KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

1900 M STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 452-7000
CABLE: HIPHJ
TELEX 440206 HIPH UI
WRITER'S DIRECT DIAL NUMBER

(202) 452-7097

IN PITTSBURGH
KIRKPATRICK, LOCKHART, JOHNSON & HUTCHISON
1500 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 355-6500

July 27, 1983

BY MESSENGER

David A. Repka, Esq.
U. S. Nuclear Regulatory Commission
7735 Old Georgetown Road
Room 10205
Bethesda, Maryland 20814

Dear Dave:

I am enclosing a short list of informal discovery requests. We would appreciate receiving the responses of the NRC Staff as soon as practicable. In particular, the County needs to have answers to questions 1, 2, 5 and 6 by Friday of this week if it is to develop its scheduling proposals with regard to the Emergency Planning hearing.

In addition, copies of Suffolk County's responses to certain of LILCO's discovery requests inadvertently were not sent to you. They are enclosed with this letter.

If you have any questions related to discovery, please do not hesitate to call.

Sincerely,

John

John E. Birkenheier

Encls.

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PDR ADOCK 05000322
Q PDR

1. Identify each person whom the NRC Staff expects to call as an expert or non-expert witness during the Shoreham emergency planning hearings and state the subject matter on which each is expected to testify.

2. Identify all contractors retained by the Staff, or which the Staff currently intends to retain, to review, analyze or comment upon the LILCO Transition Plan or any offsite emergency plan for the Shoreham plant. What is the schedule for such review and analysis?

3. Provide copies of any evaluations, reviews and/or analyses of the adequacy, implementability and effectiveness of the LILCO Transition Plan and/or the OPIPs performed by or on behalf of the Staff or its contractors. Identify the criteria used to evaluate the LILCO Transition Plan and the OPIPs, if any. None

None of 0654 They have

4. Provide copies of the final report, supporting documents and analyses, supporting data, and any other documentation relating to Wilbur Smith and Associates, An Evacuation Time Assessment of Nine Nuclear Power Plants Emergency Planning Zones, Program Report, Contract No. EMW-C-0258, June, 1980, Vol. IX Shoreham Nuclear Power Plant Evacuation Time Assessment. If not described in the requested materials, please describe the methodology by which the evaluation was conducted.

5. Identify each FEMA representative whom the Staff expects to call as a witness during the Shoreham emergency planning hearings and state the subject matter on which each is expected to testify.

6. Provide the names of the Argonne National Laboratory personnel who performed, participated in, or reviewed the results of the Argonne review of the Transition Plan at the request of FEMA. Also, provide the names of the FEMA representatives who requested, directed, participated in, reviewed, critiqued, or commented upon, the Argonne review or the report documenting the results.

7. What is the schedule for the Staff's review of the Shoreham PRA dated July 1983? Identify the Staff personnel who are, or will be, involved in such review. Provide copies of all documents which relate to such review.

8. Identify all contractors retained by the Staff, or which the Staff intends to retain, to review, analyze or comment upon the Shoreham PRA dated July 1983.

KIRKPATRICK LOCKHART HILL CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N.W.

WASHINGTON, D.C. 20036

TELEPHONE (202) 452-7000
CABLE: HIFRI
TELEX 440306 HIFR UI
WRITER'S DIRECT DIAL NUMBER

(202) 452-7097

IN PITTSBURGH
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INFORMAL DISCOVERY REQUESTS TO NRC STAFF

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