

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Lawrence Brenner, Chairman
Dr. James H. Carpenter
Dr. Peter A. Morris

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

As permitted by the Commission's order dated July 30, 1982 (CLI-82-17) Pacific Gas and Electric Company (PGandE) makes this special appearance to oppose the request of counsel for intervenor Suffolk County for access by its consultants to portions of the Appeal Board decision on the Diablo Canyon Security Plan (ALAB-653). Further, for the reasons set forth below PGandE will oppose any similar requests made in the future.

PGandE submits that there is no need for the Suffolk County consultants to have this information. Their mission is to analyze the Shoreham security plan, not Diablo Canyon's. Furthermore, in another order dated July 30, 1982 (CLI-82-19) the Commission released a sanitized version of ALAB-653. This should give the Suffolk County consultants sufficient information for their purposes.

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PGandE has expressed many times its continuing reluctance to permit outsiders to review its security plan because of the risk of unauthorized release of the details of the plan. PGandE was agreeable to having certain lawyers look at selected portions of the Diablo Canyon ALAB decision to offset what it perceived to be the advantage Suffolk County counsel otherwise would have had due to their participation in the Diablo Canyon proceeding. Now, it is requested that security plan information be given to consultants for that intervenor, and a similar request for other consultants can be expected. PGandE submits that release of protected information to an ever expanding group of persons violates the spirit at least, if not the letter, of the principle of limiting access to security plan details strictly followed by the Appeal Board in the Diablo Canyon proceeding. (See Appeal Board order dated October 17, 1980 reluctantly permitting an additional lawyer for Governor Brown to have access to the security plan. See also ALAB-410, (5 NRC 1398) and CLI 77-23, (6 NRC 455.)

Respectfully submitted,

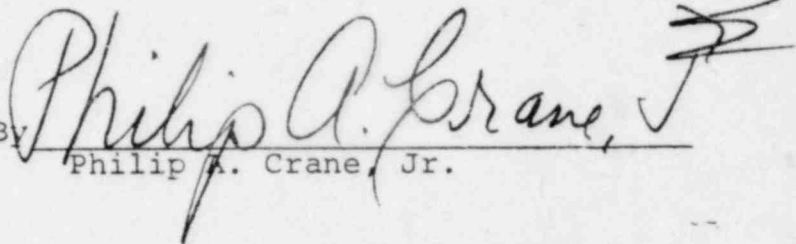
Dated: August 11, 1982

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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

The foregoing document of Pacific Gas and Electric Company has been served today on the following by deposit in the United States mail, properly stamped and addressed:

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