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RELATED CORRESPONDENCE

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March 3, 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 MAR -7 P4:11

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, Unit 1))	

SUFFOLK COUNTY'S SECOND SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO LONG ISLAND
LIGHTING COMPANY REGARDING EMERGENCY BROADCAST SYSTEM

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, dated February 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.

INTERROGATORIES AND DOCUMENT REQUESTS

1. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim that "LILCO's new provisions

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for transmitting emergency messages and activating tone alert radios are inadequate and do not comply with regulatory requirements." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

2. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim in Contention 1.A that "WPLR's broadcast signal is too weak to carry a strong and clear message throughout the EPZ and surrounding areas." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

3. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim in Contention 1.B that "[T]he hilly geography of Long Island combined with the directional location of WPLR's transmitters diminish the strength of its broadcast signal." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

4. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim in Contention 1.C that "[H]aving no AM broadcasting ability, unlike its predecessor WALK, LILCO fails to comply with regulatory requirements that there be a capability to issue emergency messages on a 24-hour basis." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

5. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim in Contention 1.F that "WPLR is based in Connecticut and LILCO's plan is therefore not in compliance with regulatory requirements." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

6. List each and every factor, basis or reason that LILCO will rely upon to rebut the claim in Contention 2.A that "[T]here is a portion of the population in and around the EPZ that might not receive emergency information due to significant gaps in the EPZ's network coverage." Please identify and provide a copy of every document concerning any such factors, bases, or reasons.

7. What is the minimum acceptable signal strength and coverage of the EBS radio stations necessary for activation of any and all tone alert units? Provide a copy of all documents relating to such signal strength and coverage.

8. What is the minimum acceptable signal strength and coverage of the EBS radio stations necessary to permit the public to receive emergency information via the EBS network? Provide a copy of all documents relating to such signal strength and coverage.

9. Provide copies of all correspondence to or from, and any other documents or information sent by or on behalf of LILCO, to, or received from, Cohen and Dippell, P.C., or any partner, officer, director, employee, contractor or agent thereof.

10. (a) In the document entitled "Participating Stations," produced to the Governments on or about March 2, 1988, why was WRIV (AM) not included or referenced? (b) Who prepared this document? (c) Why was it prepared? (d) What is the definition, and quantitative measurement, of the term "coverage" included in the document?

11. Provide copies of all correspondence to or from, and any other documents or information sent by or on behalf of LILCO, to, or received from, the Bureau of Standards, including the National Technical Information Service, or any employee, contractor or agent thereof.

12. Were radio stations WINS and WCBS ever considered for inclusion within LILCO's EBS network? If so, why? List any and all reasons why WINS and WCBS were not included within LILCO's EBS network. Provide a copy of all documents relating to this interrogatory.

13. (a) Why are "terrain roughness correction procedures" not used by the Federal Communications Commission, as referenced

in a letter dated May 7, 1987 from Robert W. Guill to Douglas Crocker? (b) How are these procedures different from the "standard FCC procedure"? (c) What is the most accurate "terrain roughness" factor applicable for each zone of the EPZ? (d) Provide a copy of all documents concerning the use of either "terrain roughness correction procedures" or the "standard FCC procedure" for measuring the signals or contours of stations included in LILCO's EBS network, and/or considered for inclusion within LILCO's EBS network.

14. (a) What is the "FCC recognized service to the EPZ zone" referenced in the letter dated May 7, 1987 from Robert W. Guill to Douglas Crocker and provided to Suffolk County on or about March 2, 1988? (b) List each and every factor, basis or reason for the belief or opinion that radio stations WINS and WBLI do not provide "FCC recognized service to the EPZ zone"? (c) Does each station in LILCO's EBS network provide "FCC recognized service to the EPZ zone"? (d) If not, in what way(s) do they not provide such service? (e) Provide a copy of all documents concerning the "FCC recognized service to the EPZ zone" as relates to stations in LILCO's EBS network, or stations considered for inclusion within LILCO's EBS network.

15. What signal strength, as referenced on page 3 of the Engineering Report concerning radio stations WINS and WBLI dated

June 1987, is LILCO relying on as an appropriate level for service to the population in the EPZ?

16. Provide the specifications of, and data sheet for, the E.A.R. tone alert radios referenced in the December 15, 1987 "Action Steps" memorandum prepared by C.A. Daverio.

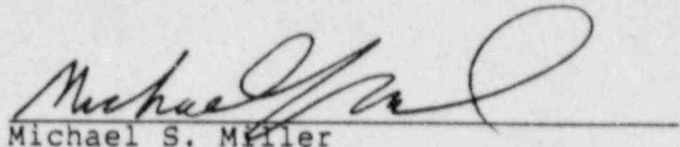
17. Provide all data and correction factors used to determine the curves for 1 mV/m and the Interference-Free Contour, as shown on the "Computed Service Contours Map for WEZN (based on FCC Prediction Method)," dated May 1987.

18. What stations or other factors contribute to the limits of interference-free reception, as reflected by the Interference-Free Contour depicted on the "Computed Service Contours Map for WPLR (FM) (based on FCC Prediction Method)," dated May 1987?

19. What radio stations have declined to participate in LILCO's proposed EBS network? For each such situation, please specify the reason(s) why the station declined to participate. Provide a copy of all documents relating to this interrogatory.

Respectfully submitted,

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March 3, 1988

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In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

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

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S SECOND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO LONG ISLAND LIGHTING COMPANY REGARDING EMERGENCY BROADCAST SYSTEM 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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