on page 72 at line 23 and ending on page 73, line 6, on the ground that the discussion of the impact of stress and anxiety on a radio user is beyond the scope of Contentions 41 and 44.D and, therefore, is not relevant to the issues presented by those contentions.

The portion of Suffolk County's testimony beginning on page 74, line 22, and carrying over to page 75, line 6, concerns the training provided to all emergency workers concerning notification and alleges that the general overview provided does nothing more than cause the attention of trainees to lapse. This issue was specifically raised in Contention 99.I which was rejected by the

Board in its Order of March 19, 1984, and should be stricken as irrelevant.

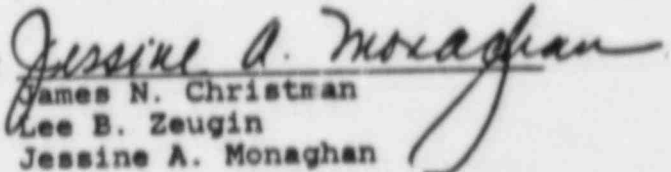
LILCO moves to strike lines 5-8 of page 76 on the grounds that the testimony is beyond the scope of the contentions and, therefore, is not relevant to the issues presented in this proceeding. The testimony alleges that much of the communications-related information provided to trainees is confusing or incorrect. Neither of these issues is raised by Contention 41 or 44.D. In fact, the adequacy of LILCO's videotapes was an issue that was specifically raised in Contention 99.B which was rejected by the Board.

#### IV. Conclusion

For the reasons stated above, LILCO respectfully requests that this Board strike the testimony which is the subject of this Motion.

Respectfully submitted,

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DATED: April 9, 1984

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CERTIFICATE OF SERVICE

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(Shoreham Nuclear Power Station, Unit 1)  
(Emergency Planning Proceeding)  
Docket No. 50-322-07.-3

I certify that copies of LILCO'S MOTION TO STRIKE PORTIONS OF THE DIRECT TESTIMONY ON BEHALF OF SUFFOLK COUNTY REGARDING EMERGENCY PLANNING CONTENTIONS 39, 40, 41, 44, 98, 99 AND 100 -- TRAINING OF OFFSITE EMERGENCY RESPONSE WORKERS were served this date upon the following by first-class mail, postage prepaid, or by hand (as indicated by one asterisk), or by Federal Express (as indicated by two asterisks).

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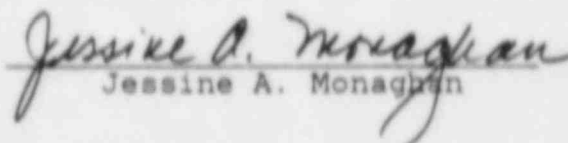
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