

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 (OL)
(Shoreham Nuclear Power Station,)
Unit 1))

MOTION OF LONG ISLAND LIGHTING COMPANY
TO ADD WILLIAM J. ROTHS AS WITNESS ON
SC/SOC CONTENTION 7B AND SOC CONTENTION 19(b)

The Long Island Lighting Company respectfully requests permission to add William J. Roths as a supplemental witness on SC/SOC Contention 7B and SOC Contention 19(b). A copy of his professional qualifications is attached.

Mr. Roths is currently Program Manager, Emergency Response Information Systems for the General Electric Company. Prior to assuming this position, he spent a number of years as Program Manager for programs carried out in response to General Electric's Nuclear Reactor Study (Reed Report). Although LILCO did not rely explicitly or implicitly on the Reed Report in its direct testimony on these contentions, Suffolk County requested that General Electric produce the report for use in cross-examination. General Electric has treated this report as proprietary information but agreed to allow access to it under specified conditions (see attached "Agreement regarding Disclosure of Confidential Commercial

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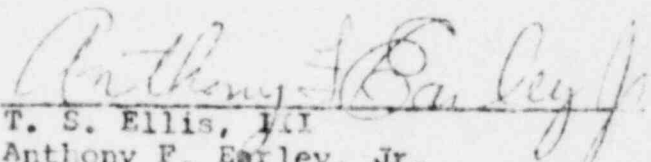
Information"). In return for being given access to the Reed Report, Suffolk County agreed to inform General Electric if it intended to use the report on cross-examination.

Furthermore, if the County did decide to use the report, it would not object to supplementing LILCO's panel on these contentions with a witness familiar with the Reed Report.

The County has informed General Electric that it intends to use the Reed Report on cross-examination. Accordingly, LILCO requests that Mr. Roths be added to the witness panel for SC/SOC Contention 7B and SOC Contention 19(b).

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY


T. S. Ellis, III
Anthony F. Earley, Jr.

Hunton & Williams
P. O. Box 1535
Richmond, Virginia 23212

DATED: June 17, 1982

Professional Qualifications

WILLIAM J. ROTHS

Program Manager - ERIS
General Electric Company

Mr. Roths is an Engineering Manager, employed by the Nuclear Power Systems Division of the General Electric Company in San Jose, California. He is currently Program Manager, Emergency Response Information System.

From 1975 through 1980, Mr. Roths' duties included the responsibility of serving as Program Manager for programs being carried out in response to the findings and recommendations contained in General Electric's Reed Report. This responsibility consisted of assuring that programs responsive to the Report were defined, presenting these programs to higher management for approval, monitoring progress of the programs, and organizing periodic review meetings conducted by the Reed Review Team. During this time he was also Manager, Reliability Engineering Operation where his responsibilities included reliability analyses, design reviews and engineering quality assurance.

Mr. Roths has been employed by General Electric since 1951. From 1951 to 1956 he participated in Advanced Engineering training programs conducted by GE as student and then as instructor. From 1956 to 1970 he worked as

System Engineer and Manager of System Engineering in the Company's Aerospace business. From 1970 to 1972 he served as Project Manager for a project in the GE Computer business. From 1972 until 1975 he worked in the Nuclear Energy business with assignments in Planning and Engineering Consulting.

Mr. Roths received a B.S. in Electrical Engineering from Kansas State University in 1951.

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In the Matter of)
)
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LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,)
Unit 1))
_____)

Docket No. 50-322-OL

AGREEMENT REGARDING DISCLOSURE OF
CONFIDENTIAL COMMERCIAL INFORMATION

A. _____ (hereinafter "Signator")
is Counsel [Consultant] to _____, a party to the
above-captioned proceeding.

B. The Long Island Lighting Company (LILCO) has engaged General
Electric Company (GE), a non-party in this proceeding, to supply the
nuclear steam supply system for the Shoreham Nuclear Power Station,
Unit 1.

C. _____ has requested that its
counsel [consultant] be permitted to inspect the following GE documents:

The Reed Report and the related Sub-Task
Force Reports.

These documents are claimed by GE to contain confidential information
and to be customarily held in confidence.

D. GE will make the documents available to Signator at
facilities designated by Long Island Lighting Company for inspection

and the sole purpose of making verbatim extractions of those documents which are relevant to SC/SOC contention 7B and SOC contention 19(b) (hereinafter "information") provided that the information will be treated in a confidential manner as provided below.

E. In consideration of the disclosure of the information by GE, the Signator agrees as follows:

(1) Signator will inspect the documents, and take any notes in strict confidence and secrecy.

(2) Signator will use the information only for cross-examination purposes in connection with the existing contentions SC/SOC 7B and SOC 19(b) in the above-captioned proceeding. The information, if used in whole or in part for any of the above purposes, shall be subject to paragraphs (3), (4) and (5) below and shall be presented only during in camera sessions before the Board that provide protection against non-disclosure equivalent to that provided under this Agreement.

(3) Signator will not photocopy, transcribe, reproduce, or disclose the documents nor use the documents for any purpose other than that provided in paragraph D above.

(4) Signator will not photocopy, transcribe, reproduce or disclose the information to any other person or entity who has not executed this Agreement.

(5) Signator will safeguard and hold in strict confidence the information and documents.

(6) Restrictions on disclosure contained herein shall not apply to any information or material:

- a. which can be shown to have been known or used by Signator prior to the date of disclosure to Signator by GE, or
- b. which either before or after the date of disclosure to Signator by GE is lawfully disclosed to Signator by an independent third party without restriction on disclosure on behalf of GE, or
- c. which either before or after the date of the disclosure to Signator by GE becomes available to the public through no fault of Signator.

Nothing in this Agreement shall be construed as permitting Signator to unfairly obtain the right to use information that becomes publicly known through an improper act or omission on their part.

(7) Signator may not assign this Agreement.

(8) Signator makes no admission as to whether the information or documents disclosed by GE are, in fact, confidential commercial information, but Signator will treat the information and documents on a confidential basis. In the event any NRC regulation, rule, or ASLB order, other administrative order, or judicial ruling requires the disclosure of the information without providing the equivalent protection accorded under this Agreement, GE will have the right to immediately withdraw

the information from Signator upon request, and Signator will promptly abide by that request.

(9) Signator will return to GE all of the information at the conclusion of his use, but in no event later than the termination of his employment by Intervenor, or the conclusion of the above-captioned proceeding, whichever occurs first.

Date

Signator

CONSENTED TO

GENERAL ELECTRIC COMPANY

BY _____

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 the Motion of Long Island Lighting Company to Add William J. Roths as Witness on SC/SOC Contention 7B and SOC Contention 19(b) were served upon the following by first-class mail, postage prepaid, on June 18, 1982, or by hand on June 7, 1982 (as indicated by an asterisk), on:

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

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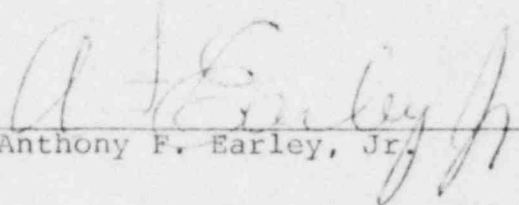
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DATED: June 17, 1982