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RELATED CORRESPONDENCE

DATE: March 23, 1988

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)

Unit 1))

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

RESPONSE OF THE STATE OF NEW YORK TO LILCO'S
FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS REGARDING REALISM

This is the State of New York's response to "LILCO's First Set of Interrogatories and Requests for Production of Documents Regarding Contentions 1-2, 4-8, and 10 to Suffolk County, New York State, and the Town of Southampton," dated March 9, 1988 ("LILCO's First Set of Realism Interrogatories and Requests").

To the extent that LILCO's First Set of Realism Interrogatories and Requests seeks information and documents of any sort that are not within the possession, custody or control of the State of New York, but, rather within the possession, custody or control of counties, towns, school districts, or other local governments (including Suffolk County and the Town of Southampton), the State of New York objects. Counties, towns, school districts, or other local governments are autonomous from

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the State of New York and are not within the State of New York's control. Accordingly, the burden of obtaining such information is the same for LILCO as it is for the State of New York.

To the extent that LILCO's First Set of Realism Interrogatories and Requests seeks information and documents of any sort that are protected against disclosure, for example, by attorney work product doctrine, the State of New York objects.

LILCO Interrogatory Nos. 1-7

1. Please identify, on a contention-by-contention basis, each witness Intervenor expects to call to testify on Contentions 1 and 2 (directing traffic), Contention 4 (removing road obstructions), Contention 5 (activating sirens and broadcasting EBS messages), Contention 6 (making protective action decisions), Contention 7 (ingestion pathway), Contention 8 (recovery and reentry), and Contention 10 (access control) as set forth in the Board's order ruling on LILCO's summary disposition motion on the realism contentions. Memorandum and Order (Ruling on LILCO's Motions for Summary Disposition of Contentions 1,2,4,5,7,8 and 10, and Board Guidance on Issues for Litigation) (Feb. 29, 1988). For each witness, other than experts, that Intervenor expects to call, state on a contention-by-contention basis the subject matter on which he is expected to testify and the substance of the facts to which he is expected to testify. For each witness that Intervenor expects to call as an expert witness, state on a contention-by-contention basis the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and the summary of the grounds for each such opinion.

Response: As of this date, the State of New York has not identified any witnesses it expects to call to testify on Contentions 1,2,4,5,6, 7,8 and 10.

2. For each witness, please provide a copy of his most current curriculum vitae, resume, or statement of professional

qualifications.

Response: See the response to Interrogatory No. 1.

3. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on any matter related in any way to the substance of the issues in Contentions 1-2, 4-8, and 10. State on a contention-by-contention basis which contention the witness's testimony concerns.

Response: See the response to Interrogatory No. 1.

4. Please provide a copy of any prefiled testimony listed in response to Interrogatory 3 above.

Response: See the response to Interrogatory No. 1.
5. Please identify all articles, papers, and other documents authored or coauthored by each witness pertaining to the substance of the issues in Contentions 1-2, 4-8, and 10.

Response: See the response to Interrogatory No. 1.

6. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses, or other documents with respect to the substance of the issues in Contentions 1-, 4-8, and 10.

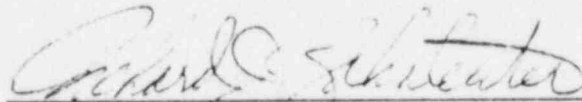
Response: See the response to Interrogatory No. 1.

7. Unless the answer to Interrogatory 6 above is a simple negative, please identify each document in the Intervenor's response to these Interrogatories according to Definition K and provide copy of each document.

Response: See the response to Interrogatory No. 1.

Objections Stated by Counsel

Counsel states all objections, assertions of privilege, and answers not requiring verification.

A handwritten signature in cursive script, appearing to read "Richard J. Zahnleuter", is written over a horizontal line.

Fábian G. Palomino
Richard J. Zahnleuter
Special Counsel to the Governor

Attorneys for Mario M. Cuomo,
Governor, and the State of New York

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Response of the State of New York to LILCO's First Set of Interrogatories and Request for Production of Documents Regarding Realism" have been served on the following this 23rd day of March 1988 by U.S. Mail, first class, except as noted by asterisks.

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