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To: Administrative Law Judges Margulies,
Kline, and Shon, and All Other
Recipients of Revision 5 of the
Shoreham Offsite Emergency Plan

SHOREHAM OFFSITE EMERGENCY PLAN: REVISION 5

Gentlemen:

Long Island Lighting Company has sent to you under separate cover Revision 5 to LILCO's Local Offsite Radiological Emergency Response Plan for the Shoreham Nuclear Power Station, along with the submittal letter to the Nuclear Regulatory Commission, which has been given serial number SNRC-1198. The purpose of this letter is to outline the principal changes set forth in Revision 5 of the LILCO Plan.

The changes fall into 11 areas, each of which is discussed briefly below, along with a listing of pages of the Plan itself, Appendix A, and the Implementing Procedures affected by that area of change. As with previous revisions to the Plan, Revision 5 changes are denoted by markings in the right-hand margin: vertical bars denote the addition or replacement of material in Revision 5; horizontal bars denote its deletion in Revision 5. Contrary to the practice with previous revisions to the Plan, LILCO has reproduced for holders of the Plan all pages of the Plan, Appendix A, and Implementing Procedures, not just Revision 5 pages, to alleviate the need for planholders to go through the tedious process of replacing each outdated page in the document with Revision 5 pages. Thus, while the Revision 5 package sent you includes all pages of the Plan, Appendix A, and Implementing Procedures (Revisions 0-5 (not just the Revision 5 pages)), only pages marked "Rev. 5" in the bottom right-hand corner have been changed. Instructions for handling the Revision 5 package are included as Attachment I to SNRC-1198.

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The changes made in Revision 5 are by and large confirmatory or ministerial, in response to the need (1) to complete the requisite annual update of details that routinely change over time, such as addresses, document references, letters of agreement, and the like (see areas 2, 8, 9, 11), (2) to conform the Plan to testimony given by LILCO before the Atomic Safety and Licensing Board, to the Partial Initial Decision issued by that Board, and to commitments to FEMA in response to RAC comments (see areas 1-5, 10); and (3) to fine-tune details of implementation, taking into account training and drill experience (see areas 2, 6-8, 10). As with previous revisions to the plan, the number of pages included as changed is misleading as to their aggregate complexity. Alteration of even one word on a page requires labeling the entire page Rev. 5; numerous pages have only one or a very few lines changes as the result of, e.g., an organizational name change; various changes, while relatively straightforward in themselves, must be propagated through the Plan, Appendix A, and Implementing Procedures for consistency, resulting in changes to significant numbers of pages. Changes in organizational names or job titles afford one example. Changes due to the movement of relocation centers in Suffolk County to a reception center and congregate care centers in Nassau County is another, necessitating changes in 121 total pages including 20 maps. That the number of pages changed represents a change of detail in implementation, and not in concept or planning basis, is underscored by the fact that the majority of changed pages are in the Implementing Procedures.

Finally, a note regarding the legal authority section of the Plan (Section 1.4) is in order. As you no doubt know, the legal authority under state law for certain of LILCO's actions contemplated under the Plan is being litigated in Cuomo v. LILCO, Consol. Index No. 84-461 (N.Y.S.C., Feb. 20, 1985), and an appeal is pending before the New York Appellate Division, Second Department; the issue of federal preemption of certain state laws by the Atomic Energy Act, decided in Long Island Lighting Company (Shoreham Nuclear Power Station, Unit 1), ___ NRC ___ (slip. op. April 17, 1985) is pending on appeal before the Atomic Safety and Licensing Appeal Board.^{1/} Related issues are also on appeal in Citizens for an Orderly Energy Policy, Inc. v. County of Suffolk, 604 F. Supp. 1084 (E.D.N.Y. 1985) and Prospect v. Cohalan, Index No. 85-10520, (N.Y.S.C. July 19, 1985) (Brown, J.). See also Prospect v. Cohalan, Index No. 85-10520, ___ N.Y.2d ___ (No. 440, July 9, 1985). When appeals in these proceedings are complete, the legal

^{1/} Oral argument on that issue is scheduled for August 12, 1985.

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authority section of the LILCO Plan will be revised as appropriate to reflect the decisions rendered. For the present, certain minor wording changes have been made to the legal authority section to reflect the Licensing Board's April 17, 1985 Partial Initial Decision.

