

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,)	(Emergency Planning -
Unit 1))	Phase I)

AFFIDAVIT OF EDWARD P. RADFORD, M.D.

State of New York)	to wit:
County of Suffolk)	

My name is Edward P. Radford. I am a Professor of Environmental Epidemiology and Director of the Center for Environmental Epidemiology at the University of Pittsburgh.

As an M.D. and an expert on the human health effects of ionizing radiation, I am presently serving Suffolk County, New York, as a consultant in its ongoing emergency planning efforts connected with the Shoreham Nuclear Power Station.

It is my understanding that Mr. Andrew Kanen of PRC Voorhees of McLean, Virginia has testified that ambulance travel from the Shoreham site to Central Suffolk Hospital may be delayed by as much as one hour above the normal travel time for that trip. It is my opinion that such a delay, in some cases, could have an adverse impact, upon a contaminated injured individual being transported from the Shoreham site to Central Suffolk Hospital. The impact could be most extreme on those requiring immediate treatment for traumatic injuries which can be life-threatening

if not dealt with promptly. In addition delay of decontamination of radioactive contamination could greatly increase the radiation exposure of such injured person, with the possibilities of immediate or delayed effects of radiation thereby greatly increased.

Nov 17, 1982
Date

Edward P Redford
Name

Subscribed and sworn to before me on the 17th day of November 1982

Dorothy Manning
Notary Public

DOROTHY MANNING
NOTARY PUBLIC, State of New York
Suffolk County-No. 52-4519712
Commission Expires March 30, 19 84

1 MR. SEDKY: SURE.

2 (BRIEF RECESS.)

3 BY MR. SEDKY:

4 Q MR. DI MASCIO, WE WERE TALKING ABOUT YOUR COMMUNICATIONS
5 WITH MR. SEARS AFTER THE SUBMISSION OF REV 2. DO YOU RECALL
6 THAT?

7 A YES.

8 Q THAT IS WHAT WE WERE TALKING ABOUT. THERE WAS MORE
9 THAN ONE BUT FEWER THAN TEN, I GATHER, OF THOSE COMMUNICATIONS;
10 IS THAT RIGHT?

11 A THAT'S CORRECT.

12 Q WHAT SUBJECTS WERE DISCUSSED IN THOSE CONVERSATIONS
13 WITH MR. SEARS?

14 A WE DISCUSSED THE SER OPEN ITEMS.

15 Q ALL 60 OF THEM?

16 A NOT ALL 60 OF THEM, NO.

17 Q WHICH ONES DID YOU DISCUSS?

18 A WE HAVE DISCUSSED SEVERAL. I DON'T REMEMBER ALL
19 THE ONES THAT WE HAVE DISCUSSED.

20 Q TELL ME ABOUT THE ONES YOU DO REMEMBER.

21 A WE HAVE DISCUSSED TABLE B-1.

22 Q WHAT ELSE?

1 A WE HAVE ALSO DISCUSSED SOME OF THE INITIATING CONDITIONS.

2 Q ALL RIGHT. WHAT ELSE?

3 A WE DISCUSSED THE SER OPEN ITEM ON -- I DON'T KNOW EXACTLY
4 HOW IT IS WORDED, BUT IT DEALS WITH COMMUNICATION LINKS BETWEEN
5 AMBULANCE AND UTILITY.

6 Q ANYTHING ELSE?

7 A WE DISCUSSED MORE, BUT THAT IS ALL I CAN REMEMBER
8 RIGHT NOW.

9 Q HAVE YOU EXHAUSTED YOUR PRESENT RECOLLECTION AS
10 TO THE SUBJECTS YOU DISCUSSED WITH MR. SEARS?

11 A GIVEN MORE TIME, I COULD PROBABLY THINK OF MORE.

12 Q MAYBE WE WILL COME BACK TO THAT LATER THIS AFTERNOON
13 AND SEE IF OUR ONGOING EXAMINATION REFRESHES YOUR RECOLLECTION.

14 ON TABLE B-1, WHAT WAS THE TOPIC UNDER DISCUSSION THERE?
15 MR. DI MASCIO, BEFORE YOU RESPOND TO THAT, I JUST WANT TO
16 ESTABLISH A COUPLE OF THINGS. WERE THESE DISCUSSIONS BETWEEN
17 JUST YOU AND MR. SEARS OR WERE THERE OTHER PEOPLE INVOLVED
18 IN THESE CONVERSATIONS?

19 A IT WAS A TELEPHONE CALL BETWEEN MR. SEARS AND MYSELF.

20 Q WAS IT ONE TELEPHONE CALL YOU ARE RECALLING RIGHT
21 NOW?

22 A SPECIFICALLY ON TABLE B-1 AS YOU ASKED ME?

1 Q NO. BEFORE WE GET TO THAT IN TERMS OF B-1, I WANT
2 TO GET WHETHER IN YOUR EARLIER RESPONSE WHEN YOU SAID "WE"
3 DISCUSSED, "WE" DISCUSSED, "WE" DISCUSSED AND YOU IDENTIFIED
4 THREE AREAS, THE "WE" YOU ARE REFERRING TO, WAS THAT YOU AND
5 MR. SEARS ONLY OR YOU AND MR. SEARS AND SOMEBODY ELSE ON THE
6 NRC STAFF?

7 A MR. SEARS AND MYSELF.

8 Q ALONE, CORRECT, ON THE TELEPHONE?

9 A YES.

10 Q ANYBODY ON YOUR END, OTHER THAN YOU, ON A SPEAKERPHONE
11 OR EXTENSION LINE?

12 A NO.

13 Q TO YOUR KNOWLEDGE, WAS ANYBODY ELSE ON HIS END?

14 A NOT TO MY KNOWLEDGE.

15 Q DID YOU TAKE NOTES OF THESE CONVERSATIONS?

16 A SOME OF THEM I DID.

17 Q DO YOU STILL HAVE THOSE NOTES?

18 A I BELIEVE I DO.

19 Q ARE THEY IN THE PERSONAL FILE YOU REFERRED TO?

20 A THEY PROBABLY WOULD BE IN THERE.

21 Q LET'S GO BACK TO TABLE B-1. WHAT WAS THE SUBSTANCE
22 OF THE DISCUSSION CONCERNING THAT MATTER?

1 A THE DISCUSSION CENTERED AROUND MORE OF A GENERIC
2 PHILOSOPHY ABOUT 30-MINUTE STAFFING REQUIREMENTS.

3 MR. SEDKY: READ THE ANSWER BACK.

4 (CHE ANSWER WAS READ BY THE REPORTER.)

