

LILCO, February 29, 1988

RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 MAR -7 P3:55

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

**LILCO'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO
NEW YORK STATE'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

LILCO hereby supplements its responses to the State of New York's First Set of Interrogatories and Request for Production of Documents, dated and served on LILCO on January 22, 1988.

**I. GENERAL ANSWERS AND OBJECTIONS TO
INTERROGATORIES, DEFINITIONS, AND INSTRUCTIONS**

LILCO gives the same general answers and makes the same general objections to New York State's Interrogatories, Definitions, and Instructions that it made in response to Suffolk County's First Set of Interrogatories and Request for Production of Documents. See LILCO's Responses and Objections to Suffolk County's First Set of Interrogatories and Request for Production of Documents (January 20, 1988), at 1-2.

II. SUPPLEMENTAL ANSWERS AND OBJECTIONS TO INTERROGATORIES

New York State Interrogatory No. 9

Elaborate on the statements made on page 16 of "LILCO's Motion for Summary Disposition of Contention 25.C ('Role Conflict' of School Bus Drivers)," dated October 22, 1987, and elaborate on the statements made by Mr. Crocker in paragraph 15 of his associated affidavit, by providing, on a lettered subpart by subpart basis, the following information with respect to non-LILCO school bus drivers who LILCO relies upon to

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drive buses to implement LILCO's new schools evacuation proposal: (a) amount of money and other considerations LILCO will give to each school bus driver for each hour of classroom training on Shoreham emergency planning; (b) amount of money and other considerations LILCO will give to each school bus driver for each hour spent participating in drills and exercises; (c) amount of money and other considerations LILCO will give to each school bus driver for each hour spent responding to an actual emergency at Shoreham; (d) amount of money and other considerations LILCO will give to each school bus driver as a sign-on or a year-end bonus or as a bonus of any type; (e) amount of money and other considerations LILCO will give to each school bus driver for any reason not stated above. The term "other considerations" includes, but is not limited to, reimbursement for mileage, child care, telephone installation and maintenance, meals, lodging, insurance, driver's license and registration, as well as the actual provision of services, objects or benefits such as child care, telephones, vehicles, utilities, leave, stock or incentives of any kind.

Supplemental Response: Notwithstanding LILCO's objections to the relevancy of New York State's Interrogatory No. 9, stated in the initial response to this interrogatory, LILCO's response to 9(a) and 9(b) is that, subject to negotiation between LILCO and the bus companies, non-LILCO participants will receive their regular compensation (plus overtime wages, as appropriate) for each hour spent in classroom training and participating in drills and exercises. LILCO's response to 9(c) is that LILCO does not contemplate paying any non-LILCO emergency worker any compensation for responding during an actual emergency and to 9(d) is that non-LILCO participants will receive year-end bonuses of some as yet undetermined amount, subject to negotiation between LILCO and the bus companies, for their participation in LILCO's school bus driver program.

New York State Interrogatory No. 10

Elaborate on the statements made on page 16 of "LILCO's Motion for Summary Disposition of Contention 25.C ('Role Conflict' of School Bus Drivers)," dated October 22, 1987, and elaborate on the statements made by Mr. Crocker in paragraph 16 of his associated affidavit, by providing, on a lettered subpart by subpart basis, the following information with respect to LILCO-employed LERO workers who LILCO relies upon to drive buses to implement LILCO's new schools evacuation proposal: (a) amount of money and other considerations LILCO will give each bus driver for each hour of classroom training on Shoreham emergency planning; (b) amount of money and other considerations LILCO will give to each bus driver for each hour spent participating in drills and exercises; (c) amount of money and other considerations LILCO will give to each

bus driver for each hour spent attending, or studying for, school bus driver training classes for a class 2 license, and taking the class 2 driving test; (d) amount of money and other considerations LILCO will give to each bus driver for each hour spent responding to an actual emergency at Shoreham; (e) amount of money and other considerations LILCO will give to each bus driver as a sign-on or year-end bonus or as a bonus of any type; (f) amount of money and other considerations LILCO will give to each bus driver for any reason not stated above. The term "other considerations," as used herein, has the same meaning as is set forth in Interrogatory No. 9.