The principal areas of change in Revision 5 are listed below, followed by the pages affected in each area:

1. Reception and Congregate Care Centers: Changes reflecting the move from relocation centers in Suffolk County to a reception center and congregate care centers in Nassau County, comporting with LILCO's testimony before the ASLB (121 pages).

Plan Pages Affected: 1.3-1, 5; 2.2-2, 2a; Fig. 2.2.1; 3.6-7; 3.7-2; 3.8-2, 3; 3.9-5, 6; 4.2-1, 2; Fig. 4.2.1; Fig. 4.2.2; 4.6-1; 4.8-1

Appendix A Pages Affected: III-37, -38, -39; IV-7, -52, -53 through -62, -64, -72a, -72b, -72c, -72d, -72e, -75, Fig. 9, -79, Fig. 10, -82a, Fig. 11, -86, Fig. 12, -90, Fig. 13, -94, -95, -96a, Fig. 14, -103, -104, Fig. 15, -108a, -109, Fig. 16, -113, Fig. 17, -118, -119, Fig. 18, -123, -124, Fig. 19, -131, Fig. 20, -135, Fig. 21, -140, Fig. 22, -144, Fig. 23, -149, Fig. 24, -154, -154a, Fig. 25, -158, Fig. 26, -162, Fig. 27, Fig. 27.2, -165b, -165c, -165d

Procedures Pages Affected:

OPIP 4.2.3: All 26 pages
 OPIP 4.6.1: All 8 pages

2. Evacuation: Changes reflecting (a) new transfer point locations, (b) adjustments to the EPZ boundary to comply with the ASLB's Partial Initial Decision, and (c) deletion of trailblazer signs, minor routing changes, corrections in traffic control descriptions, renumbering of some traffic control points, and changes in description of handling of special populations, all comporting with LILCO's testimony before the ASLB (131 pages).

Plan Pages Affected: Fig. 3.5.1; 4.5-1; Fig. 4.5-1

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Appendix A Pages Affected: Fig. 2; Fig. 3; II-10, -10a; Figs. 4, 5, 6, 7, 7.1; Exbt. 1, 2; IV-19, -24, -25, -70, -74c, -74e, -74f, -74g, -74h, -98; Fig. 14.1; -105; Fig. 15.1, 18.1; -126; Fig. 19.1; -137; Fig. 21.1; -141, Fig. 22.1, 23.1, 24.1; -159; Fig. 26.1; -166, -166a, -166b, -172, -173, -174, -177; V-2, -2a; Fig. 28, 29, 30

Procedures Pages Affected:

OPIP 3.6.3: 3, 5-8, 14, 23-33, 35, 40, 52, 53, 59-64
OPIP 3.6.5: 8-12, 44, 45, 50-53, 55-58, 60
OPIP 3.8.1: 19, 22, 27-32
OPIP 3.8.2: 41, 49, 58-63
OPIP 4.5.1: All 22 pages

3. Training: Changes to define tabletop drills, minor adjustments in training requirements, and revisions comporting with LILCO's testimony before the ASLB (39 pages).

Plan Pages Affected: 5.1-1, 2, 3, 4, 5, 6, 7, 8, 9; Fig. 5.1.1 (2 Pg), 5.2-1, 2, 3, 4, 5, 6, 7; Fig. 5.2.1 (2 Pg)

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 5.1.1: 1, 2, 4-20

4. Dosimetry and Radiation Monitoring: Changes in monitoring evacuees and emergency workers to respond to RAC comments, comporting with LILCO's testimony before the ASLB (55 pages).

Plan Pages Affected: 3.9-2, 3, 4; Fig. 3.9.1; 4.3-1, 2

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 3.9.2: All 49 pages

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5. Dose Assessment and Protective Actions: Changes (a) responding to RAC comments asking LILCO to delete references to LERO monitoring and to clarify the role of the DOE RAP team, (b) reflecting the more sophisticated outputs available for the computer program used by LILCO, allowing, for example, computerization of the nomogram previously used in hand calculations in the Plan, and projection of doses based on an in-plant monitor, and (c) adding the results of sensitivity studies of evacuation time estimates comporting with LILCO's testimony before the ASLB and complying with the ASLB's Partial Initial Decision (132 pages).

