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LILCO, March 24, 1988

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NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

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

LILCO'S SECOND 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

Long Island Lighting Company, by its counsel, propounds the following interrogatories to Suffolk County, New York State, and the Town of Southampton ("Intervenor" or "the Intervenors"), pursuant to §§ 2.740, 2.740b, and 2.741 of the Nuclear Regulatory Commission's Rules of Practice. By propounding these interrogatories and requests for production of documents LILCO makes no admission or representation about the proper scope of the issues to be decided or the evidence that may be presented.

INSTRUCTIONS AND DEFINITIONS

Except as supplemented below, the "Instructions" and Definitions" for this second set of interrogatories on the "best efforts" issue are the same ones set out in 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.

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### SUPPLEMENTAL INSTRUCTIONS

The primary documentary basis for these Interrogatories, other than the Shoreham offsite emergency plan, is Intervenor's responses to LILCO's summary disposition motions on the realism issues. The bulk of the interrogatories are derived from, and refer back to, specific allegations in those responses, with the goal of eliciting exactly what New York State and Suffolk County have in mind in specific instances where their pleadings appear to have denied that they would generally follow the LILCO offsite emergency plan. The goal is to learn exactly what, if anything, the State and County propose to do in such situations instead of what the Shoreham offsite plan proposes, and how what the State and County propose compares with what is done at other operating power plant sites in New York State, so that testimony for hearings can focus specifically on points of difference, if any exist. These interrogatories should be answered with this clarifying and illuminating purpose in mind.

The Interrogatories below that ask what New York State and/or Suffolk County would do under the circumstances postulated request information to the best of the State's or County's current knowledge, belief, and intention (whatever knowledge, belief, or intention underlie the answers in responses to summary disposition motions refusing to agree to generally follow the LILCO plan on a given issue). The lack of absolute certainty about the specifics of State/County response should thus not lead to answers that decline to answer on the basis of lack of such certainty.

The following Requests are numbered beginning where the first set, dated March 9, 1988, left off.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Alleged Inadequacies in a "Best Efforts"  
Response Generally Following the LILCO Plan

8. With respect to each of the following functions,
- a. activating the early warning sirens and directing the broadcast and contents of emergency broadcast system (EBS) messages in the event of a radiological emergency at Shoreham (hereinafter the "Contention 5 functions"),
  - b. making decisions and official recommendations to the public as to the appropriate actions necessary to protect the public health and safety, including deciding upon protective actions which will be communicated to the public, in the event of a radiological emergency at Shoreham (hereinafter the "Contention 6 functions"),
  - c. directing traffic, blocking roadways, setting up barriers in roadways, and channeling traffic in the event of a radiological emergency at Shoreham (hereinafter the "Contentions 1 and 2 functions"),
  - d. performing access control functions at the EPZ perimeter in the event of a radiological emergency at Shoreham (hereinafter the "Contention 10 functions"),
  - e. removing obstructions from public roadways, including the towing of private vehicles, in the event of a radiological emergency at Shoreham (hereinafter the "Contention 4 functions"),
  - f. making and implementing decisions and official recommendations to the public concerning protective actions for the ingestion exposure pathway in the event of a radiological emergency at Shoreham (hereinafter the "Contention 7 functions"), and
  - g. making and implementing decisions and official recommendations to the public concerning recovery and reentry in the event of a radiological emergency at Shoreham (hereinafter the "Contention 8 functions"),

please list each and every factor that Intervenor claim would prevent a "best efforts" response by New York State and Suffolk County, generally following the LILCO Plan, from satisfying the applicable NRC requirements.

Identification of Information and Documents  
Concerning a "Best Efforts" Response

Contention 5

9. With respect to the Contention 5 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Notification

10. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means by which New York State and Suffolk County emergency response personnel would be notified of a radiological emergency at Shoreham. Specifically, in Intervenor's Answer to LILCO's Motion for Summary Disposition of Contentions 5 and 6 (Feb. 10, 1988) (hereinafter "Answer to 5 and 6 Motion") on page 22 Intervenor states that "the issues presented by LILCO's realism defense to Contentions 5 and 6, CLI-86-13, and the new rule require this Board to determine how the Governments would respond in an emergency" and that "the Board's inquiry must focus" on certain matters, which you then list. With respect to these matters, in your response to this interrogatory please include answers to the following questions which Intervenor raised:
- a. How would the State learn of a Shoreham accident? (Answer to 5 and 6 Motion at 22.)
  - b. How long would it take New York State and Suffolk County to "react to a call from LILCO reporting that there had been an accident at Shoreham?" (Id.)



- c. Whom would the person or persons receiving the call in turn have to contact? How would those contacts be made and how long would such contacts take? (Id. at 22-23.)
11. To the extent not already provided in your response to Interrogatory No. 10, please answer the following questions with respect to the RECS lines to State offices:
- a. What is required to make the existing Shoreham RECS lines to the State "operational" and "capable of functioning?" (see Affidavit of James D. Papile, May 11, 1987, at 3 ¶ 4.)
  - b. If Shoreham were to operate at 100% power, would the State permit the RECS lines to be made operational?
  - c. Precisely how far is the nearest Shoreham RECS line drop from each of the following offices:
    - (i) REPG in Albany
    - (ii) the State Police Communications Center in Albany
    - (iii) the State EOC in Albany
    - (iv) the SEMO district office in Poughkeepsie?
  - d. Will the State permit LILCO, at LILCO's expense, to relocate the RECS lines to each of the above four locations?
  - e. Would the State permit LILCO, at LILCO's expense, to relocate the RECS lines to each of the above four locations if Shoreham were licensed to operate at 100 percent power?
12. To the extent not already provided in your response to Interrogatory No. 10, please answer the following:
- a. Identify and describe any and all procedures, methods, and means by which the Governor of New York and the Suffolk County Executive can be contacted or paged 24 hours a day. Identify those persons who have control of or access to those means of contact and describe how those persons can be contacted 24 hours a day.
  - b. If for any reason the Governor of New York could not be contacted or was otherwise not available to respond to a radiological emergency at Shoreham, who would be responsible for performing the Governor's duties in the Governor's absence? How would that person be contacted and informed of a radiological emergency at Shoreham?
  - c. If for any reason the Suffolk County Executive could not be contacted or was otherwise not available to respond to a radiological emergency

at Shoreham, who would be responsible for performing the Suffolk County Executive's duties in the County Executive's absence? How would that person be contacted and informed of a radiological emergency at Shoreham?