5 BY MR. SEDKY:

6 Q WHAT DO YOU MEAN BY THE PHRASE "GENERIC PHILOSOPHY"?

7 A THERE ARE DIFFERENT INTERPRETATIONS THAT CAN BE
8 DERIVED FROM TABLE B-1 REQUIREMENTS AND OUR DISCUSSION CENTERED
9 ON TRYING TO CLARIFY AND GET NRC'S POSITION ON TABLE B-1.

10 Q IN YOUR LAST ANSWER, ARE YOU INTENDING TO LIMIT
11 YOURSELF TO THE 30-MINUTE STAFFING REQUIREMENTS OR GENERALLY
12 B-1?

13 A WE MAY HAVE MENTIONED THE ENTIRE B-1 BUT IT CENTERED
14 SPECIFICALLY, I WOULD SAY, ON 30 MINUTES.

15 Q WHEN YOU ARE REFERRING TO TABLE B-1, MR. DI MASCIO,
16 YOU ARE TALKING ABOUT TABLE B-1 IN NUREG-0654; IS THAT CORRECT?

17 A THAT'S CORRECT.

18 Q THE TABLE IN THE PLAN IS TABLE 5-1; IS THAT CORRECT?

19 A I AM NOT SURE OF THE EXACT TABLE IN THE PLAN.

20 MR. SEDKY: LET ME HAVE MARKED FOR IDENTIFICATION AS
21 DI MASCIO EXHIBIT 2 A DOCUMENT ENTITLED "MINIMUM STAFFING
22 REQUIREMENTS FOR NRC LICENSEES FOR NUCLEAR POWER PLANT

1 EMERGENCIES," A TWO-PAGE DOCUMENT.

2 (THE DOCUMENT REFERRED TO WAS
3 MARKED DI MASCIO DEPOSITION EXHIBIT
4 NO. 2 FOR IDENTIFICATION AND IS
ATTACHED TO THE COURT COPY OF THIS
DEPOSITION.)

5 BY MR. SEDKY:

6 Q ARE YOU ABLE TO IDENTIFY DI MASCIO EXHIBIT 2 FOR
7 IDENTIFICATION?

8 A IT LOOKS LIKE THE TABLE FROM THE EMERGENCY PLAN,
9 YES.

10 Q THIS IS THE TABLE, IS IT NOT, THAT IS SUPPOSED TO
11 CONFORM TO TABLE B-1 IN NUREG-0654? IS THAT CORRECT?

12 A YES.

13 Q GETTING BACK TO YOUR CONVERSATION WITH MR. SEARS
14 ON TABLE B-1, LET ME ASK YOU PRELIMINARILY WHO INITIATED THAT
15 CONVERSATION. DID YOU CALL HIM OR DID HE CALL YOU?

16 A I BELIEVE THAT WAS WITH HIM.

17 Q WHAT DID HE SAY TO YOU IN THAT CONVERSATION?

18 A I DON'T REMEMBER THE PRECISE CONVERSATION.

19 Q WHAT INFORMATION DID HE CONVEY TO YOU IRRESPECTIVE
20 OF EXACTLY WHAT HE SAID?

21 A THE RESULT OF WHAT HE SAID WAS THAT OUR TABLE AS
22 PRESENTED DID NOT DIRECTLY MEET NUREG-0654 REQUIREMENTS.

Q DID HE INDICATE TO YOU IN WHAT MANNER IT DID NOT

1 MEET THE REQUIREMENTS?

2 A THE FACT THAT THE 30-MINUTE REQUIREMENTS WERE NOT
3 MET.

4 Q BY LOOKING AT DI MASCIO EXHIBIT NO. 2 FOR IDENTIFI-
5 CATION, ARE YOU ABLE TO IDENTIFY IN WHAT WAY THE 30-MINUTE
6 REQUIREMENTS WERE NOT MET?

7 A YES.

8 Q WOULD YOU TELL US ABOUT THAT.

9 MR. RUDLIN: WHAT IS THE QUESTION THAT YOU HAVE PENDING?
10 YOU ARE ASKING THE WITNESS TO COMPARE EXHIBIT 2 TO THE REQUIRE-
11 MENTS CONTAINED IN TABLE B-1 IN NUREG-0654?

12 MR. SEDKY: AS I UNDERSTOOD HIS TESTIMONY, AND PERHAPS
13 I MISUNDERSTOOD HIM, HE WAS ADVISED BY MR. SEARS THAT DI MASCIO
14 EXHIBIT 2 DID NOT COMPLY WITH NUREG-0654 AND I ASKED HIM IN
15 WHAT FASHION AND HE SAID IT DID NOT MEET THE 30-MINUTE REQUIRE-
16 MENTS AND I AM ASKING HIM TO EXPLAIN TO ME, IN EFFECT, HOW
17 IT FAILED TO COMPLY.

18 BY MR. SEDKY:

19 Q DO YOU UNDERSTAND THE QUESTION, MR. DI MASCIO?

20 A ARE YOU ASKING ME FOR MR. SEARS' INTERPRETATION
21 OF WHY IT DID NOT COMPLY?

22 Q WHATEVER HE EXPLAINED TO YOU. ARE YOU WAITING FOR

1 A QUESTION OR AM I WAITING FOR AN ANSWER?

2 A I BELIEVE YOU ARE WAITING FOR AN ANSWER.

3 Q OKAY.

4 A I AM STILL NOT CLEAR ON EXACTLY WHAT I AM ANSWERING.

5 Q I BELIEVE WE HAVE ESTABLISHED, AND I AM NOT TRYING
6 TO TESTIFY FOR YOU, THAT HE CALLED YOU AND TOLD YOU THAT IN
7 HIS VIEW DI MASCIO EXHIBIT NO. 2 FOR IDENTIFICATION DID NOT
8 COMPLY WITH THE REQUIREMENTS OF NUREG-0654; IS THAT CORRECT?

9 A THAT WAS THE SUMMATION OF THE CONVERSATION, WHETHER
10 OR NOT THOSE WERE HIS EXACT WORDS.

11 Q I UNDERSTAND THAT. I AM NOT TRYING TO GET HIS EXACT
12 WORDS. THE NEXT QUESTION TO YOU WAS IN WHAT WAY DID HE BELIEVE
13 THAT IT DID NOT COMPLY AND I BELIEVE YOUR ANSWER WAS THAT IT
14 DIDN'T COMPLY BECAUSE OF THE 30-MINUTE REQUIREMENTS OR WORDS
15 TO THAT EFFECT; IS THAT CORRECT?

