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RELATED CORRESPONDENCE

DOCKETED  
March 30 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 MAR -7 P2:40

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power Station,  
Unit 1) )

Docket No. 50-322-OL-3  
(Emergency Planning)

SUFFOLK COUNTY'S SECOND SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO THE LONG ISLAND LIGHTING COMPANY  
REGARDING HOSPITAL EVACUATION

Pursuant to 10 CFR §§ 2.740b and 2.741, and in accordance with the Definitions and Instructions attached to Suffolk County's First Set of Interrogatories and Request for Production of Documents to the Long Island Lighting Company Regarding Hospital Evacuation (Feb. 29, 1988), LILCO is requested by Suffolk County to answer separately and fully, under oath, each of the interrogatories set forth below, and to produce for inspection and copying, at the offices of Kirkpatrick & Lockhart, the documents specified below that are within the possession, custody, or control of LILCO.

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PDR ADOCK 05000322  
G PDR

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## INTERROGATORIES AND DOCUMENT REQUESTS

1. Explain in detail the methodology used to calculate the hospital evacuation time estimates.

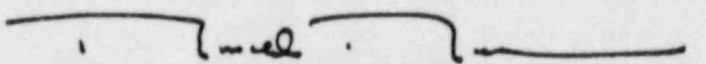
2. Were any computerized traffic simulation models used in deriving the hospital evacuation time estimates? If so, identify the model and identify all inputs. Provide all documents, including, but not limited to computer printouts, reflecting any and all inputs and outputs.

3. Do LILCO's hospital evacuation time estimates assume simultaneous evacuation of hospitals and other special facilities? If so, provide all documents detailing the procedures to be followed to implement such simultaneous evacuation of hospitals in and around the EPZ and other special facilities.

4. Revision 9 identifies various travel speeds for different hospital evacuation routes. Explain all bases for these travel speeds, including, but not limited to, all underlying assumptions on which such travel speeds are based.

Respectfully submitted,

E. Thomas Boyle  
Suffolk County Attorney  
Building 158 North County Complex  
Veterans Memorial Highway  
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Christopher M. McMurray  
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Attorneys for Suffolk County

March 3, 1988

DOCKETED  
March 3, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
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In the Matter of )

LONG ISLAND LIGHTING COMPANY )

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CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE LONG ISLAND LIGHTING COMPANY REGARDING HOSPITAL EVACUATION have been served on the following this 3rd day of March, 1988 by U.S. mail, first class, except as otherwise indicated.

James P. Gleason, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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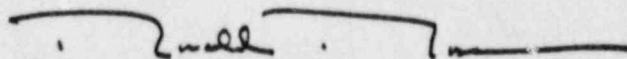
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