Sirens

13. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in activating the early warning siren system in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor's raised in their Answer to 5 and 6 Motion at 23:
  - a. Who from New York State and Suffolk County would need to be consulted in connection with a decision concerning when or how to activate the sirens? (Answer to 5 and 6 Motion at 23.)
  - b. How would such consultations take place and how long would they take? (Id.)
  - c. Who would make the decisions as to when and how to activate the sirens? (Id.)
  - d. What "data, information, and criteria" would be "needed, desired, consulted or relied upon" by the person or persons responsible for determining when to activate the sirens and how to do so? (Id.)
  - e. Who would "implement" the decision to activate the sirens? (Id.)
  - f. How long would it take to "implement" the decision to activate the sirens? (Id.)
14. To the extent not already provided in your response to Interrogatory No. 13, please answer the following:
  - a. Assuming that the public in the Shoreham 10-mile EPZ needed to be alerted quickly to the existence of a Shoreham radiological emergency, would the State and County allow the existing sirens to be sounded?
  - b. Is your answer the same if the State and County also assume that a public education brochure has been distributed annually throughout the EPZ telling people that they should tune their radios to the EBS when they hear the sirens?

EBS

15. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in activating an Emergency Broadcast System (EBS) in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 23:
  - a. Who would have to be "contacted" in connection with making a decision whether to activate an EBS? (Answer to 5 and 6 Motion at 23.)
  - b. How would those "contacts" be made and how long would it take to make such "contacts?" (Id.)
  - c. Who would need to be "consulted in connection with a decision concerning when or how to activate an EBS"? How would those "consultations" take place and how long would they take? (Id.)
  - d. Who would make the decisions as to when or how to activate an EBS? (Id.)
  - e. What "data, information, and criteria" would be "needed, desired, consulted, or relied upon" by the person or persons responsible for deciding when or how to activate an EBS? (Id.)
  - f. Who would "implement" the decision to activate an EBS? (Id.)
  - g. How long would it take to "implement" the decision to activate an EBS? (Id.)
  - h. What EBS would be chosen for use by New York State and Suffolk County? (Id.)
16. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in preparing and broadcasting EBS messages in the event of a radiological emergency at Shoreham. Specifically,

in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 24:

- a. Who would be responsible for determining the contents of EBS messages? (Answer to 5 and 6 Motion at 24.)
- b. What "criteria" would be used in determining the contents of EBS messages? (Id.)
- c. Who would be responsible for drafting EBS messages and how long would this drafting process take? (Id.)
- d. Who would be responsible for approving EBS messages and how long would this approval process take? (Id.)
- e. Who would broadcast EBS messages? (Id.)
- f. How would the broadcasts of EBS messages be made and how often would they be made? (Id.)

17. To the extent not provided in your response to Interrogatory No 16, please answer the following:

- a. Would the State and County use prewritten messages as much as possible, rather than writing new ones from scratch at the time of the emergency? If so, where are the prewritten messages to be found?
- b. If it were necessary to get a message to the public immediately advising them to shelter or evacuate, would the State and County consider broadcasting one of the messages in LILCO's emergency plan?

18. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 5 functions. Please provide copies of all such plans and procedures.

19. Please state each and every reason why Intervenor believe that their implementation of the Contention 5 functions as described in their responses to Interrogatories Nos. 10, 13, 15, 16, and 17 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenor claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Contention 6

20. With respect to the Contention 6 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Protective Action Recommendations

21. Unless the answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in determining, deriving, or deciding upon protective action recommendations in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenors raised in their Answer to 5 and 6 Motion at 24:
- a. Who would be responsible for determining, deriving, or deciding upon protective action recommendations? (Answer to 5 and 6 Motion at 24.)
  - b. How long would it take to locate the person or persons responsible for determining protective action recommendations and to provide those persons with "information" they believed "necessary and appropriate"? (Id.)
  - c. What "information" would the person or persons responsible for determining protective action recommendations require in order to determine protective action recommendations, and how would they obtain that "information"? (Id.)
  - d. What "criteria" would be used in determining protective action recommendations, and "how would those criteria be applied to information actually available in an emergency"? How long would this "process" take, and who would "perform" it? (Id.)

Command and Control

22. Unless the answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, or means which New York State and Suffolk County would use, undertake, or employ in order to assume and exercise command and control of an emergency response to a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 24:
- a. Who would be responsible for assuming and exercising command and control of the emergency response? (Answer to 5 and 6 Motion at 24.)
  - b. How long would it take to locate the person or persons responsible for assuming and exercising command and control of the emergency response and to provide those persons with "information" they believed "necessary and appropriate"? (Id.)
  - c. What "information" would the person or persons responsible for assuming and exercising command and control of the emergency response require in order to assume and exercise command and control, and how would they obtain that "information"? (Id.)

Management, Implementation, and Coordination

23. Unless your answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, or means which New York State and Suffolk County would use, undertake, or employ in order to manage, implement, and coordinate an emergency response to a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 24-25:



- a. Who would be responsible for managing, implementing, and coordinating the emergency response? (Answer to 5 and 6 Motion at 24.)
  - b. How long would it take to locate the person or persons responsible for managing, implementing, and coordinating the emergency response and to provide those persons with "information" they believe "necessary and appropriate"? (Id.)
  - c. What "information" would the person or persons responsible for managing, implementing, and coordinating the emergency response require in order to perform those functions, and how would they obtain that information? (Id.)
  - d. What "functions" would need to be managed, implemented, and coordinated during the emergency response? What "personnel" would need to be managed and coordinated during the emergency response? (Id. at 24-25.)
  - e. How would those persons responsible for managing, implementing, and coordinating the emergency response contact and communicate with all "necessary personnel" during the emergency response? How long would it take to establish that contact and perform those communications? (Id. at 25.)
24. Suffolk County and the State of New York have admitted that they would attempt to stay in contact with LILCO or LERO or both during a Shoreham emergency (LILCO's Statement of Material Facts, Mar. 20, 1987, ¶ 46). To the extent not already provided in your responses to Interrogatories No. 21-23 above, please answer the following:
- a. How would the County attempt to stay in contact?
  - b. How would the State attempt to stay in contact?
25. To the extent not already provided in your responses to Interrogatories Nos. 21-23 above, please answer the following questions with respect to the criteria the State and County would use to make protective action determinations for the plume exposure pathway (10-mile) EPZ:

