MORGAN, LEWIS & BOCKIUS

PHILADELPHIA NEW YORK HARRISBURG COUNSELORS AT LAW
IBOO M STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE: (202) 872-5000

MIAMI
PARIS
ASSOCIATED OFFICE

GEORGE L. EDGAR

May 24, 1982

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

> In re: Long Island Lighting Company (Shoreham Nuclear Power Station, Unit 1), Docket No. 50-322 O.L.

Dear Administrative Judges:

On behalf of Stone & Webster Engineering Corporation (S&W), and pursuant to paragraph 3 of the Board's Interim Confidentiality Order of April 7, 1982 in the above-referenced proceedings, we hereby identify those Stone & Webster Quality Assurance documents which Suffolk County wishes to use in the proceedings and which Stone & Webster wishes to have withheld from public disclosure on the ground that they contain confidential commercial information.

We have been advised by Counsel for Suffolk County (see letter dated May 19, 1982 - attached) that it wishes to use the following documents:*/

a. Document 1, Sections 1, 2, 7, 10, 15, 18, and Appendices I, II, III, and V.

^{*/} Document numbers correspond to those set forth in Attachment A of the Board's Order dated April 7, 1982.

MORGAN, LEWIS & BOCKIUS

- b. Document 2, QS 15.1, 14.2, 16.2
- c. Document 3, QAD 14.1, 15.2
- d. Document 4, QC 6.1, 6.3, 6.4, 15.1
- e. Document 5, EAP 2.10, 3.1, 3.6, 6.3, 15.1, 16.3, 5.11
- f. Document 8 (SWEC ASME III QA Manual), §15.

S&W will not seek to withhold the documents listed in paragraphs a. and d. above from public disclosure. S&W does desire to withhold the documents listed in paragraphs b, c, e, and f. from public disclosure on the grounds that they contain confidential commercial information.

The undersigned has conferred with Counsel for Suffolk County and Lilco, and, pursuant to the Board's direction, the following steps are suggested for resolution of the matter of confidentiality:

- May 27 -- Stone & Webster files papers seeking confidentiality for the documents in question.
- June 1 -- Suffolk County and LilCo file responses, if any. It should be noted in this regard, that Suffolk County is willing to consider an appropriate form of Protective Order and Agreement, and is also desirous of obtaining a prompt resolution of this matter.

I would appreciate it if the Board and all parties would address all future writings concerning the S&W documents to me and to Robert Orem, Esq., Assistant General Counsel, Stone & Webster Engineering Corporation, P. O. Box 2325, Boston, Massachusetts 02107.

George L Edgar (JAS)

George L. Edgar Attorney for

Stone & Webster

Engineering Corporation

cc: Robert Orem, Esq.

GLE: lpg

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS A PARTHERSHIP INCLUDING A PROPERTIONAL CORPORATION 1900 M STREET, N. W. WASHINGTON, D. C. 20036 IN PITTEBURGH RIPE PATRICE LOCKEART, JOHNSON & HUTCHISON TELEPHONE (BOE) 459-YOOO 1800 OLIVER BUILDING CABLE HIPRI PITTEBURGH, PENNSYLVANIA 18222 May 19, 1982 TELHA 440909 RIPH UI (412) 355-6500 WRITER'S DIRECT DIAL NUMBER 452-7064 George L. Edgar, Esq. Morgan, Lewis & Bockius 1800 M Street, N.W. Washington, D.C. 20036 In the matter of Long Island Lighting Company (Shoreham Nuclear Power Station,

Dear George:

This is to confirm the substance of our telephone conversation this morning in which I indicated to you that Suffolk County intends to use the following documents, produced by Stone & Webster Engineering Corporation (S&W), in connection with its testimony on quality assurance:

Unit 1), Docket No. 50-322 (O.L.)

- S&W QA Program for Shoreham -- Sections 1 (including Figure 1), 2, 7, 10, 15, and 18; Appendices I, II, III, and V.
- 2) S&W QA Standards -- QS 14.2, 15.1, and 16.2.
- 3) SWEC QA Directives -- QAD 14.1 and 15.2.
 - 4) S&W Field Quality Control Manual -- QC 6.1, 6.3, 6.4, and 15.1.
- 5) S&W Engineering Assurance Manual -- EAP 2.10, 3.1, 3.6, 5.11, 6.3, 15.1, and 16.3.
- 6) ASME Manual -- Section 15.

George L. Edgar, Esq. May 19, 1982 Page Two

In reviewing these documents, it has come to our attention that certain pages are missing from the copies we received from S&W. I would appreciate your arranging to have copies of the following missing pages sent to me as soon as possible:

S&W Field Quality Control Manual --QC 6.3 -- missing pages 2 and 4 QC 15.1 -- missing page 2

S&W Engineering Assurance Manual --EAP 15.1 -- portions of the entire procedure are illegible

ASME Manual --Section 15 -- missing pages 3 and 5

I look forward to hearing from you soon concerning S&W's position with respect to these documents.

Sincerely,

Karla J. Letsche

cc: Robert Orem, Esq.
W. Taylor Reveley, III, Esq.

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. 50-332 O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing letter have been served to the following on May 24, 1982, by U. S. mail, firs ass, except as otherwise indicated.

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 Court Road Mineola, New York 11501

Mr. Brian McCaffrey Long Island Lighting Company 175 East Old Country Road Hicksville, New York 11801 Howard L. Blau, Esq. 217 Newbridge Road Hicksville, New York 11801

W. Taylor Reveley, III, Esq. Hunton & Williams 707 East Main Street P. O. Box 1535 Richmond, Virginia 23212

Matthew J. Kelly, Esq. Staff Counsel New York State Public Service Commission 3 Rockefeller Plaza Albany, New York 12223

Stephen B. Latham, Esq. Twomey, Latham & Shea 33 West Second Street P. O. Box 398 Riverhead, New York 11901

Marc W. Goldsmith Energy Research Group, Inc. 400-I Totten Pond Road Waltham, Massachusetts 02154 Ralph Shapiro, Esq. Cammer and Shapiro 9 East 40th Street New York, New York 10016

David H. Gilmartin, Esq. Suffolk County Attorney County Executive/Legislative Building Veterans Memorial Highway Hauppauge, New York 11788

Hon. Peter Cohalan Suffolk County Executive County Executive/Legislative Bldg. Veterans Memorial Highway Hauppauge, New York 11788

Jay Dunkleberger, Esq. New York State Energy Office Agency Building 2 Empire State Plaza Albany, New York 12223

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

Lawrence Coe Lanpher, Esq.*/
Kirkpatrick, Lockhart,
Hill, Christopher & Phillips
1900 M Street, N.W., 8th Floor
Washington, D. C. 20036

DATED: May 24, 1982

*/ Hand delivered

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

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

Bernard M. Bordenick, Esq. David A. Repka, Esq. 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

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

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

George L. Edgar, Esq. Morgan, Lewis & Bockius

1800 M Street, N.W., Suite 700

North Entrance

Washington, D. C. 20036