16 A WORDS TO THAT EFFECT, YES.

17 Q IN WHAT MANNER, TO YOUR UNDERSTANDING, DOES DI MASCIO
18 EXHIBIT NO. 2 NOT COMPLY WITH THE 30-MINUTE REQUIREMENTS AS
19 PERCEIVED BY THE NRC STAFF?

20 MR. RUDLIN: THE QUESTION AS YOU JUST PHRASED IT IS THE
21 ONE THAT I RESPONDED TO EARLIER BECAUSE I WAS NOT CLEAR WHAT
22 YOU WERE ASKING. LET ME EXPLAIN. YOUR QUESTION AS JUST RECENTLY

1 PHRASED SEEMS TO ASK THE WITNESS TO COMPARE EXHIBIT 2 TO
2 NUREG-0654 AND DETERMINE WHERE THERE MAY BE DEVIATIONS IN
3 THE REQUIREMENTS.

4 MR. SEDKY: THAT IS NOT MY QUESTION.

5 MR. RUDLIN: THE QUESTION, I THINK, AND WHAT MAY BE CONFUSING
6 THE WITNESS, ASSUMES A PREMISE, AND THAT IS THAT DURING THE
7 TELEPHONE CONVERSATION MR. SEARS EXPLAINED IN DETAIL WHERE
8 THERE WERE 30-MINUTE REQUIREMENTS.

9 MR. SEDKY: THAT IS FINE. I THINK YOUR OBSERVATION IS
10 WELL TAKEN.

11 BY MR. SEDKY:

12 Q WAS THERE ANY DISCUSSION BETWEEN YOU AND MR. SEARS
13 AS TO IN WHAT MANNER DI MASCIO EXHIBIT NO. 2 FOR IDENTIFICATION
14 FAILED TO COMPLY WITH THE 30-MINUTE REQUIREMENTS?

15 A DO YOU MEAN DID HE EXPLAIN TO ME THE SPECIFIC REASON
16 WHY IT DID NOT? IS THAT WHAT YOU ARE ASKING?

17 Q I AM NOT SURE THAT I WANT TO BE SO SPECIFIC THAT
18 YOU CAN ANSWER THE QUESTION. I DON'T WANT YOU TO SAY "WELL,
19 HE DIDN'T USE THOSE WORDS." WHAT I AM TRYING TO FIND OUT
20 IS DID YOU HAVE AN UNDERSTANDING FROM WHATEVER HE TOLD YOU
21 AS TO IN WHAT WAY HE MEANT YOU HAD FAILED TO MEET THE 30-
22 MINUTE REQUIREMENTS. MR. DI MASCIO, YOU SEEM TO BE HAVING

1 A HARD TIME ANSWERING MY QUESTION. YOU HAVE BEEN SITTING SILENTLY
2 FOR SEVERAL MINUTES. DID YOU HAVE ANY UNDERSTANDING AS TO
3 WHAT HE MEANT WHEN HE SAID YOU FAILED TO MEET THE 30-MINUTE
4 REQUIREMENTS?

5 A I GUESS THE PROBLEM IS IT IS SIMPLE.

6 Q IF IT IS SIMPLE, JUST TELL ME HOW IT IS SIMPLE AND
7 WHAT IS IT.

8 A IT WAS MY UNDERSTANDING THAT TABLE B-1 REQUIRES
9 CERTAIN INDIVIDUALS WITHIN 30 MINUTES AND THIS TABLE SHOWS
10 THOSE PERSONNEL WITHIN 60 MINUTES.

11 Q BY REFERENCE TO DI MASCIO NO. 2 FOR IDENTIFICATION,
12 WHEN YOU TALKED ABOUT "SHOWS THOSE PERSONNEL WITHIN 60 MINUTES,"
13 IS THERE A COLUMN THERE THAT YOU CAN REFER TO?

14 A TABLE B-1 REQUIREMENTS WOULD BE THE THIRD COLUMN.
15 NOT THE THIRD. THE ONE ENTITLED "30 MIN."

16 Q WAS THE GIST OF MR. SEARS' COMMENT THAT THE PEOPLE
17 UNDER "LILCO 60 MIN." SHOULD BE AVAILABLE WITHIN 30 MINUTES?
18 IS THAT THE GIST OF HIS COMMENT TO YOU?

19 A MY UNDERSTANDING OF HIS CONCERN IS THAT WE DID NOT
20 SPECIFY SUFFICIENT PERSONNEL TO BE THERE WITHIN 30 MINUTES.

21 Q IF THAT IS AS COMPLETELY AS YOU CAN ANSWER, WE
22 WILL JUST HAVE TO GO THROUGH THIS ITEM BY ITEM AND IT MAY
TAKE A WHILE. WHY DON'T WE TRY TO DO THAT. LET'S LOOK NOW