- a. What criteria would be used to decide whether the public should evacuate?
  - b. What criteria would be used to decide whether the public should shelter?
  - c. Would the State and County use EPA's Protective Action Guidelines to make protective action recommendations?
  - d. Would the State use different criteria from the ones it would use for radiological emergencies at other nuclear plants? If so, please specify how the Shoreham criteria would differ.
26. To the extent not already provided in your responses to other of these Interrogatories, please identify what criteria and standards the State and County would use to make protective action recommendations for the ingestion exposure pathway (50-mile) EPZ.
27. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 6 functions. Please provide copies of all such plans and procedures.
28. Please state each and every reason why Intervenor believe that their implementation of the Contention 6 functions as described in their responses to Interrogatory Nos. 21-25 above would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenor claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

#### Contentions 1 and 2

29. With respect to the Contentions 1 and 2 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a

radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

30. Unless the answer to Interrogatory No. 29 is a simple no, please identify and describe the traffic control plans, strategies or techniques which the Suffolk County Police Department (SCPD) would implement during the evacuation of all or a portion of the EPZ in the event of a radiological emergency at Shoreham. Specifically, in Intervenor's Response in Opposition to LILCO's Motion for Summary Disposition of Contentions 1 and 2 (Feb. 10, 1988) (hereinafter "Response to 1 and 2 Motion") at 46-47 Intervenor states that "there are issues of fact regarding the nature and adequacy of a governmental 'best efforts' attempt at traffic control" and that "[a]mong the questions which must be addressed" are certain matters, which Intervenor then lists. In your response to this interrogatory please include answers to the following questions which Intervenor raised in their Response to 1 and 2 Motion at 46-47:

- a. What would be the "level of preparedness" of the SCPD and "relevant" County officials in attempting to implement traffic control? (Response to 1 and 2 Motion at 46.)
- b. What specific traffic control strategies would the SCPD implement and how would they be implemented? How long would it take to implement those strategies? (Id. at 47.)
- c. How many SCPD personnel would be required to implement the strategies identified in sub-part b above? How long would it take to mobilize sufficient SCPD personnel to implement the strategies identified in sub-part b above? (Id.)
- d. Could Suffolk County "coordinate" with "other response organizations"? Would Suffolk County "coordinate" with "other response organizations"? If so, what "other response organizations" would it "coordinate" with? How would the County and these "other response organizations" "coordinate"? (Id.)

31. The traffic posts and traffic movements to be encouraged and discouraged under the LILCO emergency plan are found in OPIP 3.6.3, Attachment 4. To the extent not already answered in your response to Interrogatory No. 30, please answer the following:

- a. Would Suffolk County and the State of New York send personnel to the posts listed in OPIP 3.6.3 if an evacuation of the Shoreham 10-mile EPZ were necessary?
- b. If not, which of the listed posts would not be manned, and which additional posts (not listed in OPIP 3.6.3) would be manned?
- c. Who would the State and County use to man the traffic posts identified in response to a and b above?
- d. In what order would the State and County dispatch police (or other personnel) to the traffic posts? For example, would the State and County try to man the posts in the order listed in Attachment 7 to OPIP 3.6.3, or randomly, or according to which police units were nearest which posts, or some other way? If "some other way," please describe it.
- e. How long would it take for the traffic posts to be fully manned by the State and County?
- f. Would the people manning the traffic posts for the State and County use the traffic control strategies (that is, the movements to be encouraged and discouraged and the channelization and traffic barrier placement) called for in the LILCO Plan? Which would the State and County use and which would the State and County not use?
- g. What traffic control measures would the State and County perform that are not called for in the LILCO Plan?
- h. If traffic were directed in accordance with your answers to b, f, and g above, would the evacuation times be greater than, less than, or the same as the evacuation times if the LILCO Plan were followed?
- i. Assuming LILCO Traffic Guides were stationed at traffic posts listed in OPIP 3.6.3, would Suffolk County traffic personnel (i) ignore them, (ii) send them away, (iii) use them as a source of information or help as needed, or (iv) something else? If the answer is something else, please specify what.

32. To the extent not already provided in your response to Interrogatory No. 30 above, please answer the following. If the answer differs for different times of the day or week, please answer for each time:

- a. How many uniformed police officers does Suffolk County employ? How many are on duty at any given time?
  - b. How many police vehicles driven by uniformed officers are on duty at any given time?
  - c. How many New York State Police vehicles driven by uniformed officers are on duty in Suffolk County at any given time?
33. To the extent not already provided in your response to Interrogatory No. 30 above, please indicate how many police vehicles driven by uniformed officers are on duty at any given time for each of the following police departments:
- a. Suffolk County Sheriff's Office
  - b. Riverhead Police Department
  - c. Southampton Police Department
  - d. Southold Police Department
  - e. Belie Terre Village Police Department
  - f. Old Field Village Police Department
  - g. Head of the Harbor Police Department
  - h. Nissequogue Police Department
  - i. Quogue Police Department
  - j. Westhampton Police Department
  - k. Parkway Police
34. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contentions 1 and 2 functions. Please provide copies of all such plans and procedures.

