

LILCO, May 13, 1982

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF GENERAL
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

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

WHETHER SC 32 AND SOC 19(i)
ARE RIPE FOR FILING ON MAY 25

1. Until yesterday, counsel for LILCO were unaware that the Staff, County and SOC believe that they lack sufficient information to file testimony by May 25 on SC 32 and SOC 19(i).

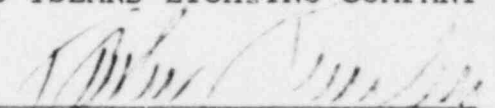
2. Discussions since then have not wholly resolved (a) what exactly it is these parties want, the Staff in particular, (b) whatever it is they want, whether that information would materially affect resolution of the contentions, and (c) when the Company first became aware (if before yesterday) that something material (if anything) might be missing.

3. Given this confusion, we lack the facts to know whether good cause exists to find SC 32 and SOC 19(i) unripe for filing on May 25. Accordingly, as Mr. Lanpher recited in his Motion to Defer of May 12, "LILCO takes no position regarding this motion." As a practical matter, if the Staff, County

and SOC have all concluded that they lack sufficient information to go forward on May 25, that would seem to resolve the issue, given the imminence of the 25th. In light of the present scope and pace of this proceeding, there will inevitably be some belated discoveries of the sort in question. We hope there will not be many.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY



W. Taylor Reveley, III

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DATED: May 13, 1982

LILCO, May 13, 1982

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

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CERTIFICATE OF SERVICE

I hereby certify that copies of LILCO'S (1) MOTION TO STRIKE THE MINOR TESTIMONY ON SC 28(a)(iii)/SOC 7A(3), (2) CROSS-EXAMINATION PLAN ON MR. MINOR'S TESTIMONY, (3) CORRECTIONS AND ADDITIONS TO THE HILL TESTIMONY ON SC 10, (4) COUNTY ACCESS TO SECURITY PLAN, and (5) COMMENTS ON THE RIPENESS OF SC 32 and SOC 19(i), were served upon the following people by first-class mail, postage prepaid, on May 13, 1982, except for those people indicated by an asterisk who were served by hand on that date, and except that for Item (2) above which went only to the Board:

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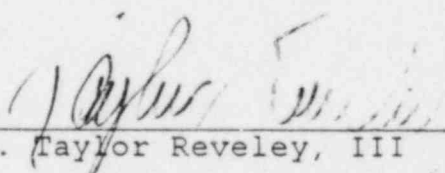
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DATED: May 13, 1982