Plan Pages Affected: 3.5-2, 2a, 3; 3.9-1; 4.4-1; 5.3-1

Appendix A Pages Affected: None

Procedures Pages Affected:

<u>OPIP 3.5.2:</u>	1, 2, 8-72, 76-95, 99-112, 118-121
<u>OPIP 3.6.1:</u>	2, 39, 39a-39c, 40-42, 42a, 44b-44e
<u>OPIP 3.10.1:</u>	6, 7
<u>OPIP 4.2.2:</u>	1, 2, 2a, 3
<u>OPIP 5.3.1:</u>	6, 7

6. Notification and Communications: Additional details concerning siren activation, supplementary notification, and specific equipment used to communicate with LERO field personnel (29 pages).

Plan Pages Affected: 3.3-4, 5, 6; Fig. 3.3.5, 3.3.7; 3.4-3, 4, 7; Fig. 3.4.1; 4.1-4; Att. 4.1.1

Appendix A Pages Affected: IV-6

Procedures Pages Affected:

<u>OPIP 3.3.2</u>	2-8, 12, 13, 14
<u>OPIP 3.3.4:</u>	1-6, 9

7. Security: Procedure to implement security requirements at LERO facilities (46 pages).

Plan Pages Affected: 4.7-1

Appendix A Pages Affected: None

Procedures Pages Affected:

<u>OPIP 4.7.1:</u>	All 45 pages
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8. Personnel Revisions: Changes resulting from new job titles or reporting locations, or reassignment or clarification of duties (81 pages).

Plan Pages Affected: 2.1-5, 6; Fig. 2.1.1 (4 Pg); Fig. 2.1.2; 3.3-1, 2, 3; Fig. 3.3.2; Fig. 3.3.3 (3 Pg); Fig. 3.3.4 (3 Pg); Fig. 3.3.6 (2 Pg); 3.6-4; Fig. 3.6.1; Fig. 3.7.1; 3.8-1, 4; Fig. 3.8.1; 4.1-1; 5.4-1

Appendix A Pages Affected: None

Procedures Pages Affected:

OPIP 3.3.1:	1-4
OPIP 3.3.2:	1, 9, 11, 15
OPIP 3.3.3:	2, 3, 4, 6-12
OPIP 3.3.4:	7, 11, 12
OPIP 3.6.1:	1
OPIP 3.6.2:	4, 5, 6, 10
OPIP 3.6.3:	1, 2, 4
OPIP 3.8.1:	1, 2, 3, 5
OPIP 3.9.1:	25
OPIP 3.10.1:	1, 3, 4
OPIP 3.10.2:	1
OPIP 4.1.1:	1-5
OPIP 4.1.2:	1-5
OPIP 4.3.1:	1-6

9. Annual Update: Details that change on a regular basis and must be revised, including addresses, phone numbers, ingestion pathway listings, document references, evacuation listings, and letters of agreement (202 pages).

Plan Pages Affected: 1.4-1, 1a, 2, 2a, Att. 1.4.1; 2.2-4; 3.4-1, 2, 5; 3.6-2, 3; 3.6-7a, 8, 8a; 3.11-1; B-v, vi, vii, C-i

Appendix A Pages Affected: II-14, IV-167, -168, -175, -178

Procedures Pages Affected:

OPIP 3.3.1:	7, 8
OPIP 3.6.2:	1
OPIP 3.6.5:	21-27, 39-43
OPIP 3.6.6:	23, 24, 25a-25o, 28, 28a, 29-35, 35a-35g, 36-40, 40a-40q, 41a-41k, 42-46, 46a-46d
OPIP 3.10.1:	9
OPIP 4.2.2:	3a-3e, 4, 5

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10. Implementation Details: Minor changes and expansion of procedural details (a) to make procedures easier to use (e.g., reordering steps to follow in accomplishing a task), or (b) to make a page consistent with changes made elsewhere in the Plan and procedures in response to ASLB or RAC comments (774 pages).