35. Please state each and every reason why Intervenor believe that their implementation of the Contentions 1-2 functions as described in their responses to Interrogatories Nos. 30-31 above would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenor claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Contention 10

36. With respect to the Contention 10 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.
37. Unless the answer to Interrogatory No. 36 is a simple no, please identify the processes, methods, or means which the Suffolk County Police Department (SCPD) would use, undertake, or employ to perform access control functions at the EPZ perimeter in the event of a radiological emergency at Shoreham. Specifically, in an attachment to Intervenor's Opposition to LILCO's Motion for Summary Disposition of Contention 10 (Access Control at the EPZ Perimeter) (Feb. 10, 1988) Intervenor list several "issues of material fact in dispute." With respect to these issues, in your response to this interrogatory please include answers to the following questions which Intervenor raised:
- a. Has the SCPD made any "plans or preparations" to implement access control? (Governments' Statement of Issues of Material Fact in Dispute.)
  - b. What "standards" would the "local authorities use for exclusion and over how wide an area"? (Id.)



- c. Would Suffolk County "interact" with other "response organizations"? If so, what other "response organizations" would it coordinate with? How would the County and these other "response organizations" coordinate? (Id.)
- d. How many SCPD personnel would be required to implement access control? How long would it take to mobilize SCPD personnel to implement access control? (Id.)
- e. Would the SCPD's response be affected by the absence of radiological protection training or equipment? If so, how would it be affected? (Id.)

38. To the extent not already provided in your response to Interrogatory No. 37 above, please answer the following:

- a. Would Suffolk County and the State of New York try to provide control of access to the Shoreham 10-mile EPZ if it had to be evacuated in a radiological emergency?
- b. Would the State and County provide access control during the evacuation? If so, would the State and County forbid people to enter the EPZ? If not, what would the "access control" consist of?
- c. Would the State and County provide access control after the EPZ had been evacuated? If so, why?
- d. Where would police (or other personnel) be stationed to provide access control? List all locations.
- e. How many personnel would be required to provide this access control?
- f. How long would it take Suffolk County and the State to have people in place to provide this access control?

39. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 10 functions. Please provide copies of all such plans and procedures.

40. Please state each and every reason why Intervenor believe that their implementation of the Contention 10 functions as described in their responses to Interrogatories Nos. 37-38 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenor claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Contention 4

41. With respect to the Contention 4 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.
42. Unless the answer to Interrogatory No. 41 is a simple no, please identify the processes, methods, or means which New York State and Suffolk County (SCPD) would use, undertake, or employ to remove obstructions from public roadways in the event of a radiological emergency at Shoreham. Specifically, in an attachment to Intervenor's Response in Opposition to LILCO's Motion for Summary Disposition of Contentions 4 and 9 (Feb. 10, 1988), Intervenor list several "material facts as to which there exists a genuine issue to be heard on matters raised by LILCO's Motion for Summary Disposition of Contentions 4 and 9." With respect to these "material facts," in your response to this interrogatory please include answers to the following questions which Intervenor raised:

- a. Who from New York State and Suffolk County would be in "overall charge" of an effort to remove road obstructions? Who would actually remove road obstructions and how would they remove them? (Statement of Material Facts.)
  - b. How would the removal of road obstructions be "coordinated with such other functions as guiding traffic and selecting alternate evacuation routes?" (Id.)
  - c. How would a decision to develop and implement a plan to remove road obstructions be implemented? How long would it take to implement such a plan? (Id.)
  - d. How long would it take to mobilize and dispatch personnel into the field to remove road obstructions? Would a "sufficient" number of qualified personnel be "available, willing, and able to implement a plan to remove road obstructions"? (Id.)
43. To the extent not already provided in your response to Interrogatory No. 42, please state how the State and County would remove road obstructions in a Shoreham emergency by answering the following:
- a. Would Suffolk County and New York State direct or permit LERO road crews to remove obstructions?
  - b. Other than LERO vehicles, what vehicles would the State and County use to remove obstructions?
  - c. How many such vehicles are available?
  - d. Where are these vehicles garaged? Provide addresses and the number of vehicles at each address.
  - e. Are these vehicles available to the State or County at all times? If not, when are they unavailable?
  - f. What personnel would the State and County use to remove obstructions?
  - g. Where are the drivers and other personnel needed to remove obstructions during ordinary business hours?
  - h. Where would the State and County station vehicles and personnel for the purpose of removing road impediments once a Shoreham emergency had begun?
  - i. If during a Shoreham emergency a LERO road crew were in a position to remove a road impediment materially faster than the State or

County could do it, would the State and County permit the LERO road crew to remove the impediment? If not, why not?

- j. How does Suffolk County remove road impediments ordinarily (that is, when there is no Shoreham emergency)? Does the County use county vehicles, privately owned tow trucks, or something else? Who owns these vehicles? (List owners and number of vehicles for each owner.) How many such vehicles are available to the County?
44. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 10 functions. Please provide copies of all such plans and procedures.
45. Please state each and every reason why Intervenors believe that their implementation of the Contention 4 functions as described in their responses to Interrogatories Nos. 42-43 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenors claim would prevent their "best efforts" response from satisfying applicable NRC requirements.

#### Contentions 7 and 8

46. State whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, will use LILCO's ingestion pathway and recovery and reentry procedures as set forth in the LILCO Plan. If the answer is no, state why New York State and Suffolk County would not use LILCO's procedures.
47. If the answer to Interrogatory No. 46 is no, state whether New York State and Suffolk County will use the New York State Radiological Emergency Preparedness Plan's (hereinafter "State Plan") procedures for an ingestion

pathway and recovery and reentry response to a Shoreham emergency. If the answer is yes, identify what portions of the State Plan would be used and whether that response would be adequate to satisfy the applicable regulatory requirements. If the answer is no, state why New York State and Suffolk County would not use the State Plan.

48. State whether New York State and Suffolk County would set up a recovery committee to direct all recovery and reentry activities in response to a Shoreham emergency. If the State and County would not set up such a committee, state what the State and County would do instead. If the State and County would set up such a committee, state who would be on the committee and what their responsibilities would be.
49. If New York State and Suffolk County would not use LILCO's or New York State's procedures, state what New York State and Suffolk County would do to provide for the following during a Shoreham emergency, as listed in the State Plan at IV 2-3:
  - (a) Sampling and monitoring of radiation and evaluation of data.
  - (b) Decontamination activities, including waste disposal.
  - (c) Security, including police and fire protection for affected areas.
  - (d) Medical service.
  - (e) Electric power and telephone communications.
  - (f) Food and water supply.
  - (g) Operability of sanitary systems.
  - (h) Transportation.
  - (i) Sources of heat.
  - (j) Condition and needs of the affected population.

