

attend due to prior professional commitments. However, during a conference call that afternoon, counsel for LILCO alleged that NSC contentions were in a form which did not permit ready identification of the particulars of its contentions and were argumentative.

Rather than spend the time of the Board and of the parties in a proceeding to determine the merits or lack thereof of LILCO's objections to the draft contentions and to meet the Board's filing schedule, NSC's counsel undertook to revise it's draft, without sacrificing substance, to meet his understanding of LILCO's objections and to serve the revised contentions on counsel for LILCO, the Staff and the other intervenors no later than Friday, July 2, 1982. The result of this commitment follows.

Time and constraints (and the intervening holiday weekend), will apparently not permit the filing in the form of consolidated contentions by July 6, 1982, the date established by the Board. However, we believe that there is neither duplication, overlap, nor redundancy between NSC's contentions and SOC's contentions and SC's contentions, and thus the spirit and purpose underlying the Board's order for a consolidated filing has been met.

FAILURE OF SHOREHAM/LILCO'S EMERGENCY PLANS
TO COMPLY WITH NRC/FEMA REGULATIONS

NSC 1(EP): Notification procedures established by LILCO to communicate with State and local response organizations do not meet the requirements of 10 CFR 50.47(b) (1), (2), (3), (4), (5), and (6); 10 CFR Part 50 Appendix E.II.C, G, H and IV.E.9.

Bases:

(1) Both the dedicated and commercial telephone lines and the low-powered UHF radio station upon which Shoreham's notification/

communications network rely are inadequate.

(2) Given the significant probability that the telephone system will break down, suffer a power overload or be sabotaged by hostile forces, and the absence of a backup power source, there is a strong likelihood of inadequate and untimely notification to State and local response organizations.

(3) LILCO's plan does not take into account the history of power outages in Long Island which have rendered telephone systems inoperable for extensive periods of time.

(4) The placement of telephone lines overhead exposes the telephone communications system to sabotage and extreme weather conditions.

(5) The breakdown of the telephone system in the event of an emergency shutdown at the plant or an overall system overload would prevent LILCO from assigning and specifying primary responsibilities for emergency response between the applicant and State and local response organizations.

(6) Measures to communicate with key plant personnel who may not be in the plant or at home when an emergency occurs have not been adequately addressed.

(7) Insufficient personnel are connected to the "hotline" to satisfy the requirements of the regulations.

(8) LILCO's plan does not address the stress and strain to which the personnel assigned to response and notification may be subjected when confronted with a previously unexperienced radiological emergency.

(9) LILCO has assigned too few Emergency Operations Facility personnel to transmit the key information to offsite emergency support and response organizations from an onsite location.

(10) The communication/notification system is inadequate to arrange for, request, and effectively use assistance resources.

(11) The communication/notification system does not assure State and local response organizations that LILCO will be able to provide them with the information which they require to determine minimum initial offsite response measures.

(12) The Electrical Emergency Restoration Procedure does not meet the criteria for an adequate backup power source.

(13) The plan presents insufficient data about the coverage and load capacities of the low-powered UHF base radio station to assess its capabilities if a breakdown in the primary telephone systems should occur.

NSC 2(EP): Communications between LILCO and State and local response organizations do not meet the federal standards in 10 CFR 50.47 (b) (1), (3), (5), (6), (7) and (8); 10 CFR Part 50, Appendix E.II.G and Appendix E.IV.D.1, D.3, and Appendix E.IV.E.9.

Bases:

The interaction between the notification contentions, (NSC 1 (EP)), and this contention is obvious. The following particularizations of this contention are added and do not overlap contention NSC 1(EP).

(1) Communications with the outside governmental agencies, the Media and the public are inadequately staffed, briefed and technically equipped to ensure a coordinated dissemination of vital information to these offsite sources of support and response implementation.

(2) The plan presents insufficient data to determine if the

two-way UHF radio between the control room of the plant and the ENS will not malfunction, suffer an overload or interference.

(3) The plan presents insufficient data to determine if LILCO's "uninterruptible power source" to back up their party line system (Rev. B, Shoreham Annex, §5.7.7), is both adequate and capable of being implemented.

(4) Assignment of the Health Physics Engineer to sole responsibility for ensuring the availability of the communication equipment during emergency conditions is both imprudent and unrealistic.

(5) The plan gives an inordinate amount of responsibility to the Emergency Director, but has not included the Emergency Director's private home in the network of those accessible to the Private Automatic Exchange.

(6) The plan does not consider that the Emergency Director may not be able to perform the non-delegable tasks assigned to him/her.

(7) The plan gives inadequate consideration to the possibility that the Emergency Director or the Response Manager may make communication decisions or allocate the limited communications resources in a manner in conflict with the county or State's decisions in these areas.

NSC 3(EP): Arrangements for assistance resources needed onsite, particularly medical and emergency transportation assistance, do not meet 10 CFR 50.47 (b) (3), (5), (6), (8), (10), (11) and (12), as mandated by the NRC.

Bases:

(1) There is no assurance that medical personnel will be notified, or if notified, will be available, in sufficient time to

provide medical assistance.

(2) The plan does not assure adequate transportation and medical assistance to transport contaminated and/or injured persons from an irradiated area for medical treatment.

(3) There is no contingency plan to deal with unpreparedness, overcrowding, refusal to contaminate other patients and workers by the emergency facilities.

(4) LILCO's plans do not adequately correlate medical assistance with the different types of emergency classifications.

(5) The plan does not provide reasonably specific indicia of the contents of the applicant's messages to the emergency assistance workers and agencies in their relationship to the different classifications of an emergency.

(6) The provisions for backup medical assistance with the requisite training, facilities and preparation to respond to an emergency are inadequate.

(7) The letters of agreement with the medical and other facilities are not current and, additionally, do not specify the functions each will perform.

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Respectfully submitted,

Cammer & Shapiro, P.C.

By: Ralph Shapiro
Ralph Shapiro, Esq.

9 East 40th Street
New York, N.Y. 10016
(212) 683-6790

Attorney for North Shore
Committee Against Nuclear
and Thermal Pollution.