1 AT THE FIRST LINE. IT SAYS "PLANT OPERATIONS AND ASSESSMENT
2 OF OPERATIONAL ASPECTS." DO YOU SEE THAT?

3 A YES, I DO.

4 Q THEN THERE ARE A NUMBER OF DESCRIPTIONS OF INDIVIDUALS
5 IN THE MAJOR COLUMN; IS THAT CORRECT?

6 A THERE IS A LIST OF --

7 Q DESCRIPTIONS OF POSITIONS. DO YOU SEE THAT?

8 A YES, I DO.

9 Q DO YOU SEE "SHIFT SUPERVISOR (SRO)"?

10 A I DO.

11 Q THE NEXT COLUMN SAYS "ON SHIFT" WITH AN ASTERISK;
12 RIGHT?

13 A YES, IT DOES.

14 Q WHAT DOES THAT COLUMN REPRESENT?

15 A THOSE WOULD BE THE PERSONNEL REQUIRED FOR TABLE
16 B-1 TO BE ON SHIFT.

17 Q THE NEXT COLUMN SAYS "LILCO ON SHIFT." WHAT DOES
18 THAT COLUMN REPRESENT?

19 A THOSE ARE THE PERSONNEL THAT LILCO HAS COMMITTED
20 TO BE ON SHIFT.

21 Q THE NEXT COLUMN SAYS "30 MIN."; CORRECT?

22 A CORRECT.

1 Q IS THAT A TABLE B-1 REQUIREMENT?

2 A THAT IS A TABLE B-1 REQUIREMENT.

3 Q THE NEXT COLUMN IS "60 MIN."; CORRECT?

4 A CORRECT.

5 Q IS THAT ALSO A TABLE B-1 REQUIREMENT?

6 A THAT IS A TABLE B-1 REQUIREMENT.

7 Q THE FINAL COLUMN SAYS "LILCO 60 MIN."; CORRECT?

8 A THAT IS CORRECT.

9 Q THAT IS THE NUMBER OF PERSONS THAT LILCO WOULD AUGMENT
10 WITHIN 60 MINUTES; IS THAT CORRECT?

11 A THAT IS A COMMITMENT OF LILCO PERSONNEL WITHIN 60
12 MINUTES.

13 Q SO AS I READ THIS TABLE, LOOKING ONLY AT THE LILCO
14 COMMITMENT, YOU COMMITTED TO HAVE -- LET'S TAKE ONE WHERE
15 THERE ARE SOME REAL NUMBERS. DO YOU SEE ACROSS FROM THE TERM
16 "HP TECHNICIANS"? DO YOU SEE THAT?

17 A I SEE IT.

18 Q LILCO COMMITS TO HAVE ONE LILCO PERSON ON SHIFT;
19 IS THAT CORRECT?

20 A THAT IS CORRECT.

21 Q THEN WITHIN 60 MINUTES LILCO COMMITS TO HAVE TWO
22 PERSONS; IS THAT CORRECT?

1 A THAT IS CORRECT.

2 Q JUST FOR MY EDUCATION, IS THAT TWO ADDITIONAL PERSONS
3 OR ONE ADDITIONAL PERSON?

4 A THAT WOULD BE TWO ADDITIONAL PERSONNEL.

5 Q IN ADDITION TO THE ONE THAT IS ALREADY ON SHIFT; IS
6 THAT CORRECT?

7 A THAT IS CORRECT.

8 Q IS IT A FAIR SUMMARY OF MR. SEARS' CONCERN THAT YOU
9 SIMPLY HAD NOTHING WITHIN 30 MINUTES? IS THAT RIGHT?

10 A I UNDERSTAND THAT TO BE HIS CONCERN.

11 Q THAT IS ALL I AM GETTING AT. FOR EXAMPLE, AS HE
12 READS TABLE B-1, IF YOU LOOK AT "HP TECHNICIANS" AT THE BOTTOM --
13 DO YOU SEE THAT ACROSS FROM "RADIATION PROTECTION"? AS HE
14 READS B-1, THERE WOULD BE TWO ON SHIFT AND THE CAPABILITY OF
15 ADDING TWO MORE WITHIN 30 MINUTES; IS THAT CORRECT?

16 A I DON'T KNOW HOW HE INTERPRETS B-1.

17 Q CONSISTENT WITH HIS COMMENT TO YOU, ISN'T IT FAIR TO
18 SAY THAT THAT IS HOW HE WOULD READ B-1?

19 A NO, IT IS NOT.

20 Q IT ISN'T. ALL RIGHT. HOW DO YOU READ B-1?

21 A FOR THAT SPECIFIC EXAMPLE THAT YOU JUST GAVE ME?

22 Q RIGHT.

A I READ TABLE B-1 FOR HP TECHNICIANS AT THE BOTTOM

1 AS A 2 WITH A DOUBLE ASTERISK, INDICATING THAT THE FUNCTION
2 OF THOSE TWO INDIVIDUALS MAY BE PERFORMED BY ANY TWO OTHER
3 INDIVIDUALS ON SHIFT.

4 Q THAT IS GOING TO ADD AN ELEMENT OF CONFUSION. LET'S
5 TAKE A SIMPLER CASE. LET'S TAKE THE SIMPLE CASE OF "OFFSITE
6 SURVEYS." DO YOU SEE THAT?

7 A YES.

8 Q B-1 DOES NOT REQUIRE ANYBODY ON SHIFT; IS THAT CORRECT?

9 A THAT IS CORRECT.

10 Q AS MR. SEARS WOULD READ B-1, YOU WOULD BE REQUIRED
11 TO HAVE EITHER TWO PERSONS OR SURVEYS, DEPENDING UPON HOW
12 YOU READ IT, WITHIN 30 MINUTES; IS THAT CORRECT?

13 A THAT IS MY UNDERSTANDING OF HOW HE WOULD READ IT.

14 Q I UNDERSTAND THAT.

15 A OKAY.

16 Q I AM NOT TRYING TO GET YOU TO COMMIT THAT HE IS
17 READING IT CORRECTLY. THE LILCO PLAN PROVIDES FOR EITHER
18 FOUR SURVEYS OR INDIVIDUALS WITHIN 60 MINUTES; IS THAT CORRECT?

19 A THAT IS CORRECT.

20 Q IT CONTAINS, AT LEAST ON THE FACE OF IT, NO PROVISION
21 FOR OUTSIDE SURVEYS WITHIN 30 MINUTES; IS THAT CORRECT?

22 A IT DOES NOT CONTAIN A COMMITMENT WITHIN 30 MINUTES.

1 Q JUST IN SUMMARY THEN, IS IT FAIR TO SAY THAT THE
2 GIST OF MR. SEARS' COMMENT WAS THAT LILCO DIDN'T COMMIT TO
3 ANY AUGMENTATION WITHIN 30 MINUTES?

4 A I BELIEVE THAT TO BE A CORRECT SUMMARY.

5 Q DO YOU RECALL ANY OTHER DISCUSSION WITH MR. SEARS
6 ABOUT TABLE B-1?

7 A NOT AT THIS TIME.

8 Q STILL STICKING WITH B-1, WHAT DID YOU HAVE TO SAY
9 TO MR. SEARS ON THAT SUBJECT DURING THESE CONVERSATIONS OR
10 THAT CONVERSATION?

11 A MY PROBLEM CAME WITH THE INTERPRETATION OF THE 30
12 MINUTES. WHAT I WAS TRYING TO ASCERTAIN WAS WHEN THE 30 MINUTES
13 OR WHEN THE CLOCK STARTED AND WHAT SEQUENCE.

14 Q WHAT DID HE SAY ABOUT THAT?

15 A I DO NOT RECOLLECT WHAT THE OUTCOME OF THAT WAS.

16 Q WHAT DID YOU TELL HIM ABOUT THAT?

17 A MY POINT OF CLARIFICATION WAS WHETHER OR NOT 30
18 MINUTES WAS AT THE DECLARATION OF THE EMERGENCY OR UPON ACTUALLY
19 CALLING OF A PERSON.

