

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

SUFFOLK COUNTY'S FIRST REQUEST FOR
PRODUCTION OF EMERGENCY PLANNING
DOCUMENTS TO THE STATE OF NEW YORK

Pursuant to 10 C.F.R. § 2.741, and the Licensing Board's Order, dated April 20, 1982, the State of New York is requested by Suffolk County to produce each of the documents set forth below, within thirty (30) days after service hereof. These document requests pertain to the emergency planning and preparedness issues under consideration by the Licensing Board and to whether emergency planning and preparedness for the Shoreham facility complies with 10 C.F.R. § 50.47 and 10 C.F.R. Part 50, Appendix E.

DEFINITIONS AND INSTRUCTIONS

- A. Wherever appropriate, the singular form of a word shall be interpreted as plural and vice versa.
- B. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope hereof any information (as defined herein) which might otherwise be construed to be outside the scope of these discovery requests.

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C. Wherever appropriate, the masculine form of a word shall be interpreted as feminine and vice versa.

D. The term "person" includes any natural person, firm, partnership, educational institution, joint venture, corporation, and any domestic government organization, or group of natural persons or such entities.

E. The term "information" shall be expansively construed and shall include facts, data, theories, analyses, opinions, images, impressions, concepts and formulae.

F. The term "document" shall be expansively construed and shall mean any tangible thing from or on which information can be stored, recorded, processed, transmitted, inscribed, or memorialized in any way by any means regardless of technology or form. Each copy of a document which contains separate notations or writings thereon, and each draft of a document which differs in any way from the final version of the document, shall be deemed to be a separate document for purposes of these discovery requests. [Versions of a document which differ in clearly nonsubstantive and unimportant ways from other versions of the document do not need to be considered a separate document.]

G. The term "communication" includes every exchange of information by any means.

H. The term "LILCO," or "LILCO personnel" means Long Island Lighting Company, and any affiliate, agent, employee, consultant, contractor, subcontractor, technical advisor, representative, or other person acting for or on behalf of LILCO, or at LILCO's direction or control, or in concert with LILCO or assisting LILCO.

I. The term "Shoreham" means the Shoreham Nuclear Power Station, Unit 1, any part thereof, or any structure, system, component, instrumentation, equipment, or materials included in, or intended to be included in or associated with Shoreham, whether onsite or offsite.

J. The term "contractor" means any person, not affiliated with LILCO, who performed work relating to Shoreham, on behalf of LILCO and/or pursuant to a contract with LILCO. The term "subcontractor" means any person, not affiliated with LILCO, who performed work of any kind relating to Shoreham, on behalf of a contractor with whom the person was not affiliated, and pursuant to a contract with such contractor. A person other than a contractor who contracts with a subcontractor shall be deemed a subcontractor.

K. The words "concerning," "concerns," or any other derivative thereof include referring to, responding to, relating to, pertaining to, connected with, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

L. If the State of New York objects to or claims a privilege (attorney-client, work product, or otherwise), with respect to any document request, in whole or in part, or seeks to withhold documents or information because of the alleged proprietary nature of the data, set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Licensing Board to determine the validity of your objection or claim of privilege. This description should include with respect to each document: the author, addressor, addressee, recipients of indicated and "blind" copies, date of preparation, subject matter, purpose for which it was prepared, number of pages, attachments or appendices, all persons to whom distributed, shown or explained, present custodian, all persons believed to have a copy of the document, and the nature of the privilege or objection asserted.

M. If any document called for herein has been destroyed, that document is to be identified as described in the second sentences of "L", above. The State of New York also is requested to state the date of destruction, person authorizing destruction, and person destroying the document.

N. Information furnished in answer to a document request may be furnished by reference to the answer provided for another document request, provided the other referenced answer fully responds to each request for information contained in the

request. Separate answers should be provided for each request and each subpart thereof. The County is interested in receiving the relevant data asked for and any means of providing such data which are less time-consuming for the responder but which are nevertheless complete and fully understandable will satisfy the intent of these requests.

O. As used herein:

- (1) The term "plan" or emergency response plan shall refer to the Shoreham Emergency Plan as described in SNRC 568, dated May 27, 1981, and SNRC 656, dated January 11, 1982.
- (2) "Analysis" means research, investigation, audit, inspection, review, testing, monitoring, or any other method or form of examining data and/or forming conclusions or recommendations.
- (3) "NRC" means the Nuclear Regulatory Commission and its staff, any division or section thereof, any staff member thereof, or any agent, consultant, contractor, subcontractor, technical advisor, employee, or representative of the NRC.

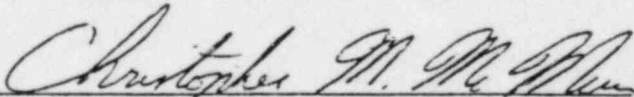
DOCUMENT DISCOVERY

1. All correspondence with any officers, employees, or representatives of the Long Island Lighting Company concerning emergency preparedness for the Shoreham Nuclear Power Station.
2. All documents reflecting any meetings or contacts with any LILCO officers personnel, contractors, subcontractors or other such representatives including, but not limited to:
 - a. The dates of such contacts.
 - b. Those individuals present during such contacts.
 - c. All matters discussed during such contacts.
3. All documents, analyses, studies or other such materials prepared by or for the State of New York concerning site-specific emergency planning for the Shoreham Nuclear Power Station, including, but not limited to:
 - a. Documents studying, analyzing, discussing or otherwise concerning the content or the adequacy of the radiological emergency response plan prepared by the Long Island Lighting Company.
 - b. All documents studying, analyzing, discussing or otherwise concerning the content or adequacy of any efforts made on the part of Suffolk County for emergency preparedness with regard to the Shoreham Nuclear Power Station.

4. All documents, maps, figures, tables, drawings, or other such materials, in draft or final form, prepared to date for or by the State of New York, concerning site-specific planning for the Shoreham Nuclear Power Station, including but not limited to, all such materials which will or may be included in the New York State Radiological Emergency Preparedness Plan.
5. All correspondence by the State of New York or any agency thereof with the Nuclear Regulatory Commission or the Federal Emergency Management Agency regarding emergency preparedness for Shoreham.
6. All documents reflecting plans for exercises or drills to test emergency preparedness for the Shoreham Nuclear Power Station.

Respectfully submitted,

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May 11, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "SUFFOLK COUNTY'S FIRST REQUEST FOR PRODUCTION OF EMERGENCY PLANNING DOCUMENTS TO THE STATE OF NEW YORK," dated May 11, 1982, have been served to the following on May 11, 1982 by U.S. Mail, first class, except as otherwise noted.

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May 11, 1982

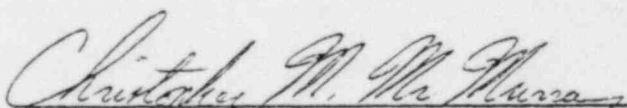
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