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August 13, 1982

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OFFICE OF SECRETARY
NUCLEAR REGULATORY COMMISSION

IN PITTSBURGH
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Lawrence Brenner, Esq.
Dr. James L. Carpenter
Dr. Peter A. Morris
Administrative Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Long Island Lighting Company;
Shoreham Nuclear Power Station,
Unit 1; Docket No. 50-322 O.L.

Gentlemen:

Filed herewith on behalf of Suffolk County in the captioned matter are an Application of Issuance of Subpoena and a Subpoena Duces Tecum with respect to documents referenced and relied upon by Long Island Lighting Company ("LILCO") in its letter SNRC-716, dated June 21, 1982, or referenced and relied upon by witnesses sponsored by LILCO in direct testimony, dated June 29, 1982, filed in this case. The documents referenced in the letter were requested to be furnished voluntarily by LILCO on July 26, 1982, but LILCO's counsel has not yet indicated which documents it is prepared to supply voluntarily. In view of this long delay, Suffolk County has no choice but to request issuance of the enclosed subpoena.

This matter has been discussed with counsel for LILCO and copies of correspondence by telecopy to LILCO counsel and the undersigned are attached hereto. As indicated in my letter to Mr. Christman, we are prepared to settle informally the issue of the production of documents related to Suffolk County's Quality Assurance/Quality Control contentions; however, it would appear that in view of the 2-1/2 weeks that have passed since an informal request was made for certain documents, the issuance of

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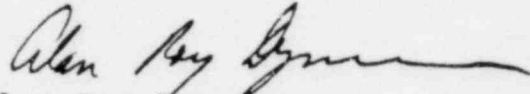
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a subpoena is appropriate in order to provide for the expeditious production of documents to permit Suffolk County adequately to cross-examine the LILCO witnesses.

We request that the Board arrange a conference call with counsel at its earliest convenience, early next week, with regard to the Application for Issuance of the Subpoena.

Very truly yours,



Alan Roy Dwyer

ARD/dk
Enclosures

cc: Service List