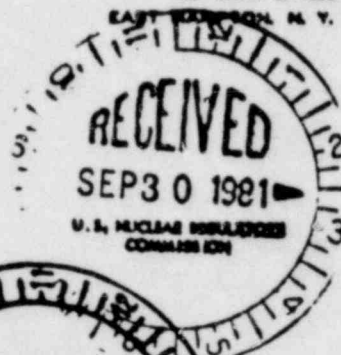


TWOMEY, LATHAM & SCHMITT  
ATTORNEYS AT LAW  
P. O. BOX 398  
33 WEST SECOND STREET  
RIVERHEAD, N. Y. 11901  
816 727-5180

THOMAS A. TWOMEY, JR.  
STEPHEN B. LATHAM  
TAS SCHMITT\*  
ROBERT S. PRICE  
CHRISTOPHER B. KELLEY  
\* ADMITTED IN N.Y. & FLA.

September 25, 1981

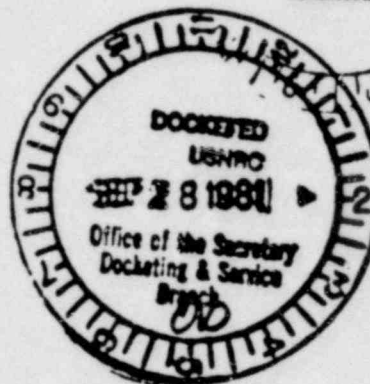
10 MAIN STREET  
EAST RIVERHEAD, N. Y. 11937



Louis J. Carter, Chairman  
Administrative Judge  
23 Wiltshire Road  
Philadelphia, Pa. 19151

Mr. Frederick J. Shon, Member  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555

Dr. Oscar H. Paris, Member  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Comm.  
Washington, D.C. 20555



Re: 50-322-CP

Dear Board Members:

Enclosed is SOC's "Statement of Contentions Pursuant To 10 CFR Section 2.714, With Respect To The Application For A Construction Permit Extension" and "Motion Pursuant To 10 CFR Section 2.714 To Supplement Contentions With Respect To The Application For An Operating License. Copies have been served on all parties in Docket 50-322.

SOC deferred the submission of this document in view of the resumption of informal discussions among SOC, LILCO and Staff in mid-August. A number of the issues raised by SOC in its original "Petition To Institute Proceedings" (January 23, 1981), particularly those issues now listed in part II of the enclosed document, are the subject of ongoing discussions and particularization by SOC, LILCO and Staff. However, in view of the possibility that those discussions will not lead to ultimate (or timely) stipulation on the issues

DS03  
1/1

to be litigated in the OL proceeding, and in view of SOC's belief that the enclosed document provides independent grounds for the admission in the CP or OL proceedings of the contentions contained therein, SOC is submitting them for the Board's consideration at this time.

SOC, Staff and LILCO have previously reached an oral agreement on the time for responding to the enclosed contentions. Staff and LILCO will respond to this filing in 20 days (October 15); SOC will submit any reply by October 25; and the parties hope that the Board will decide the issues as soon thereafter as is practicable.

As the Board is aware, informal discussions, discovery, particularization and resolution of contentions by the parties is continuing. It is conceivable that those discussions may affect the contentions which have been submitted in the enclosed document. Should that occur, the parties will immediately notify the Board of that fact.

Sincerely,

Steve Latham

SL:jo  
enc.

cc: All parties