50. Identify all plans and procedures that New York State has and would use, follow, or otherwise rely upon to make an ingestion pathway and recovery and reentry response to a radiological emergency at (a) the Yankee Rowe nuclear power plant (Massachusetts), (b) the Millstone nuclear power plant (Connecticut), (c) the Haddam Neck nuclear power plant (Connecticut), (d) the Vermont Yankee nuclear power plant (Vermont), and (e) the Oyster Creek nuclear power plant (New Jersey). Indicate which of the plans and procedures are site-specific rather than generic. Provide copies of all documents.
51. Identify, on a plant-by-plant basis, all counties in New York State that are located in the ingestion pathway EPZs of the nuclear power plants listed in Interrogatory No. 50.
52. Identify, on a county-by-county basis, all plans and procedures that the counties listed in response to Interrogatory No. 51 have or would use, follow, or otherwise rely upon for an ingestion pathway and recovery and reentry response to a radiological emergency at the nuclear power plants identified in Interrogatory No. 50. Indicate which of the plans and procedures are site-specific. Provide copies of all documents.
53. State, for the counties listed in response to Interrogatory No. 51 that do not have plans and procedures for an ingestion pathway and recovery and reentry response, how each such county would provide for an ingestion pathway and recovery and reentry response to a radiological emergency.



54. Identify all training sessions, drills, and exercises that have been or will be conducted by a county or by New York State to prepare for an ingestion pathway and recovery and reentry response to a radiological emergency at the nuclear power plants listed in Interrogatory No. 50. Identify which counties were or will be involved in each training session, drill, and exercise.
55. State whether New York State will participate in the FEMA-graded ingestion pathway exercise for the Yankee Rowe nuclear power plant ("Yankee Rowe Exercise"), that will be held in April 1988. Is New York State required by FEMA to participate in this exercise?
56. Identify the nature of New York State's participation in the Yankee Rowe Exercise. Include (a) the extent of the State's participation, (b) a list of the activities the State will be responsible for and the State personnel who will be responsible for each activity, and (c) a list of the State personnel who will participate in the exercise and the function each will serve in preparing for or participating in the exercise.
57. Identify, all plans, procedures, training materials, drill schedules, drill scenarios, and any other documents that the State has used or will use to prepare for and participate in the Yankee Rowe Exercise. Provide copies of all documents.
58. Identify each and every county in New York State that will be involved in preparing for and participating in the Yankee Rowe Exercise. For each county identify what activities that county will be responsible for and who at each county will be responsible for that activity.

59. Identify, on a county-by-county basis, all plans, procedures, training materials, drill schedules and scenarios, and any other documents that the counties identified in Interrogatory No. 58 will use to prepare for and participate in the Yankee Rowe Exercise. Identify which of these documents are site-specific. Provide copies of all documents.
60. Identify all training and drills that have been or will be conducted by the State and the counties identified in Interrogatory No. 58 in preparation for the Yankee Rowe Exercise. Identify and provide any documents concerning the training and drills.
61. State whether New York State and the counties and other pertinent jurisdictions in New York State within the 50-mile EPZ of Shoreham are capable of responding to a radiological emergency that requires ingestion pathway and recovery and reentry activities within the ingestion pathway EPZs of (a) the Millstone Nuclear Power Plant, (b) the Oyster Creek Nuclear Power Plant, (c) the Indian Point Nuclear Power Plant, and (d) the Haddam Neck Nuclear Power Plant and whether they have sufficient resources to undertake such a response. If the answer is yes, explain how New York State and the counties and other pertinent jurisdictions would respond and what resources they would use. Identify all plans and procedures that would be used and all documents showing that there are sufficient resources. State whether any of these plans, procedures, or other documents are site-specific to their locations.
62. Identify who of the Intervenor would be responsible for the emergency functions and activities identified in Interrogatory No. 49 during the recovery phase of a Millstone, Haddam Neck, Oyster Creek, or Indian Point radiological

- emergency. To the extent not already identified, identify all plans and procedures that would be used, followed, or otherwise relied upon. Provide copies of all documents.
63. Identify what emergency response functions and activities the following agencies would be responsible for during a Millstone, Haddam Neck, Oyster Creek, or Indian Point radiological emergency affecting the areas of New York State within the Shoreham 50-mile EPZ and state how those functions and activities would differ from the functions and activities which those agencies would have to perform to make an ingestion pathway and recovery and reentry response for Shoreham: (a) State Department of Health, (b) Department of Agriculture and Markets, (c) Departments of Environmental Conservation, (d) State Police, (e) Department of Transportation, (f) State Emergency Management Office (SEMO), and (g) the Radiological Emergency Preparedness Group (REPG).
64. Identify, on an item-by-item basis, what is different about Shoreham that prevents the State and the other counties and other pertinent jurisdictions in New York State within the 50-mile EPZ of Shoreham from using the same plans, procedures, and resources that are used for an ingestion pathway and recovery and reentry response to a Millstone, Haddam Neck, Oyster Creek, or Indian Point radiological emergency.
65. If it is true that New York State has sufficient resources to respond to an emergency at the Millstone, Haddam Neck, Oyster Creek, and Indian Point nuclear power plants that affects the areas of the State located within the Shoreham 50-mile EPZ, state why, at page 7 of the "Affidavit of James D.

Papile, James C. Baranski and Lawrence B. Czech" ("REPG Affidavit") supporting Intervenor's Response to LILCO's Motion for Summary Disposition of Contentions 7 and 8 (Feb. 10, 1988), REPG says "[t]he State has no sufficient resources to respond to a Shoreham emergency."

