

RELATED CORRESPONDENCE

DOCKETED
March 28 1988

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 MAR 30 P2:12

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
BOOKETING & 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 SUPPLEMENTAL ANSWERS TO LILCO'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS REGARDING LILCO'S EMERGENCY BROADCAST SYSTEM

Suffolk County hereby supplements its responses to LILCO's First Set of Interrogatories and Requests for Production of Documents regarding LILCO's Emergency Broadcast System, dated February 24, 1988 ("First Request").

I. GENERAL RESPONSE

Suffolk County gives the same general responses and objections that it made in response to LILCO's First Request.

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II. SUPPLEMENTAL ANSWERS TO INTERROGATORIES
AND DOCUMENT REQUESTS

Identification of Witnesses

LILCO Interrogatory No. 1

1. Please identify each witness Intervenor expect to call to testify on any factors concerning EBS contentions 1.A, 1.B, 1.C, and 2.A, admitted by the Board in its February 22, 1988 Order. For each witness, other than experts, that Intervenor expect to call, state 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 expect to call as an expert witness, state 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.

Answer. On March 18, 1988, the County identified Charles G. Perry, III as a potential witness in the remanded EBS proceeding. Mr. Perry will likely testify concerning the coverage of LILCO's proposed EBS. As Mr. Perry made clear during his deposition on March 23, 1988, he has only recently begun to study and analyze LILCO's EBS, including its coverage. Therefore, at this time, Mr. Perry has not formed any specific opinions or conclusions concerning LILCO's EBS coverage.

LILCO Interrogatory No. 2

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

Answer. A copy of Mr. Perry's resume was produced to LILCO on March 18, 1988, and again on March 25, 1988.

LILCO Interrogatory No. 3

3. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on any matter concerning the adequacy and coverage capabilities of radio stations and, more specifically, the adequacy under NRC regulations of any EBS station or network intended to be used in the event of any nuclear or non-nuclear emergency to communicate emergency information to the public.

Answer. Mr. Perry has not appeared as a witness in any other proceeding on the subject topics.

LILCO Interrogatory No. 4

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

Answer. See Answer to Interrogatory No. 3 above.

LILCO Interrogatory No. 5

5. Please identify all articles, papers, and other documents authored or coauthored by each witness on the subject of the adequacy and coverage capabilities of radio stations and, more specifically, the adequacy under NRC regulations of any EBS station or network intended to be used in the event of any nuclear or non-nuclear emergency to communicate emergency information to the public.

Answer. Mr. Perry has authored no articles, papers or other documents on the issues relevant to this proceeding.

LILCO Interrogatory No. 6

6. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses, or other documents with respect to any of the following:
- (a) The broadcast coverage area of any radio station(s);
 - (b) The effect of geography, transmitter location, and reception antenna location on

- the broadcast signal and coverage capability of any radio station(s); and
- (c) The broadcast coverage capabilities required of any EBS radio station or system under NRC or FCC regulations.

Answer. Mr. Perry has not prepared or had prepared any studies, reports, analyses or other documents on the issues relevant to this proceeding.

LILCO Interrogatory No. 7

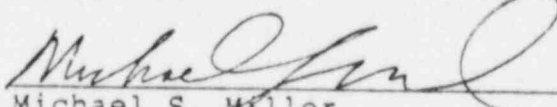
7. Unless the answer to Interrogatory 6 above is a simple negative, please identify and provide a copy of each document.

Answer. See Answer to Interrogatory No. 6 above.

OBJECTIONS STATED BY COUNSEL

All objections and assertions of privilege, or reference thereto, were stated by counsel.

E. Thomas Boyle
Suffolk County Attorney
Building 158 North County Complex
Hauppauge, New York 11788



Michael S. Miller
Michael J. Missal
KIRKPATRICK & LOCKHART
1800 M Street, N.W.
South Lobby - Ninth Floor
Washington, D.C. 20036-5891

Attorneys for Suffolk County

March 28, 1988

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CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S SUPPLEMENTAL ANSWERS TO LILCO'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING LILCO'S EMERGENCY BROADCAST SYSTEM have been served on the following this 28th day of March, 1988 by U.S. mail, first class, except as otherwise noted.

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

James P. Gleason, Chairman
513 Gilmoure Drive
Silver Spring, Maryland 20901

Dr. Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Fabian G. Palomino, Esq.
Richard J. Zahnleuter, Esq.
Special Counsel to the Governor
Executive Chamber, Rm. 229
State Capitol
Albany, New York 12224

Mr. Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

William R. Cumming, Esq.
Spence W. Perry, Esq.
Office of General Counsel
Federal Emergency Management Agency
500 C Street, S.W., Room 840
Washington, D.C. 20472

W. Taylor Reveley, III, Esq. *
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Joel Blau, Esq.
Director, Utility Intervention
N.Y. Consumer Protection Board
Suite 1020
Albany, New York 12210

E. Thomas Boyle, Esq.
Suffolk County Attorney
Bldg. 158 North County Complex
Veterans Memorial Highway
Hauppauge, New York 11788

Mr. L. F. Britt
Long Island Lighting Company
Shoreham Nuclear Power Station
North Country Road
Wading River, New York 11792

Ms. Nora Bredes
Executive Director
Shoreham Opponents Coalition
195 East Main Street
Smithtown, New York 11787

Alfred L. Nardelli, Esq.
New York State Department of Law
120 Broadway, 3rd Floor
Room 3-118
New York, New York 10271

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Mr. Jay Dunkleburger
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

David A. Brownlee, Esq.
Kirkpatrick & Lockhart
1500 Oliver Building
Pittsburgh, Pennsylvania 15222

Anthony F. Earley, Jr., Esq.
General Counsel
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

Ms. Elisabeth Taibbi, Clerk
Suffolk County Legislature
Suffolk County Legislature
Office Building
Veterans Memorial Highway
Hauppauge, New York 11788

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
Riverhead, New York 11901

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm.
1717 H Street, N.W.
Washington, D.C. 20555

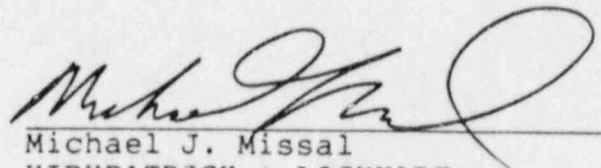
Hon. Patrick G. Halpin
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

Dr. Monroe Schneider
North Shore Committee
P.O. Box 231
Wading River, New York 11792

George E. Johnson, Esq.
Edwin J. Reis, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Mr. Stuart Diamond
Business/Financial
NEW YORK TIMES
229 W. 43rd Street
New York, New York 10036

Douglas J. Hynes, Councilman
Town Board of Oyster Bay
Town Hall
Oyster Bay, New York 11771



Michael J. Missal
KIRKPATRICK & LOCKHART
1800 M Street, N.W.
South Lobby - 9th Floor
Washington, D.C. 20036-5891

* By Telecopy