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SUFFOLK COUNTY
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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) Docket No. 50-322 (OL)
)
(Shoreham Nuclear Power Station,)
Unit 1))

LILCO'S SECOND REQUEST TO SUFFOLK COUNTY FOR
PRODUCTION OF EMERGENCY PLANNING DOCUMENTS

The Long Island Lighting Company (LILCO) hereby requests Suffolk County to produce at LILCO's offices in Hicksville or at another mutually agreed-upon location each of the documents set forth below, within thirty (30) days after service of this request, in accordance with 10 C.F.R. § 2.741. These document requests pertain to the emergency planning and preparedness issues under consideration by the Atomic Safety and Licensing Board in the Shoreham operating license proceeding.

DEFINITIONS

A. "County" means the government organization of Suffolk County and any officer, official, employee, representative,

consultant, agent, contractor, subcontractor, technical advisor, attorney, or other person acting for or on behalf of the County or at the County's direction, or in concert with the County or assisting the County.

B. "Person" means any natural person, firm, partnership, educational institution, joint venture, corporation, and any domestic government organization, or group of natural persons or such entities.

C. "Document" means any handwritten, typewritten, printed or recorded graphic matter however produced or reproduced, whether or not in the possession, custody or control of the County and whether or not claimed to be privileged against discovery on any ground, including but not limited to reports, records, lists, memoranda, correspondence, telegrams, schedules, photographs, sound recordings, ledgers, books of account, catalogues, checks, check stubs, brochures and written statements of any person.

If the County considers any document called for in this request to be privileged from production, the County must include in its response to this request a list of documents withheld from production, identifying each document by date, addressee(s), author, title and subject matter. In addition,

the County should identify those persons who have seen the document or who were sent copies, and state the ground(s) upon which each such document is considered privileged.

If any document called for in this request has been destroyed, the County must include in its response to this request a description of the documents destroyed, identifying each document by date, addressee(s), author, title, and subject matter. In addition, the County should state the date of destruction, the identity of the person or persons who destroyed the document, and the reason the document was destroyed.

D. The words "pertaining to" include referring to, responding to, relating to, connected with, concerning, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

DOCUMENT REQUESTS

1. All testimony on emergency planning given by any of Suffolk County's consultants, officials, employees, or representatives in any proceeding, be it administrative, legislative, or judicial. Such consultants include, but are not limited to, the following:

| | |
|----------------------|------------------|
| Stan Fabic | W. Kulash |
| Howard Lambert | P. Polk |
| Social Data Analysts | B. Ogden |
| Future Resources | W. Harold |
| Associates, Inc. | S. Seeburger |
| W. Hansen | E. Plank |
| D. Schoppert | Frank Jones |
| A. Kanen | Dr. Stephen Cole |
| R. Tanczos | Peter Davis |
| R. Aschettino | S. T. Wray, Jr. |
| R. Sumner | A. H. Bogen |
| H. E. Lambert | |

2. All documents, articles, papers, or other publications pertaining to emergency planning, authored or co-authored by any of Suffolk County's consultants, officials, employees, or representatives, including but not limited to these consultants:

| | |
|-----------------------|----------------------------|
| PRC-Voorhees | Dr. Walter C. Farrell, Jr. |
| Prof. Philip B. Herr | Dr. David Stevenson |
| Dr. Kai T. Erikson | Dr. Fred Finlayson |
| Dr. James H. Johnson | Dr. Robert J. Budnitz |
| Dr. Donald J. Ziegler | Dr. Edward P. Radford |
| Stan Fabic | W. Kulash |
| Howard Lambert | P. Polk |
| Social Data Analysts | B. Ogden |
| Future Resources | W. Harold |
| Associates, Inc. | S. Seeburger |
| W. Hansen | E. Plank |
| D. Schoppert | Frank Jones |
| A. Kanen | Dr. Stephen Cole |
| R. Tanczos | Peter Davis |
| R. Aschettino | S. T. Wray, Jr. |
| R. Sumner | A. H. Bogen |
| H. E. Lambert | |

3. All documents pertaining to Social Data Analysts' telephone surveys of Nassau and Suffolk County

residents regarding emergency planning, including but not limited to draft and final survey questions, draft and final results of the surveys, and documents describing the methods used to conduct the surveys.