Plan Pages Affected: 2.1-4; 2.2-4g; Fig. 3.3.1 (2 Pg); 3.4-6, 8; Table 3.9.1; Atts. 3.9.1, 3.9.2, 3.9.3; 3.10.1, 4.1-3, 4; Figs. 4.1.1, 4.1.2, 4.1.3

Appendix Pages Affected: II-19, -28, -29; III-35, -36; IV-4, -63, -67, -68, -69, -69a, -73, -74, -74a, -74b, -74d, -74i, -74j, -74ja, -74k, -74l, -74la, -74m, -74ma, -74mb, -74n, -74na, -74nb, -74o, -74p, -74pa, -74pb, -74q, -74qa, -74qb, -74r, -74ra, -74rb, -74s, -74t, -74ta, -74u, -74ua, -74ub, -74v, -74w, -74wa, -74x, -74xa, -74xb, -169, -176; V-8

Procedures Pages Affected:

<u>OPIP 1.1.1:</u>	1, 4, 5, 6
<u>OPIP 2.1.1:</u>	1, 3, 4, 6, 7, 8, 11, 12, 12a, 13, 14, 16-24, 26, 29, 30, 35, 37, 44, 47, 48, 50-55, 58-61, 65a, 69a, 71, 73, 74, 76-79
<u>OPIP 3.1.1:</u>	All 81 pages
<u>OPIP 3.3.4:</u>	8, 10, 13-16
<u>OPIP 3.3.5:</u>	All 41 pages
<u>OPIP 3.4.1:</u>	All 9 pages
<u>OPIP 3.4.2:</u>	All 8 pages
<u>OPIP 3.5.2:</u>	3-7, 73, 74, 75, 96, 97, 98, 113, 116, 117, 122-125
<u>OPIP 3.6.1:</u>	3-5, 5a-5m, 6-26, 28, 32, 34, 37
<u>OPIP 3.6.2:</u>	7, 9
<u>OPIP 3.6.3:</u>	9-13, 15-22, 34, 41-51, 57, 58, 65-77
<u>OPIP 3.6.4:</u>	All 124 pages
<u>OPIP 3.6.5:</u>	1-7, 13-20, 38, 46-49, 59
<u>OPIP 3.6.6:</u>	1, 1b, 1d, 1e, 1ea, 1f, 9, 12, 13, 14, 17, 50b
<u>OPIP 3.7.1:</u>	1, 2, 4
<u>OPIP 3.8.1:</u>	4, 6-18, 20, 21, 23-26
<u>OPIP 3.8.2:</u>	1-40, 42-48, 50-57
<u>OPIP 3.9.1:</u>	1-18, 20-24, 26-30
<u>OPIP 4.1.1:</u>	6-25
<u>OPIP 4.1.2:</u>	6, 7
<u>OPIP 4.2.2:</u>	6

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OPIP 4.3.1:	7-18
OPIP 5.1.1:	21, 15
OPIP 5.3.1:	2, 3, 5, 10-97
OPIP 5.4.1:	2-18

11. Document Upkeep: Changes in List of Effective Pages, Acronyms, Table of Contents, pages intentionally left blank, and changes to correct references, grammar, or spelling (70 pages).

Plan Pages Affected: ii-xi; xiii-xix; 1.1-1; 1.3-9; 2.2-4h; 3.8-4a

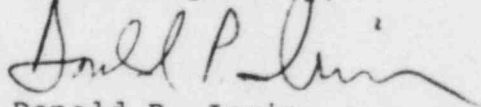
Appendix A Pages Affected: List of effective pages 1-4, p. I-4, ii, iia, iii; IV-65

Procedures Pages Affected:

	i-ix
OPIP 3.3.2:	10, 16, 17, 18
OPIP 3.3.3:	1, 5
OPIP 3.5.2:	114, 115
OPIP 3.6.2:	8
OPIP 3.6.3:	36-39, 54, 55, 56
OPIP 3.6.5:	54
OPIP 3.6.6:	19, 15, 16
OPIP 3.9.1:	19
OPIP 3.10.1:	2, 5, 8
OPIP 5.1.1:	3, 22, 23, 24, 26
OPIP 5.3.1:	8, 9

LILCO trusts that this letter will be of use to you in reviewing Revision 5 changes.

Yours very truly,



Donald P. Irwin
One of Counsel
to Long Island Lighting Company