Supplemental Response: Notwithstanding LILCO's objections to the relevancy of New York State's Interrogatory No. 10, stated in its initial response to this interrogatory, LILCO's response to 10(d) and (f) is that, apart from LERO emergency workers' ordinary pay (and, as appropriate, overtime wages), LILCO does not contemplate providing any compensation to LERO workers for responding to any actual emergency at Shoreham.

New York State Interrogatory No. 12

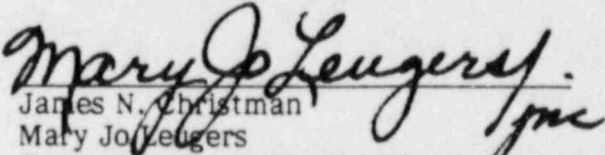
Has LILCO ever met (on or about January 14, 1988 or at any other time), or engaged in telephone conversations or discussions, with the NRC or FEMA regarding in any way LILCO's schools evacuation proposal? If the answer is affirmative: (a) identify the dates and locations of the meetings or the dates of the telephone conversations; (b) identify all attendees or participants; (c) specifically describe all statements that were made about LILCO's schools evacuation proposal; (d) attribute all such statements to particular individuals; and (e) provide any documents that concern LILCO's schools evacuation proposal that were produced in preparation for, during, or as a result of the meetings, telephone conversations or discussions.

Supplemental Response: LILCO's answer to Interrogatory No. 12 is no. LILCO's reference in its previous answer to the Staff's response to LILCO's summary disposition motion was only intended to mean that LILCO learned of the Staff's position on the school bus driver issue at the same time all other parties did, i.e., when the Staff filed its response. No "conversations or discussions" of the type inquired about in Interrogatory No. 12 occurred.

Objections Stated by Counsel

All objections and references to objections were stated by counsel.

Respectfully submitted,

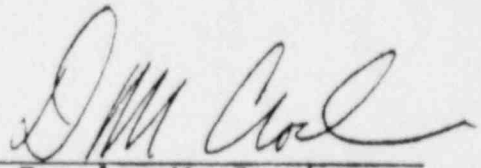

James N. Christman
Mary Jo Leugers
Counsel for Long Island Lighting Company

Hunton & Williams
707 East Main Street
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DATED: February 29, 1988

VERIFICATION

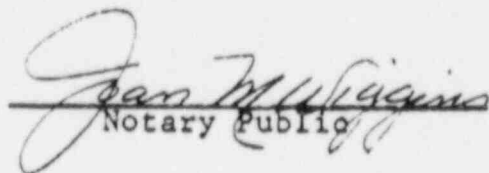
Douglas M. Crocker, being first duly sworn on oath, deposes and says: that he is currently the Manager, Nuclear Emergency Preparedness, Nuclear Operations Support Department for Long Island Lighting Company; that he has personal knowledge of a portion of the subject matter of this litigation; that responsible corporate employees have provided him with additional facts necessary to provide the information contained in the foregoing Answers to Interrogatories; that he has read the answers, and knows the contents thereof; and that based upon such information of which he has personal knowledge and with which he has been provided, he is informed and believes the matters stated therein to be true, and on these grounds alleges that the matters stated therein are true and therefore verifies the foregoing on behalf of Long Island Lighting Company.



Douglas M. Crocker

State of New York SS:

I, Joan M. Wiggins, a Notary Public in and for the jurisdiction aforesaid, hereby certify that Douglas M. Crocker, whose name is signed to the foregoing Answers to Interrogatories, dated February 29, 1988, has personally sworn before me that the statements therein are true to the best of his knowledge and belief.



Notary Public

My Commission expires: 9/15/88

JOAN M. WIGGINS
NOTARY PUBLIC, State of New York
No. 4859591
Qualified in Nassau County
Commission Expires September 15, 1988

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CERTIFICATE OF SERVICE

OFFICE OF THE CLERK
DOCKETING & SERVICE
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LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322-OL-3

I hereby certify that copies of LILCO'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO NEW YORK STATE'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS and LILCO'S RESPONSE TO NEW YORK STATE'S MOTION TO COMPEL OF FEBRUARY 12, 1988 were served this date upon the following by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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DATED: February 29, 1988


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