66. State whether the State and the counties and other pertinent jurisdictions within the 50-mile EPZ for Shoreham would respond in the same manner to a Shoreham emergency as they would to a radiological emergency at Millstone, Oyster Creek, Haddam Neck, or Indian Point. If the answer is no, explain why the State's and the counties' responses to a Shoreham emergency would not be the same and describe how they would be different.
67. Identify whether ingestion pathway and recovery and reentry activities have ever been coordinated between the State and Suffolk County and the utilities and offsite response organizations for Millstone, Oyster Creek, Haddam Neck, and Indian Point nuclear power plants. Identify any and all such activities. Identify all documents documenting these activities. Provide copies of all such documents.
68. Identify all county plans and procedures, and the specific sections and pages of those plans and procedures, that would be used by the following counties for an ingestion pathway and recovery and reentry response: Orange, Putnam, Wayne, Monroe, Westchester, Oswego, and Rockland. State whether the plans are used for each county only or for other counties. Identify any other counties for which such plans would be used.

69. Identify, on a plant-by-plant basis, each county in the ingestion pathway EPZs, but not in the plume exposure EPZs, of each operating nuclear power plant in New York. For each county, identify all county plans and procedures that would be used, followed, or otherwise relied upon by that county for an ingestion pathway and a recovery and reentry response to a radiological emergency. If the county does not have plans and procedures, state how they would respond.
70. Identify, on a county-by-county basis for each county in New York State in the ingestion pathway EPZ of a nuclear power plant, who in the New York State government is most knowledgeable about emergency preparedness of each county to make an ingestion pathway and recovery and reentry response.
71. For the areas of New York State within the 50-mile EPZ of Shoreham, identify who (a) in New York State government and (b) in the counties and other pertinent jurisdictions in those areas is most knowledgeable about the emergency preparedness of the counties and other pertinent jurisdictions in those areas to make an ingestion pathway and recovery and reentry response to a Millstone, Haddam Neck, Oyster Creek, and Indian Point radiological emergency.
72. For each county listed in Interrogatory No. 68 and identified in your response to No. 69, identify, for each of the following sub-parts, each county that has participated in (a) an ingestion pathway exercise, (b) any drills of ingestion pathway plans and procedures, (c) any training of ingestion pathway plans or procedures, (d) an exercise dealing with recovery and reentry activities, (e) in any drills of recovery and reentry plans and procedures, and (f) in any training of recovery and reentry plans and procedures. For each subpart, identify the

dates that that activity occurred, what plans and procedures were used, and who participated.

73. For each sub-part in Interrogatory No. 72, identify all documents containing documentation of the activities listed in Interrogatory No. 72. Provide copies of all such documents.
74. Identify, on a county-by-county basis for each county in New York State in an ingestion pathway EPZ of a nuclear power plant, the local offices of the State that are involved in responding to a radiological emergency. State what function they serve and the activities they are responsible for.
75. Is it the Intervenor's position that preparation, in the form of training, drills, and exercises, for a plume exposure response to a radiological emergency is adequate preparation for an ingestion pathway and recovery and reentry response?
76. Identify which counties in the ingestion pathway LPZ of the Ginna Nuclear Power Station were involved in preparing for the Ginna ingestion pathway exercise ("Ginna Exercise") held in October 1987. For each county describe the roles they played in preparing for and participating in the Ginna Exercise. Identify all documents used by these counties to prepare for and participate in the Ginna Exercise.
77. On a county-by-county basis for all counties except Wayne and Monroe, identify by date when the State and the counties identified in response to Interrogatory No. 76 (a) met to prepare for the Ginna Exercise, (b) trained for the Exercise, and (c) drilled in preparation for the exercise. Identify and provide all documents containing documentation of these events.



78. State for each county in the Ginna ingestion pathway EPZ whether each county's EOC was activated and whether it remained operational throughout the Ginna Exercise. For each county whose EOC was not activated or which did not remain operational throughout the exercise, explain who directed the county's operations and from where.
79. Do the Intervenor believe (see 10 C.F.R Part 50, App. E (F)(3)(e)) that it is sufficient to demonstrate at least once every five years the State's capabilities to make an ingestion pathway response through an exercise held at only one nuclear power plant site in the State? If the answer is no, state (a) for which sites in the State that the State's capabilities must be tested in a separate exercise and (b) whether the counties within the 50-mile EPZs of these sites must also participate in a FEMA-graded exercise to demonstrate their ability to make an ingestion pathway response.
80. If the answer to the first part of Interrogatory No. 79 is yes, state how a single ingestion pathway exercise, like the Ginna Exercise, demonstrates the ability of New York State and the counties in the ingestion pathway EPZs of the other nuclear power plants in the State to make an ingestion pathway response at any other nuclear power plant in the State.
81. If the Intervenor believe that the Ginna Exercise demonstrates the capabilities of the State and other counties to respond to an emergency at other nuclear power plants, state whether the Ginna Exercise demonstrates the capabilities of New York State and the counties and other pertinent jurisdictions in the Shoreham 50-mile EPZ to make an ingestion pathway response to a Shoreham emergency. If the answer is no, explain why not.

82. Do the Intervenor believe that for each nuclear power plant in New York State an ingestion pathway exercise must be conducted (a) to satisfy NRC requirements and (b) to demonstrate that the counties are adequately prepared for an ingestion pathway response? If no, explain why not.
83. Identify all documents critiquing the Ginna Exercise, including any informal reports, articles, or summaries prepared by the State, counties or utility; and draft FEMA post-exercise reports and the final FEMA post-exercise report. Provide copies of all such documents.
84. The REPG Affidavit at page 8 states: "From experience at other sites in New York State, we have learned that the only way the State and local government personnel have been able to develop adequate site specific response capabilities is through detailed planning, interfacing with personnel, drilling, and exercising." Identify the "other sites" and the "experience" referred to in the REPG Affidavit.
85. Identify, on a county-by-county basis for each county in New York State in a 50-mile EFZ of a nuclear power plant, the "routines" referred to on page 4 of the REPG Affidavit in the sentence "there are also many additional routines developed at the State and county level via close interaction of personnel which are not reflected in the generic State Plan or the county addenda." Identify any documents that contain these "routines." If the "routines" are site-specific to particular counties, identify the counties to which the routines apply. State whether these routines apply to all counties in New York State located in an ingestion pathway EPZ of a nuclear power plant. Provide copies of all identified documents.

