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February 10, 1983

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

Re: Shoreham Nuclear Power Station - Docket No. 50-322

Dear Administrative Judges:

Suffolk County has reviewed Appendix A to LILCO's Proposed Findings, which constitutes the proposed "Background of the Proceeding" section. The County generally does not object to this proposed Background section, except as follows:

1. Page A-4, ACRS Review. The quoted material from the ACRS letter references recommendations which are set forth in the ACRS letter but which are not included in the proposed Background section. The County would include those ACRS recommendations in the Background section prior to the quoted material.

2. Page A-7, End of Security Discussion. The County would add the following sentence prior to "(b)":

The Security Settlement contains safeguards information and thus the terms and details of that resolution cannot be further described.

3. Pages A-9 and A-10, Prehearing Process. Beginning on Page A-9, five lines from the bottom ("The more significant . . .) through Page A-10, except last two lines, LILCO describes what it believes are the more "significant" informal exchanges among the parties. The County believes this should all be deleted. First, the Board should not be describing which exchanges were significant. It is sufficient merely to note (lines 16-17 on Page A-19) that many informal exchanges occurred. Second, the

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County does not agree with the list of "significant" exchanges set forth on Page A-10 and does not believe any such list can accurately be set forth (assuming the Board thought such a listing was appropriate).

4. Page A-11 and Footnote 2, Discovery. The County believes footnote 2 is unnecessary and inappropriate.

5. Page A-13, last paragraph, Summary Disposition. While there was no formal summary disposition phase after the March 1982 Prehearing Conference, the opportunity for summary disposition was still present. This paragraph should be revised to reflect this fact. Also, there was more than one summary disposition motion (see recent EQ motion).

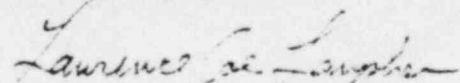
6. Pages A-14 through A-17, Middle -- Settlements. The County does not dispute the correctness of this section but believes it could be considerably shortened, particularly given Appendix B.

7. Page A-18, Prehearing Examinations. The County disagrees that the depositions used for Torrey Pines were similar to those ordered by the Board for Phase I emergency planning. Accordingly, the County believes that lines 12-17 on Page A-18 should be deleted.

8. Page A-22, Hearings. One in camera session was held in June 1982 concerning the Reed Report.

9. Page A-34, Conclusion. The County suggests that this section be deleted as no conclusion is required for a Background section. Further, the County is not sure that all the statements in this section are fully supportable.

Sincerely yours,



Lawrence Coe Lanpher

LCL/ss
CC: Service List