20 Q WAS THE POSITION YOU TOOK THAT IF IT IS 30 MINUTES
21 FROM THE TIME YOU CALL THE INDIVIDUAL, THEN THE 60 MINUTES
22 AUGMENTATION YOU HAVE IS SUFFICIENT?

1 A IF IT --

2 Q THAT THE TIME BEGINS TO RUN FROM THE TIME YOU CALL
3 THE INDIVIUDAL. WE ARE TALKING NOW ABOUT AUGMENTING ON SHIFT
4 PERSONNEL; ISN'T THAT CORRECT?

5 A YES.

6 Q WAS THE POINT YOU WERE TRYING TO MAKE THAT IF 30
7 MINUTES BEGINS TO RUN FROM THE TIME YOU CALL THE INDIVIDUAL
8 WHO IS TO AUGMENT THE SHIFT, THEN YOUR COLUMN LABELED "60
9 MIN.," IN EFFECT, IS 30 MINUTES FROM WHEN THAT PERSON IS CALLED?
10 WAS THAT THE POINT YOU WERE TRYING TO MAKE?

11 A I AM STILL CONFUSED WITH YOUR QUESTION.

12 Q OKAY. ASSUME THAT THE DECLARATION OF THE EMERGENCY
13 IS TIME ZERO AND YOU CALL THE INDIVIDUAL 30 MINUTES THERAFTER.
14 ALL RIGHT? THEN THE PERSON REPORTS WITHIN 30 MINUTES OF YOUR
15 CALL. WAS THAT THE POINT YOU WERE TRYING TO MAKE WITH HIM?
16 IN OTHER WORDS, IT WOULD BE A 30-MINUTE RESPONSE BUT WITHIN
17 60 MINUTES OF THE DECLARATION OF THE EMERGENCY?

18 A NO.

19 Q HOW IN YOUR MIND DID THE QUESTION OF WHEN THE CLOCK
20 STARTED AFFECT WHETHER OR NOT YOU COMPLIED WITH TABLE B-1?

21 A I WAS ONLY SEEKING FROM HIM AN INTERPRETATION AS
22 TO WHEN THE CLOCK STARTED. THAT'S ALL.

1 Q BUT THE TEXT OF NUREG-0654 SAYS ON ITS FACE THAT
2 THE AUGMENTATION TIME IS FROM THE DECLARATION OF THE EMERGENCY;
3 ISN'T THAT RIGHT?

4 A I WOULD HAVE TO READ THAT.

5 Q LET ME SHOW IT TO YOU. ON PAGE 35, I WILL JUST
6 QUOTE FROM IT AND SHOW IT TO YOU, IT SAYS "THE LICENSEE MUST
7 BE ABLE TO AUGMENT ON SHIFT CAPABILITIES WITHIN A SHORT PERIOD
8 AFTER DECLARATION OF AN EMERGENCY." LATER ON IT SAYS "ANY
9 DEFICIENCIES IN THE OTHER STAFFING REQUIREMENTS OF TABLE B-1
10 MUST BE CAPABLE OF AUGMENTATION WITHIN 30 MINUTES BY SEPTEMBER
11 1, 1981." LET ME SHOW YOU THAT LANGUAGE AND SEE IF THAT
12 HELPS YOU.

13 MR. DI MASCIO, HAVE YOU HAD AN OPPORTUNITY TO READ THE
14 PROVISION OF NUREG-0654 DEALING WITH THE AUGMENTATION WE WERE
15 DISCUSSING?

16 A YES, I HAVE.

17 Q IN LIGHT OF WHAT IT SAYS, DOES THAT ASSIST YOU IN
18 ANSWERING MY QUESTION, WHICH IS WHETHER OR NOT THE REGULATION
19 IS FAIRLY CLEAR THAT IT IS THE DECLARATION OF AN EMERGENCY
20 THAT STARTS THE CLOCK RUNNING?

21 A I STILL SEE MY QUESTION OF AN INTERPRETATION AS
22 WHEN THE CLOCK STARTS TO BE ONE THAT IS VALID.

Q I GUESS WHAT IS BOTHERING ME A LITTLE BIT IS THAT

1 IF YOUR INTERPRETATION IS ACCURATE, ARE YOU SAYING THAT IN
2 YOUR TABLE 5-1, WHICH IS DI MASCIO EXHIBIT NO. 2 FOR IDENTIFI-
3 CATION, THAT THE 60-MINUTE AUGMENTATION IS 60 MINUTES FROM
4 THE TIME THE PERSON IS CALLED?

5 A I AM TRYING TO SEEK INTERPRETATION.

6 Q AS IT IS PRESENTLY SET FORTH, IN OTHER WORDS, WHEN
7 YOU SAY IN DI MASCIO NO. 2 THAT AN ADDITIONAL -- WHICH IS
8 THE ONE WE TALKED ABOUT BEFORE? AN ADDITIONAL HP TECHNICIAN,
9 NOT THE ONE WITH THE ASTERISK BUT THE OTHER ONE. AN ADDITIONAL
10 TWO TECHNICIANS, ONE ON SHIFT AND AN ADDITIONAL TWO WITHIN
11 60 MINUTES. AS YOU UNDERSTAND IT, WHEN DOES THE CLOCK RUN
12 FOR THAT 60 MINUTES?

13 A MY UNDERSTANDING AND MY INTERPRETATION OF THAT IS
14 THAT THE CLOCK WOULD START WHEN NOTIFIED.

15 Q WHEN THE INDIVIDUALS ARE NOTIFIED?

16 A YES.

17 Q I SEE. SO YOU HAVE REALLY TWO KINDS OF -- I DON'T
18 WANT TO CALL THEM DISPUTES -- AREAS UNDER DISCUSSION NOW WITH
19 THE NRC STAFF. ONE HAS TO DO WITH 30 MINUTES AND, IN ADDITION,
20 WHEN DOES THE 30 MINUTES BEGIN TO RUN. IS THAT FAIR?

21 A NO. I STILL SEE IT AS AN INTERPRETATION ON MY OWN
22 PART FROM THE NRC AS TO 0654.

1 Q WAIT A SECOND. AS I UNDERSTOOD MR. SEARS' CONCERN,
2 IT WAS THAT YOU HAVE NO COMMITMENT TO AUGMENTATION WITHIN
3 30 MINUTES IRRESPECTIVE OF WHEN THE CLOCK STARTS; IS THAT
4 CORRECT?

