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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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) (Emergency Planning)

SOC'S RESPONSE TO LILCO'S MEMORANDUM OF SERVICE OF SUPPLEMENTAL EMERGENCY PLANNING INFORMATION

Shoreham Opponents Coalition ("SOC") joins with Suffolk County and the North Shore Coalition ("NSC") in moving the Licensing Board for an order striking from Long Island Lighting Co.'s ("LILCO's") May 26 submission all but that portion known as the "LILCO-LILCO" plan or the "transition" plan. The four other "plans" that were submitted on that date - the "LILCO-County plan," the "LILCO-NRC plan," the "LILCO-State plan," and the "LILCO-FEMA plan" - are devoid of legal or practical substance and thus were improperly submitted and cannot properly be be

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The premise that underlies LILCO's May 26 submission is that the parties to this proceeding must litigate the adequacy of any document which is characterized by the company as an emergency plan, regardless of whether the document was developed with the involvement, consent, or even the awareness of the entity that supposedly will carry it out. Given this premise, why is it that LILCO didn't also submit a "LILCO-Nassau plan"? Or perhaps a "LILCO-New York City plan"? Or a "LILCO-Red Cross plan"? The list of eligible entities is bounded only by LILCO's imagination.

We are here not to ponder outlandish hypotheticals, but to determine where there exists a state of emergency preparedness which will adequately protect the public health and safety in the event of an accident at Shoreham. LILCO may have the financial wherewithal to litigate the adequacy of its plan while simultaneously pressing four hypothetical alternatives upon the Board, but SOC does not. Even if these plans had a shred of merit, procedural fairness would require that each be litigated separately. But since they do not they must be stricken by the Board.

Respectfully submitted,

James B. Dougherty
3045 Porter St., NW
Washington, DC 20008
(202)362-7158

Counsel for SOC

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CERTIFICATE OF SERVICE

I certify that copies of the foregoing SOC'S RESPONSE TO LILCO'S MEMORANDUM OF SERVICE OF SUPPLEMENTAL EMERGENCY PLANNING INFORMATION were served, this 12th day of June, 1983, by deposit in the United States Mail, First Class, to the following:

James S. Laurenson, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington, DC 20555

Dr. Jerry A. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington, DC 20555

Dr. M. Stanley Livingston
1005 Calle Largo
Santa Fe, NM 87501

Edward M. Barrett, Esq.
Long Island Lighting Co.
250 Old Country Road
Mineola, NY 11501

Bernard M. Bordenick, Esq.
Office of Exec. Legal Director
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

ATTN: Docketing and
Service Section
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

W. Taylor Reveley, III, Esq.
Hunton & Williams
707 E. Main Street
P.O. Box 1535
Richmond, VA 23212

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Energy Research Group, Inc.
400-1 Totten Pond Road
Waltham, MA 12154

Herbert H. Brown, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
Washington, D.C. 20036

Brian McCaffrey
Charles Daverro
Long Island Lighting Co.
175 E. Old Country Road
Hicksville, NY 11801

David J. Gilmartin, Esq.
Attn: Patricia Dempsey, Esq.
County Attorney
Suffolk Co. Dep't of Law
Veterans Memorial Highway
Happauge, NY 11787

Steven B. Latham, Esq.
Twomey, Latham & Shea
33 West 2d Street
Riverhead, NY 11901

Mr. Stuart Diamond
Environment/energy writer
NEWSDAY
Long Island, NY 11747

Ralph Shapiro, Esq.
Cammer & Shapiro, P.C.
9 East 40th Street
New York, NY 10016

Howard Blau, Esq.
217 Newbridge Road
Hicksville, NY 11787

Cherif Sedky, Esq.
Kirkpatrick, Lockhart,
Johnson & Hutchison
1500 Oliver Building
Pittsburgh, PA 25222

MHB Technical Associates
1723 Hamilton Ave.
Suite K
San Jose, CA 95125

Nora Bredes, Exec. Coordinator
Shoreham Opponents Coalition
195 East Main Street
Smithtown, NY 11787

Daniel F. Brown, Esq.
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Comm'n
Washington, D.C. 20555

Jeffrey Cohen, Esq.
Deputy Commissioner & Counsel
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, NY 12223

James B. Dougherty