86. State all the "general assumptions" referred to at page 5 of the REPG Affidavit that LILCO makes "about the New York State Plan and emergency planning which are unwarranted." For each assumption, state why it is unwarranted.
87. On a county-by-county basis for all counties in New York State located in an ingestion pathway EPZ of a nuclear power plant, identify the "detailed State and local government drills and exercises" referenced at the bottom of page 5 of the REPG Affidavit.
88. Identify the bases and actual experiences and activities that support the statement at page 6 of the REPG Affidavit "that the various counties respond very differently to ingestion pathway and recovery and reentry matters." Provide specific examples of (a) how the counties respond differently and (b) the implication of these differences.
89. Identify, on a county-by-county basis for all counties in New York State located within an ingestion pathway EPZ of a nuclear power plant, the "detailed, albeit somewhat informal procedures and techniques" reference at page 6 of the REPG Affidavit which "enhances the real framework for an integrated response." Identify and provide copies of all documents that contain these "procedures and techniques" for each county.
90. In discussing the proper protective response options available for making decisions about agricultural land on page 8 of the REPG Affidavit, REPG states that "substantial information is needed on soil conditions, crop rotations [and], water flow patterns . . . ." State (a) whether all of this information

was made available during the Ginna Exercise, (b) whether it was actually used during the Ginna Exercise, and (c) whether this information is kept updated for each county in New York State that is located in an ingestion pathway EPZ of a nuclear power plant. Identify, on a county-by-county basis, who is responsible for gathering and updating this information. If it is collected by State personnel, identify what local offices are responsible for this task and where this information is kept. Provide copies of all documents containing this information.

91. In reference to page 8 of the REPG Affidavit, identify for each county in New York State located in an ingestion pathway EPZ of a nuclear power plant (a) what county personnel "are needed to provide these data" (b) who according to "pre-planning" "will perform particular tasks," (c) what these "particular tasks" are, and (d) the training and evaluation of these personnel necessary to do these "particular tasks." Identify all documents containing this "pre-planning," training, and evaluation. Provide copies of all such documents.
92. Identify, on a county-by-county basis for all counties in New York State located in an ingestion pathway EPZ of a nuclear power plant, "the procedures, dedicated resources [and] trained personnel" that New York State has identified "for ingestion pathway data collection and analysis" referred to on page 9 of the REPG Affidavit. Provide copies of all such documents.
93. If the Intervenor believe that "[t]he level of training required for a proper ingestion pathway response is illustrated by preparation for the Ginna exercise" which "involved close to nine months," REPG Affidavit at 9-10, state whether the same type and amount of training and preparation has already

been conducted for all other counties in New York State in an ingestion pathway EPZ of a nuclear power plant. Identify which counties have been prepared to the (same or greater) extent. If the same type and amount of preparation has not been conducted with respect to any counties in New York State in an ingestion pathway EPZ of a nuclear power plant, state why such preparation has not been conducted and whether there are plans to do so.

94. State whether the counties in the Ginna ingestion pathway EPZ were capable of making an ingestion pathway response to a Ginna radiological emergency prior to this "close to nine months" of preparation identified on page 10 of the REPG Affidavit. If the answer is yes, explain why nine months of preparation was needed.
95. State whether the State will change its approach to planning for an ingestion pathway response in light of the two "important lessons learned as a result of the Ginna exercise" identified on page 10 of the REPG Affidavit. If yes, state what changes the State will make. If no, explain why changes will not be made.
96. Identify, on a county-by-county basis for each county in New York that is located in an ingestion pathway EPZ of a nuclear power plant, the location of the local cooperative extension offices that would participate in an ingestion pathway response.
97. Page 10 of the REPG Affidavit cites two "examples" of site-specific implementing procedures that concern an "adequate local communication network for use by the ingestion sampling teams," and "an adequate operations base for

the ingestion sampling teams." For each county in New York State that is located in an ingestion pathway EPZ of a nuclear power plant, identify (a) the "site-specific implementation procedures" for these two "examples," (b) who is responsible for implementing these procedures, and (c) any training or drills that have taken place concerning these procedures. Provide copies of all documents relating to these procedures and the training involving these procedures.

98. The REPG Affidavit at 10 says there are "detailed procedures" which go "beyond the generic Plan and county-specific addenda . . . which implement the tasks identified in the Plan." Identify, on a county-by-county basis for each county in New York State that is located in an ingestion pathway EPZ of a nuclear power plant, these detailed procedures, and state which tasks in the State Plan they are used to implement. Provide copies of all such documents.
99. State whether it would take nine months to a year for the counties in New York State in an ingestion pathway EPZ of a nuclear power plant to be prepared to make an ingestion pathway and recovery and reentry response that would be adequate to satisfy the applicable NRC requirements. If the answer is no, state how long it would take the counties to become prepared.
100. Identify when the State and County EOCs on Long Island have been activated in the past, why they were activated, what activities took place, and who was responsible for those activities.



101. Has New York State or Suffolk or Nassau County ever implemented their recovery procedures on Long Island in response to a man-made or natural disaster or emergency? If so, identify each occurrence. For each occurrence, identify (a) who in the State and County was involved in this response, (b) what roles they were responsible for, and (c) what activities took place.
102. If the "counties near Shoreham have not dedicated the resources or trained the personnel to support a state ingestion pathway response," REPG Affidavit at 12, state how they will support an ingestion pathway response to a Millstone, Haddam Neck, Oyster Creek, or Indian Point radiological emergency.
103. At page 11 of the REPG Affidavit it states that the State Plan does not define responsibilities "since the precise details of how a county can respond are only worked out in discussions" about how the counties can assist the State in an ingestion pathway response. For each county in New York State in an ingestion pathway EPZ of a nuclear power plant, state when the State has had these "discussions," who attended these "discussions," and, for each county, the "precise details" of the "assistance" that each county will provide the State in an ingestion pathway response. Identify when these "discussions" have been "refined" during "drills, table top exercises, and similar training sessions. . . ."
104. If the State and all the counties have not had these "discussions," state (a) why they have not occurred, (b) when they will occur, and (c) how the counties can be prepared at this time to assist the State in an ingestion pathway response if these "discussions" have not occurred.