5 A THAT IS UNCLEAR TO ME BECAUSE I AM STILL TRYING
6 TO GET AN INTERPRETATION OF WHEN THE CLOCK STARTS.

7 Q SUPPOSE THE INTERPRETATION CAME OUT YOUR WAY, JUST
8 FOR THE SAKE OF DISCUSSION, AND THAT MR. SEARS SAID "DESPITE
9 WHATEVER THE NUREG SAYS, IT IS SUPPOSED TO BE AFTER THE DE-
10 CLARATION OF AN EMERGENCY," THAT YOU PERSUADED HIM WHAT IT
11 REALLY MEANS IS AFTER THE GUY WAS CALLED SO WE ARE NOW TALKING
12 30 MINUTES FROM THEN. WOULD YOU THEN CHANGE THIS TABLE TO
13 SHOW LILCO 30 MINUTES OR WOULD YOU HAVE A DIFFERENT COLUMN
14 FOR LILCO 30 MINUTES OR WHAT?

15 A FIRST OF ALL, I DON'T THINK I PERSUADED THE NRC
16 IN THEIR INTERPRETATION. I ONLY GET INTERPRETATIONS FROM
17 THEM.

18 Q OKAY. SECOND OF ALL WHAT?

19 A WOULD YOU REASK THE QUESTION ON THE SECOND PART?

20 Q ASSUMING YOU ARE CORRECT OR ASSUMING THE NRC ADOPTS
21 YOUR INTERPRETATION OR THAT IS ITS INTERPRETATION ALL ALONG
22 THAT THE CLOCK STARTS WHEN THE INDIVIDUAL IS CALLED TO AUGMENT

1 THE INDIVIDUAL -- DO YOU HAVE THAT IN MIND?

2 A YES, I DO.

3 Q -- THAT MEANS THAT THE CLOCK STARTS WHEN YOU CALL.
4 ISN'T IT A FACT THAT DI MASCIO EXHIBIT NO. 2 STILL CONTAINS
5 NO AUGMENTATION WITHIN 30 MINUTES?

6 A IT DOES NOT HAVE A COMMITMENT WITHIN 30 MINUTES.

7 Q SO LILCO HAS NO COMMITMENT TO AUGMENT WITHIN 30
8 MINUTES IRRESPECTIVE OF WHEN THE TIME STARTS; ISN'T THAT CORRECT?
9 ISN'T THAT WHAT WE JUST FINISHED SAYING?

10 A RIGHT.

11 Q FURTHERMORE, THE QUESTION OF WHEN THE CLOCK STARTS
12 IS STILL UP IN THE AIR EVIDENTLY; IS THAT CORRECT?

13 A WITH MYSELF, YES.

14 Q DO YOU HAVE AN OPINION AS YOU SIT HERE TODAY AS
15 TO WHETHER OR NOT LILCO WOULD BE ABLE TO AUGMENT WITHIN 30
16 MINUTES IF THE CLOCK STARTED AT THE DECLARATION OF AN EMERGENCY?

17 A IF THE CLOCK STARTED AT THE DECLARATION OF AN EMERGENCY?

18 Q CORRECT.

19 MR. RUDLIN: ARE YOU ASKING GENERALLY OR WITH RESPECT
20 TO ANY PARTICULAR POSITION?

21 MR. SEDKY: GENERALLY. IN OTHER WORDS, DOES HE HAVE
22 A VIEW AS TO WHETHER OR NOT THEY COULD COMMIT TO AUGMENTING

1 WITHIN 30 MINUTES ALL UP AND DOWN THE SCHEDULE. IF HE SAYS
2 YES AS TO SOME AND NO AS TO OTHERS, I GUESS WE WILL PURSUE
3 THAT.

4 MR. RUDLIN: I WILL OBJECT. I THINK THAT CALLS ON THE
5 WITNESS TO SPECULATE.

6 MR. SEDKY: SUBJECT TO THE OBJECTION.

7 THE WITNESS: I THINK THAT CALLS FOR SPECULATION ON MY
8 PART THAT I AM NOT PREPARED TO MAKE.

9 BY MR. SEDKY:

10 Q GIVE ME YOUR BEST JUDGMENT.

11 A I AM NOT SURE.

12 Q THAT IS THE ANSWER TO THE QUESTION, RIGHT, THAT
13 YOU ARE NOT SURE?

14 A TO WHICH QUESTION?

15 MR. SEDKY: LET'S READ IT BACK. THE PENDING QUESTION
16 IS DO YOU HAVE AN OPINION.

17 (THE QUESTION WAS READ BY THE REPORTER.)

18 BY MR. SEDKY:

19 Q I AM JUST NOT SURE WHETHER YOU ANSWERED THE QUESTION
20 OR WHETHER YOU WERE SAYING YOU WERE NOT SURE YOU UNDERSTOOD
21 IT OR YOU WERE NOT SURE THAT YOU COULD ANSWER IT. MY QUESTION
22 IS ARE YOU NOT SURE THAT LILCO COULD AUGMENT ALL UP AND DOWN

1 THE SCHEDULE WITHIN 30 MINUTES?

2 A NO, I WAS NOT ANSWERING THE QUESTION SAYING THAT
3 I AM NOT SURE OF THAT.

4 Q CAN YOU ANSWER THE QUESTION?

5 A I DON'T BELIEVE I CAN ANSWER THAT.

6 Q WHY NOT?

7 A THAT INVOLVES SPECULATION.

8 Q WHY DOES IT INVOLVE SPECULATION?

9 A THAT OPINION INVOLVES SPECULATION ON MY PART.

10 Q YOU ARE THE ONSITE DIRECTOR OF EMERGENCY PLANNING,
11 AREN'T YOU?

12 A I AM.

13 Q WE ARE TALKING ABOUT THE CAPABILITY OF LILCO TO
14 AUGMENT ITS ONSITE STAFF; ISN'T THAT CORRECT?

15 A THAT IS CORRECT.

16 Q ARE YOU SAYING THAT YOU HAVE NO OPINION AS TO WHETHER
17 OR NOT LILCO COULD COMMIT TO AUGMENT ITS ONSITE STAFF WITHIN
18 30 MINUTES OF THE DECLARATION OF AN EMERGENCY? IN OTHER WORDS,
19 WITHIN 30 MINUTES OF THE DECLARATION OF AN EMERGENCY.