4. All documents relied upon by Social Data Analysts in preparing the survey questions used in any surveys regarding emergency planning.
5. The text of any public statements bearing on emergency planning made by any Suffolk County official during and up to two months prior to the telephone surveys by Social Data Analysts.
6. All correspondence between the County and Social Data Analysts regarding the emergency planning surveys.
7. All documents studying, analyzing, or otherwise pertaining to the results of the Social Data Analysts emergency planning surveys.
8. All documents studying, analyzing, or otherwise pertaining to the local conditions that might influence the Shoreham onsite emergency plan.
9. All documents analyzing, studying, or otherwise pertaining to procedures that might be used to notify those within the EPZ who are deaf or hard of hearing.

10. All documents analyzing, studying or otherwise pertaining to the traffic or radiological conditions that might exist during a radiological emergency.
11. All documents analyzing, studying, or otherwise pertaining to the various protective actions available for the plume exposure pathway EPZ during emergency conditions, and the bases for choosing one of those actions.
12. All evacuation time estimate studies for Long Island prepared by the County, its employees, or its consultants.
13. All documents analyzing, studying, or otherwise pertaining to evacuation time estimate studies for Long Island.
14. All analyses, studies, or surveys regarding the voluntary evacuation or other actions by people outside the EPZ.
15. All documents analyzing, studying or otherwise pertaining to analyses, studies, or surveys regarding the voluntary evacuation or other actions by people outside the EPZ.

16. All documents identifying, analyzing, studying, or otherwise pertaining to protective actions for persons for whom the full range of protective actions may not be available.
17. All documents addressing, analyzing, studying, surveying, or otherwise pertaining to the possibility that LILCO and non-LILCO personnel expected to report to the site for emergency duty would fail to report (or to report in a timely manner) because of conflicting family or other duties that would arise in the event of a radiological emergency.
18. All documents analyzing, studying, or otherwise pertaining to public education programs to inform the population potentially affected by a radiological emergency of the initial and subsequent actions to be taken in the event of a radiological emergency.
19. All documents regarding the particular social and psychological profile of Suffolk County's residents and the probable response of particular groups, such as the economically disadvantaged, to various educational programs.

20. All documents analyzing, studying, or otherwise concerning a PRA consequence analysis applicable to Shoreham.
21. All documents detailing, analyzing, studying, or otherwise pertaining to the methods for prompt notification of any boats within the EPZ.
22. All documents pertaining to or analyzing the relative merits of various means of providing public information to ensure preparedness to respond to a radiological emergency.
23. All documents analyzing, studying, or otherwise pertaining to the most effective method to inform the transient or permanent population or both within Suffolk County of the protective actions to be taken in the event of a radiological emergency at Shoreham.
24. All documents studying, analyzing, or otherwise concerning possible obstacles, such as impassible roadways due to evacuation or adverse environmental conditions, that might prevent field monitoring teams from reaching the offsite monitors.

25. All documents pertaining to consequence analysis studies that reflect the potential consequences of a serious radiological emergency at Shoreham.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

Kathy E. B. McCleskey
W/ Taylor Reveley, III
James N. Christman
Kathy E. B. McCleskey

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DATED: June 22, 1982

LILCO, June 22, 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 SECOND REQUEST TO SUFFOLK COUNTY FOR PRODUCTION OF EMERGENCY PLANNING DOCUMENTS were served upon the following by first-class mail, postage prepaid, by Federal Express (as indicated by an asterisk), or by hand (indicated by two asterisks), on June 22, 1982:

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U.S. Nuclear Regulatory
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U.S. Nuclear Regulatory
Commission
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