105. In denying LILCO Material Fact No. 2 REPG states "the State and local government personnel who will be responsible for carrying out particular recovery and reentry and ingestion pathway functions are not primarily identified in the Plan." REPG Affidavit at 17. Identify these "unidentified" State and local government personnel who will be responsible for recovery and reentry activities for each county in New York State located within a 50-mile EPZ of a nuclear power plant.
106. In denying LILCO Material Fact No. 4 REPG states that "the State has not developed procedures that are applied generically to other plants. Rather, all procedures of the State are tailored to site-specific situations . . . ." If this statement is true, explain why the Intervenor admitted that the State has a "generic State plan" that is applied to all nuclear power plants. Identify "all procedures of the State that are tailored to site-specific situations" and identify those "site-specific situations."
107. State what additional ingestion pathway and recovery and reentry activities must be taken in response to a radiological emergency that require "detailed interfacing and practice sessions" that the LILCO Plan does not address. See REPG Affidavit at 18-19.
108. In response to LILCO Material Fact No. 8 REPG stated that even though the Monroe County Plan says the State Plan has complete instructions on recovery, the State Plan does not have complete instructions. REPG Affidavit at 19. Explain how the Monroe County Plan statement can be true. If it is only true "in context," please identify the context that makes it true.

109. Identify what "staff members" would [provide] the "local chief executive" of Suffolk County with "information and recommendations" about recovery operations during a Shoreham emergency. See REPG Affidavit at 19-20. Identify what information and recommendations are referred to here.
110. State what is the basis for the statement "any recovery committee which may be appointed is tailored to the specific site and to the specific details of the emergency." REPG Affidavit at 20. Give examples where this has been done during training, drills or exercises.
111. In response to LILCO Material Fact No. 14, REPG states that "a variety of other persons may have primary responsibility" for the activities identified in that Material Fact. REPG Affidavit at 20. Identify who these other people are, what their responsibilities would be, and what activities they would be responsible for.
112. Explain the Intervenor's "understanding [about] what actually would occur in Monroe County with respect to the County Executive" that is more "complex" than that indicated in LILCO Material Fact No. 17. REPG Affidavit at 21. Identify the detailed preparation and planning referenced in the REPG response excluding Monroe County's preparation for the 1987 Ginna Exercise.
113. In response to LILCO Material Fact No. 21, REPG states that the "State Department of Health is not the only agency that has responsibilities for analyzing all of the exposure pathways . . ." REPG Affidavit at 22. Identify on a county-by-county basis for each county in New York State in a 50-mile EPZ of a nuclear power plant all other agencies that have this responsibility.

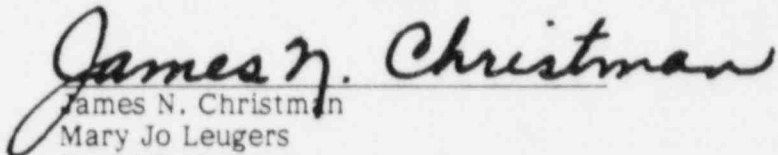
114. In reference to LILCO Material Fact No. 26, state what other factors would be considered before information about recovery actions would be disseminated to the public. See REPG Affidavit at 23.
115. In response to LILCO Material Fact No. 41, REPG states that "particular counties provide more or less support, depending on a [various] factors. . . ." REPG Affidavit at 26. On a county-by-county basis for each county in New York State located in a 50-mile EPZ of a nuclear power plant what "more or less support" is provided in comparison to that listed in LILCO Material Fact No. 41.
116. In response to LILCO Material Fact No. 54, REPG states that the Ginna Exercise tested "the State ingestion pathway procedure for local governments in the vicinity of Ginna only." State what parts of the State Plan were not tested during the Ginna Exercise and if the State plans to test these parts at another exercise.

Contentions 1-2, 4-8, 10

117. Identify and describe any and all portions of Suffolk County that are within the plume exposure EPZ of the Millstone Nuclear Power Plant in Connecticut.
118. Identify any and all plans and procedures that Suffolk County would use, follow, or otherwise rely upon to respond to a radiological emergency at the Millstone plant which required the implementation of protective measures, including, but not limited to, evacuation of the portions of Suffolk County identified in Interrogatory No. 117. Provide a copy of all such documents.

119. Who in the New York State government and who in the Suffolk County government are most knowledgeable about how the State and County would respond to a Shoreham emergency with respect to each of the following functions:
- a. guiding traffic
  - b. blocking roadways, erecting barriers in roadways, and channeling traffic
  - c. removing obstructions from public roadways, including towing private vehicles
  - d. activating sirens and directing the broadcasting of emergency broadcast system messages
  - e. making decisions and recommendations to the public concerning protective actions
  - f. making and implementing decisions and recommendations to the public concerning protective actions for the ingestion exposure pathways
  - g. making and implementing decisions and recommendations to the public concerning recovery and reentry
  - h. performing access control at the EPZ perimeter?
120. Please provide a copy of any and all existing plans and procedures for responding to emergencies, whether radiological or nonradiological, affecting Suffolk County, including, but not limited to, chemical spills, fires, hurricanes, explosions, and earthquakes. Please include any and all plans for dealing with accidents involving shipments of radiological materials to Brookhaven National Lab, the Shoreham Nuclear Power Station, hospitals and other medical facilities, and industrial facilities.

121. If Shoreham were in fact operating at 100 percent power, would (a) the State of New York and (b) Suffolk County do anything to improve their present state of preparedness to respond to a radiological emergency? If so, precisely what would (a) the State and (b) the County do?
122. With respect to New York State, how do the answers to Interrogatories Nos. 10, 13, 15, 16, 21, 22, 23, 30, 37, and 42 differ from what the State would do in a radiological emergency at other operating nuclear power plants in New York State?
123. To the extent not already requested, please provide all copies of all documents identified in response to the above interrogatories.

  
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DATED: March 24, 1988

RELATED CORRESPONDENCE

LILCO, March 24, 1988

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CERTIFICATE OF SERVICE

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

I hereby certify that copies of LILCO'S SECOND 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 were served this date upon the following by telecopier as indicated by one asterisk, by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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DATED: March 24, 1988

  
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