

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 MAR 29 P2:57

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY) Docket No. 50-322
)
(Shoreham Nuclear Power Station,)
Unit 1))

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the intervenors, Shoreham Opponents Coalition and Suffolk County, by their attorneys, will take the deposition upon oral examination of certain individuals to be designated by LILCO, a party to these proceedings, on the subject areas set forth on Attachment A, pursuant to CFR 2.740(a) before a Notary Public, or before some other authorized officer, at the H. Lee Dennison Building in the Hamlet of Hauppauge, Township of Smithtown, County of Suffolk, State of New York 11788 on the 31st day of March, 1982, at 9:00 o'clock A.M. and from day to day thereafter until the examination is completed.

Dated: March 25, 1982
Riverhead, New York

Yours, etc.,

TWOMEY, LATHAM & SHEA

By Stephen B. Latham
Stephen B. Latham
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Shoreham Opponents Coalition
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KIRKPATRICK, LOCKHART, HILL
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By Lawrence Coe Lanpher by Stephen Jackson
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1900 M. Street, N.W., 8th Floor
Washington, D.C. 20036

TO: W. Taylor Reveley, Esq.
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Attorneys for LILCO
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

cc: 50-322 Service List

ATTACHMENT A

LILCO is hereby requested to make available the individual(s) with specific knowledge of the following subject areas as they pertain to the Shoreham project:

1. The methodologies, standards, regulations or other criteria used to determine the classification of systems and components important to safety with regard to the NSSS and balance of plant systems.

2. The scope, objectives, methodology, description of research and analytical tasks involved in the probabilistic risk assessment (PRA) currently being performed for LILCO by Science Applications, Inc. as well as LILCO's intended utilization of the PRA.

3. Any systems interactions, studies or analyses performed by LILCO or at LILCO's direction pertaining to the Shoreham project, whether computer or calculational analyses or actual physical walkdowns of one or more Shoreham systems.

4. LILCO's response to NRC Staff concerns on BWR water-level indication system (citation will be provided).

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PROPOSED STIPULATION AND ORDER

In a conference call on Friday afternoon, March 19, 1982, the Licensing Board issued various rulings concerning a Motion to Compel Discovery, filed by the Shoreham Opponents Coalition, on March 18, 1982. Counsel for SOC and LILCO have discussed their respective understandings of the Board's oral rulings and have agreed that the following information shall be produced:

1. With regard to SOC's Interrogatory No. 8 on Contention 3, LILCO will produce a list of equipment located in the secondary containment as referenced in that interrogatory, if such a list exists. In the alternative, LILCO will produce current systems drawings for the eleven subject areas contained in Contention 3, except for those subject areas where LILCO is requesting a waiver from Reg. Guide 1.97.

2. With regard to SOC's Contention 19 Interrogatories, Interrogatory 1, LILCO will specify, for each Regulatory Guide in the contention, the provisions of the regulatory positions in each Regulatory Guide with which LILCO does not comply. For each area of noncompliance identified in response to Interrogatory 1, LILCO

will answer SOC's Interrogatories 3(a) and 3(b). LILCO will also provide documents pursuant to Interrogatory 3(c) to the extent that such documents exist to support their answers to Interrogatories 3(a) and 3(b). LILCO will serve the answers to the Contention 19 Interrogatories by April 1, 1982 (in hand).

3. With regard to SOC's request for a site visit for its consultant, Richard Hubbard, it is SOC's current belief that no special site visit need be arranged for Mr. Hubbard other than the site visit currently contemplated by the Board on April 13, 1982. LILCO has been advised by SOC, however, that Mr. Hubbard may have one or more areas of special concern beyond the areas of interest to the Board that he will wish to include in his April 13 site visit. SOC believes that all of his concerns can be accommodated within the time allotted by the Board for its visit.

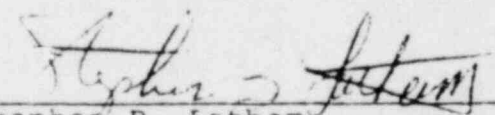
On March 22, 1982, counsel for Suffolk County submitted a "Joint Filing Regarding Submission of Prefiled Testimony". Attached to that filing was a handwritten note "Proposed Schedule For Submission Of Testimony" in which Suffolk County and SOC requested that joint Contention 7(b) and SOC Contention 19(b) be filed on May 4, 1982, rather than on April 13, 1982. At a conference call on March 23, 1982, the Board denied that request. However, SOC asked for reconsideration of that ruling as it pertained to the filing of testimony on Contention 19(b). The

Board agreed to defer the filing of testimony on SOC Contention 19(b) until May 4, 1982 in the event agreement to that deferral could be obtained by the other parties.

Counsel for SOC has spoken to the attorneys for Suffolk County, LILCO and NRC Staff and secured their agreement. Accordingly, Suffolk County and SOC will file their testimony on Contention 7(b) on April 13, 1982, while testimony on SOC Contention 19(b) will be filed on May 4, 1982. The May 25, 1982 filing dates for Staff and LILCO testimony on Contention 7(b) and 19(b) remain unchanged.

Counsel for SOC has read this proposed Stipulation and Order to counsel for NRC Staff, LILCO and Suffolk County and those parties agree with its submission to the Board.

Respectfully submitted,

By 
Stephen B. Latham
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Attorneys for the
Shoreham Opponents Coalition
33 West Second Street
Riverhead, New York 11901

Dated: March 25, 1982
Riverhead, New York