

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

\*82 APR -5 AM 11:17

In the Matter of )

LONG ISLAND LIGHTING COMPANY )

(Shoreham Nuclear Power Station, )  
Unit 1) )

Docket No. 50-322 O.L.

RELATED DOCUMENTS

SUFFOLK COUNTY DISCOVERY REQUESTS  
TO THE NRC STAFF ON CONTENTIONS 16 AND 20

Pursuant to the Licensing Board's March 15, 1982 Memorandum and Order, Suffolk County hereby propounds document requests and interrogatories on the NRC Staff. With respect to the interrogatories, Suffolk County requests the Presiding Officer to find that answers to the interrogatories are necessary to a proper decision and are not reasonably obtainable from any other source and to require the Staff to respond. See 10 C.F.R. § 2.720(h)(2)(ii).

Contention 16

1. Describe in detail the results of the NRC's review of the adequacy of LILCO's Emergency Operating Procedures for the ATWS event. Provide copies of all documents which relate to this NRC review.
2. Describe in detail the results of the NRC's review of LILCO's ATWS operator training program. Provide copies of all documents which relate to this NRC review.

3. Has the NRC verified the adequacy of the Recirculation Pump Trip system at Shoreham? Provide details of such verification review including copies of all documents relating thereto.
4. Provide a complete listing of ATWS-related modifications that LILCO has committed to complete at Shoreham. Identify which have been completed and the status of the NRC's review of each.
5. Provide (or identify where available) a complete description of NRC Staff recommendations on plant modifications made to the Commission in September 1980, as referenced in the Shoreham SER, p. 15-6. Identify which (if any) such recommendations have not been committed to be implemented at Shoreham.
6. Does the Staff agree that it would be feasible to incorporate an automatically initiated, totally redundant standby liquid control system at Shoreham that meets the single failure criterion? If not, describe why not. If so, does the Staff believe such upgrade of the SLCS should be accomplished? Provide the basis for the Staff's position.

#### Contention 20

1. Identify all reviews and analyses performed by the NRC Staff to determine that (a) the Dresden simulator, and/or (b) the Limerick simulator, are adequate for

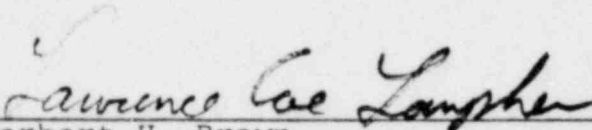
3.

purposes of training Shoreham operators. Provide all documents concerning such reviews and analyses and the results thereof.

2. Provide all documents, including reports, comments, analyses and descriptions, prepared by the NRC Staff or by any person, concerning the simulator demonstration conducted at the Limerick plant on October 16, 1981.

Respectfully submitted,

DAVID J. GILMARTIN  
Suffolk County Attorney  
PATRICIA A. DEMPSEY  
Assistant Suffolk County Attorney  
Suffolk County Department of Law  
Veterans Memorial Highway  
Hauppauge, New York 11788

  
\_\_\_\_\_  
Herbert H. Brown  
Lawrence Coe Lanpher  
Karla J. Letsche  
KIRKPATRICK, LOCKHART,  
HILL, CHRISTOPHER & PHILLIPS  
1900 M Street, N. W. - 8th Floor  
Washington, D. C. 20036  
(202) 452-7000

Attorneys for Suffolk County

April 1, 1982

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)

CERTIFICATE OF SERVICE

I hereby certify that copies of the "SUFFOLK COUNTY INTERROGATORIES AND DOCUMENT REQUESTS ON SUFFOLK COUNTY CONTENTIONS 16 AND 20," and the "SUFFOLK COUNTY DISCOVERY REQUESTS TO THE NRC STAFF ON CONTENTIONS 16 AND 20," dated April 2, 1982, have been served to the following by U.S. Mail, first class, this 2nd day of April, 1982 except as otherwise noted:

Lawrence Brenner, Esq. (\*)  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. James L. Carpenter (\*)  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Peter A. Morris (\*)  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Edward M. Barrett, Esq.  
General Counsel  
Long Island Lighting Company  
250 Old Country Road  
Mineola, New York 11501

Mr. Brian McCaffrey  
Long Island Lighting Company  
175 East Old Country Road  
Hicksville, New York 11801

Ralph Shapiro, Esq.  
Cammer and Shapiro  
9 East 40th Street  
New York, New York 10016

Howard L. Blau, Esq.  
217 Newbridge Road  
Hicksville, New York 11801

W. Taylor Reveley III, Esq. (#)  
Hunton & Williams  
P.O. Box 1535  
Richmond, Virginia 23212

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

Stephen B. Latham, Esq. (#)  
Twomey, Latham & Shea  
Attorneys at Law  
P.O. Box 393  
33 West Second Street  
Riverhead, New York 11901

Marc W. Goldsmith  
Energy Research Group, Inc.  
400-1 Totten Pond Road  
Waltham, Massachusetts 02154

Joel Blau, Esq.  
New York Public Service Commission  
The Governor Nelson A. Rockefeller  
Building  
Empire State Plaza  
Albany, New York 12223

David H. Gilmartin, Esq.  
Suffolk County Attorney  
County Executive/Legislative Bldg.  
Veteran's Memorial Highway  
Hauppauge, New York 11788

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Bernard M. Bordenick, Esq. (\*)  
David A. Repka, Esq.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

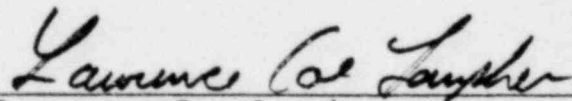
Mr. Jeff Smith  
Shoreham Nuclear Power Station  
P.O. Box 618  
North Country Road  
Wading River, New York 11792

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

Hon. Peter Cohalan  
Suffolk County Executive  
County Executive/Legislative  
Building  
Veteran's Memorial Highway  
Hauppauge, New York 11788

Ezra I. Bialik, Esq.  
Assistant Attorney General  
Environmental Protection Bureau  
New York State Department of  
Law  
2 World Trade Center  
New York, New York 10047

Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555

  
Lawrence Coe Lanpher  
KIRKPATRICK, LOCKHART, HILL,  
CHRISTOPHER & PHILLIPS  
1900 M Street, N.W., 8th Floor  
Washington, D.C. 20555

April 2, 1982

(\*) By Hand, April 2, 1982  
(#) By Federal Express, April 1, 1982