20 A IT WOULD BE MY OPINION THAT IT MIGHT BE AN UNREALISTIC
21 COMMITMENT TO MAKE.

22 Q UNREALISTIC IN THE SENSE THAT IT MAY NOT BE CAPABLE

1 OF BEING IMPLEMENTED?

2 A IT WOULD BE MY OPINION THAT IT WOULD BE UNREALISTIC
3 TO COMMIT TO 30 MINUTES.

4 Q DO YOU HAVE A VIEW AS TO WHY IT WOULD BE UNREALISTIC?

5 A ONCE AGAIN, IT IS SPECULATION.

6 Q DO YOU HAVE A VIEW OR NOT? DO YOU HAVE A VIEW,
7 MR. DI MASCIO?

8 A WOULD YOU REPHRASE A VIEW ON WHAT, PLEASE?

9 Q ON WHY IT WOULD BE UNREALISTIC TO COMMIT TO AUGMENT-
10 ING THE STAFF WITHIN 30 MINUTES OF THE DECLARATION OF AN EMERGENCY.
11 ARE YOU GOING TO ANSWER THE QUESTION, MR. DI MASCIO?

12 A YES, I AM. IN MY VIEW, TO COMMIT TO THAT 30-MINUTE
13 AUGMENTATION AT THE DECLARATION OF AN EMERGENCY 365 DAYS A
14 YEAR, 24 HOURS A DAY WOULD BE UNREALISTIC.

15 Q I STILL DON'T UNDERSTAND WHAT YOU MEAN BY "UNREALISTIC."
16 YOU MEAN TOO EXPENSIVE? IS THAT WHAT YOU MEAN?

17 A NO, I DON'T.

18 Q THEN WHY?

19 A WHEN YOU TAKE INTO ACCOUNT THE DISTANCE PERSONNEL
20 MAY LIVE AWAY FROM HOME AND THE NORMAL TIME IT MAY TAKE TO
21 ARRIVE.

22 Q WHAT YOU ARE SAYING IS YOU DON'T THINK IT CAN BE

1 DONE?

2 A I THINK IT WOULD BE UNREALISTIC TO COMMIT TO IT.

3 Q GIVEN WHAT? THE DISTANCES AND THE TIME AND TRAFFIC
4 AND THINGS LIKE THAT?

5 A GIVEN THE DISTANCE.

6 Q JUST GIVEN THE DISTANCE ALONE, YOU ARE SAYING THAT
7 THAT WOULD BE UNREALISTIC?

8 A AND THE NORMAL TIME, YES.

9 Q AND THE NORMAL TIME THAT IT TAKES TO GET TO THE
10 PLANT FROM THE HOME?

11 A THAT IS CORRECT.

12 Q THAT IS UNCOMPLICATED BY UNUSUAL TRAFFIC CONGESTION,
13 FOR EXAMPLE?

14 A AGAIN, I SAID IT IS UNREALISTIC TO COMMIT TO IT.

15 Q I UNDERSTAND WHAT YOU ARE SAYING. I AM TRYING TO
16 GET THE PARAMETERS, THE VARIABLES THAT GO INTO YOUR VIEW THAT
17 IT IS UNREALISTIC OR WOULD BE UNREALISTIC. WE ARE TALKING
18 ABOUT DISTANCE AWAY FROM THE PLANT AND JUST NORMAL DRIVING
19 TIME; IS THAT RIGHT?

20 A THAT IS RIGHT.

21 MR. RUDLIN: I NEED TO MAKE A PHONE CALL WHEN YOU GET
22 TO A GOOD STAGE.

1 MR. SEDKY: THIS IS A GOOD TIME.

2 (BRIEF RECESS.)

3 BY MR. SEDKY:

4 Q MR. DI MASCIO, JUST BEFORE THE BREAK, WE WERE TALKING
5 ABOUT THE DISTANCES AND TIME INVOLVED IN GETTING FROM PEOPLE'S
6 HOMES TO THE PLANT; CORRECT?

7 A YES.

8 Q IT WAS THOSE FACTORS THAT LED YOU TO BELIEVE THAT
9 THE 30-MINUTE AUGMENTATION FROM THE DECLARATION OF THE EMERGENCY
10 WOULD BE UNREALISTIC; IS THAT RIGHT?

11 A AS A COMMITMENT, YES.

12 Q IF IT IS THE DISTANCE AND COMMUTING TIME THAT
13 IS A PROBLEM IN YOUR EYES, THAT WOULD BE TRUE WHETHER THE
14 CLOCK BEGAN AT THE DECLARATION OR WHEN THEY WERE PHONED; ISN'T
15 THAT RIGHT? LET ME SEE IF I CAN MAKE IT CLEARER FOR YOU.
16 IF IT TAKES MORE THAN 30 MINUTES TO DRIVE FROM POINT X TO
17 THE PLANT, THEN IT TAKES MORE THAN 30 MINUTES TO DRIVE THAT
18 DISTANCE AND THAT IS TRUE WHETHER YOU CALL THEM IMMEDIATELY
19 UPON DECLARATION OR SOME POINT AFTER THAT; ISN'T THAT RIGHT?

20 A YES.

21 Q IS IT YOUR UNDERSTANDING THAT THERE WOULD BE A LAG
22 BETWEEN THE TIME AN EMERGENCY IS DECLARED AND THE AUGMENTATION
STAFF IS CALLED?

1 A THERE IS SOME TIME NECESSARY.

2 Q SOME TIME NECESSARY TO CALL THE INDIVIDUALS; RIGHT?

3 A RIGHT.

4 Q IN THE CASE OF A 30-MINUTE AUGMENTATION AS PER TABLE
5 B-1, WE ARE TALKING ABOUT ROUGHLY A DOZEN INDIVIDUALS; ISN'T
6 THAT RIGHT?

7 A WHICH TIME FRAME? I AM SORRY.

8 Q 30 MINUTES.

9 A YES.

10 Q HAVE YOU ESTIMATED HOW LONG IT WOULD TAKE TO MAKE
11 THOSE CALLS?

12 A I HAVE NOT.

13 Q HAVE YOU IDENTIFIED THE INDIVIDUALS WHO WOULD BE
14 MAKING THE CALLS?

15 A YES.

16 Q IS IT ONE PERSON OR MORE THAN ONE?

17 A DEPENDING ON THE LEVEL OF THE EMERGENCY AND THE
18 TIME INTO THE EMERGENCY. IT VARIES.

19 Q IN RESPECT OF THE 60-MINUTE AUGMENTATION AS TO WHICH
20 LILCO IS ABLE TO COMMIT AS SHOWN ON DI MASCIO EXHIBIT 2 FOR
21 IDENTIFICATION, HOW MANY PEOPLE ARE CONTEMPLATED TO BE INVOLVED
22 IN CALLING THOSE INDIVIDUALS?

