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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-\$22 (OL)

(Security)

LILCO's Response in Opposition to Suffolk County's Request for an Additional Authorized Secretary

On April 28, 1982, Suffolk County filed a motion to add an additional secretary to the list of persons authorized access to safeguards information related to the Shoreham plant. Prior to filing this motion, County counsel requested approval for such an addition from counsel for LILCO. It is LILCO's understanding that Michael S. Miller is now lead counsel for the County on security matters and thus it would be convenient to have his secretary, Ms. Pinto, authorized access to safeguards information. LILCO agreed to add Ms. Pinto to the list of authorized persons provided the previously authorized secretary, Mrs. Kramer, was removed from the list. The County rejected that offer and insisted that both secretaries be given access. LILCO objects to this unnecessary expansion of access to safeguards information.

The Company is seriously concerned that the confidentiality of safeguards information may be jeopardized by the number of $\mathcal D$ persons authorized to see it. The County already has eight such

8205050453 820429 PDR ADOCK 05000322 PDR persons: four attorneys (Messrs. Brown, Lanpher and Miller, and Ms. Dempsey), three consultants (Messrs. Goldsmith, White and Jenkins) and one secretary (Mrs. Kramer). If the County intended to limit its request for access to just this one additional secretary, the risk of inadvertent disclosure of sensitive information might not be substantially increased. But the County does not intend to stop here. Counsel for SC has informed LILCO that they intend to request access for two additional consultants, several members of the Suffolk County police force (the number five was mentioned) and a Deputy County Executive. This would bring the total number of persons authorized access to 17.

LILCO believes the Board must draw the line somewhere and that point has been reached. The inconveniences caused by having limited access to safeguards information must be accepted to ensure that this sensitive information is not inadvertently compromised.

LILCO suggests that the matter of access to safeguards information be taken up at the hearings during the week of May 4.

Respectfully submitted,
LONG ISLAND LIGHTING COMPANY

T. S. Ellis, III

Anthony F. Earley, Jr.

Hunton & Williams 707 East Main Street Richmond, Virginia 23219

DATED: April 29, 1982

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

I hereby certify that copies of LILCO'S RESPONSE
IN OPPOSITION TO SUFFOLK COUNTY'S REQUEST FOR AN ADDITIONAL
AUTHORIZED SECRETARY were served upon the following people
by first-class mail, postage prepaid, or by hand (as indicated
by an asterisk), on April 29, 1982.

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U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Peter A. Morris*
Administrative Judge
Atomic Safety and Licensing
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Dr. James H. Carpenter*
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Secretary of the Commission U.S. Nuclear Regulatory Commission Washington, D.C. 20555 Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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DATED: April 29, 1982