

RELATED CORRESPONDENCE

DOCKETED
USNPC
March 3, 1988

'88 MAR -7 P4:26

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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 FOURTH SUPPLEMENTAL RESPONSE
TO LILCO'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING
ROLE CONFLICT OF SCHOOL BUS DRIVERS

Suffolk County hereby supplements its Answers of January 19, and its Supplemental Responses of January 27, February 15, and February 17, 1988, to LILCO's First Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers ("LILCO's First Discovery Request").

LILCO Interrogatory No. 11

11. Identify any contacts and communications the Intervenors have had with any school or school district in the EPZ regarding evacuation of those schools during a Shoreham emergency. Include for each contact and communications, the school or school district contacted and the person talked with, the date of each contact, and the substance of each conversation. Please produce any documents related to such contacts.

Answer. By letter dated February 19, 1988, Karla J. Letsche of Kirkpatrick & Lockhart contacted the Miller Place Union Free School District. As this contact concerned anticipated litigation of LILCO's new schools evacuation proposal, the letter is protected by the work product doctrine and will not be produced.

All other information responsive to this Interrogatory has previously been provided to LILCO. See Second Supplement to Suffolk County's Answers to LILCO's First Set of Interrogatories and Document Requests Regarding Role Conflict of School Bus Drivers, dated February 15, 1988. Any other contacts Suffolk County has had with schools or school districts since the filing of its February 15 Supplemental Response have involved the scheduling and preparation of Suffolk County witnesses for depositions taken by counsel for LILCO.

LILCO Interrogatory No. 18

18. Please identify and provide a copy of any document not already identified in response to Interrogatories 7 and 11-14 above on which Intervenor's intend to rely in support of their position on the issue of whether there will be a sufficient number of school bus drivers to evacuate schools during a Shoreham emergency.

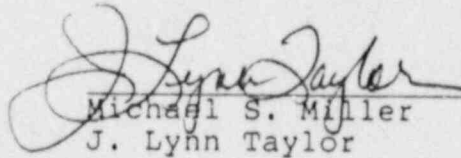
Answer. The following documents will be relied upon by the Governments in support of their position that LILCO's schools

evacuation proposal is inadequate. Mt. Sinai Parents Teachers Organization Draft Resolution, undated; Mt. Sinai Teachers Association Resolution, undated; Mt. Sinai Union Free School District Resolution, dated October 18, 1983; Middle Country Central School District Board of Education Resolution, dated November 7, 1983; Middle Island Central School District School Board Resolution, dated September 29, 1983; Miller Place Union Free School District Board Resolutions, dated September 1, 1983 and February 10, 1988.

With the exception of the Miller Place Union Free School District Board Resolution of February 10, 1988, which was provided to LILCO by counsel for Suffolk County under cover letter dated February 26, 1988, the other resolutions referenced above, as well as other school resolutions and other documents that may be relied upon by Suffolk County, were attached to prefiled testimony submitted by Suffolk County in the 1983-84 emergency planning litigation. These resolutions are therefore as accessible to LILCO as Suffolk County and are not produced with this Supplemental Response. Nevertheless, the information here set forth is responsive to an outstanding LILCO discovery request. In addition, this information was requested by counsel

for LILCO at the February 24 deposition of Suffolk County witness Dr. Bruce Brodsky, who is a member of the Board of Education of the Middle Country Central School District.

Respectfully submitted,


Michael S. Miller
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March 3, 1988

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CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S FOURTH SUPPLEMENTAL RESPONSE TO LILCO'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS and SUFFOLK COUNTY'S SECOND SUPPLEMENTAL RESPONSE TO LILCO'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS have been served on the following this 3rd day of March, 1988 by U.S. mail, first class, except as otherwise noted.

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Washington, D.C. 20555

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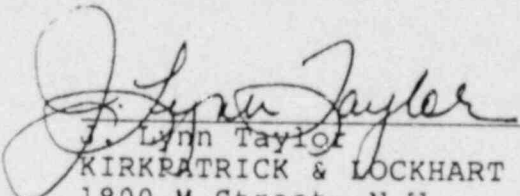
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