1 A PER THE PRESENT PROCEDURE ONE. I WOULD LIKE TO
2 CLARIFY THAT. FOR THE PRESENT PROCEDURE ONE, WHO IN TURN
3 WHEN HE MAKES A CALL THAT PERSON IN TURN WOULD MAKE OTHER
4 NOTIFICATIONS SO THAT IT WOULD CASCADE.

5 Q I UNDERSTAND. IS IT ALL MAPPED OUT ALREADY IN THE
6 PROCEDURES? IN OTHER WORDS, THE ONSITE PERSON WHO MAKES THE
7 FIRST TELEPHONE CALL IS GOING TO CALL MR. X, WHO IN ADDITION
8 TO ARRIVING WITHIN 60 MINUTES IS TO CALL MR. Y AND MR. Z,
9 THAT KIND OF THING?

10 A YES.

11 Q ARE THERE REDUNDANCIES BUILT INTO THAT? IN OTHER
12 WORDS, IF SOMEBODY IS NOT AT HOME, DO YOU HAVE SOMEBODY ELSE
13 CALL?

14 A WE HAVE ALTERNATES.

15 Q HAVE YOU IDENTIFIED THE INDIVIDUALS WHO ACTUALLY
16 WOULD BE RESPONDING WITHIN THE 60 MINUTES THAT YOU HAVE
17 ESTABLISHED SO FAR?

18 A YES, WE HAVE. I WOULD SAY WE HAVE EVEN IDENTIFIED
19 THE POSITION.

20 Q AS I UNDERSTAND THAT, ALL THOSE POSITIONS ARE PRESENTLY
21 OCCUPIED BY INDIVIDUALS. IN OTHER WORDS, IF YOU WERE TO MAKE
22 A CALL TODAY, HYPOTHETICALLY YOU WOULD KNOW WHO TO CALL?

1 A YES.

2 Q ARE THERE ANY POSITIONS THAT ARE NOT YET FILLED THAT
3 WOULD BE AUGMENTED WITHIN 60 MINUTES?

4 A NO.

5 Q ON THE ASSUMPTION THAT THE PEOPLE WHO ARE PRESENTLY
6 OCCUPYING THE POSITIONS THAT WOULD BE AUGMENTING THE ON SHIFT
7 PERSONNEL WITHIN 60 MINUTES, ARE YOU ABLE TO TELL US DISTANCES
8 AWAY FROM THE PLANT THESE INDIVIDUALS ARE, TAKING THE NEAREST
9 AND THE FURTHEST AS AN EXTREME?

10 A NOT AT THIS TIME.

11 Q HAVE YOU DONE THAT WORK BUT YOU JUST DON'T HAVE
12 IT IN YOUR MIND OR IT JUST HASN'T BEEN DONE YET?

13 A IT IS IN THE PROCESS OF BEING DONE.

14 Q IN OTHER WORDS, YOU ARE NOW IDENTIFYING WHO HOLDS
15 THOSE POSITIONS THAT WOULD BE RESPONDING AND WHERE THEY LIVE;
16 IS THAT RIGHT?

17 A THAT'S CORRECT.

18 Q DO YOU HAVE AN ESTIMATE AS TO WHEN THAT EFFORT WILL
19 BE COMPLETED?

20 A WITHIN A MONTH OR SO.

21 Q WHEN YOU REFERRED IN YOUR VERY EARLY ANSWER TO GENERIC
22 PHILOSOPHY ABOUT 30 MINUTES, WAS THE PHILOSOPHY YOU ARE REFERRING
TO THE ISSUE OF WHEN THE CALL WAS TO BE MADE OR WHAT? I AM

1 SORRY. WAS THE PHILOSOPHY THE ISSUE OF WHEN THE CLOCK STARTED
2 TO RUN?

3 A THAT WAS PART OF IT.

4 Q THAT WAS THE OTHER PART OF THE QUESTION OF HOW REALISTIC.
5 IT WAS TO AUGMENT WITHIN 30 MINUTES?

6 A I BELIEVE SO.

7 Q DO YOU RECALL ANYTHING ABOUT MR. SEARS' REACTION
8 TO THOSE TWO TOPICS, NAMELY, WHEN THE TIME STARTS AND HOW
9 REALISTIC IT WAS TO AGUMENT WITHIN 30 MINUTES?

10 A BASICALLY, I HAD THE IMPRESSION THAT THAT IS THE
11 WAY IT IS WRITTEN.

12 Q IN OTHER WORDS, IT IS 30 MINUTES AND IT IS FROM
13 THE DECLARATION OF THE EMERGENCY?

14 A NO. I DON'T REMEMBER THE SPECIFIC RESOLUTION ON
15 THE INTERPRETATION OF START OF THE CLOCK.

16 Q THE WAY IT IS WRITTEN IS 30 MINUTES?

17 A UNREALISTIC VERSUS REALISTIC.

18 Q HIS CONCLUSION IS THAT IS THE WAY IT IS WRITTEN,
19 IN EFFECT?

20 A YES.

21 Q BY THAT, HE IS REFERRING TO THE 30-MINUTE REQUIREMENT?

22 A THAT'S CORRECT.

1 Q ANYTHING ELSE YOU RECALL ABOUT THE CONVERSATION WITH
2 MR. SEARS ON TABLE B-1 OTHER THAN WHAT YOU HAVE TESTIFIED
3 TO?

4 A NO.

5 Q HAVE WE EXHAUSTED YOUR RECOLLECTION ON THAT TOPIC
6 OF THE CONVERSATION?

7 A YES, WE HAVE.

8 Q YOU ALSO SAID THAT YOU TALKED WITH MR. SEARS ABOUT
9 THE INITIATING CONDITIONS. DO YOU RECALL THAT?

10 A YES, I DO.

11 Q DO YOU REMEMBER WHETHER THIS WAS THE SAME CONVERSATION
12 WITH RESPECT TO WHICH YOU ALSO DISCUSSED TABLE B-1 OR WAS
13 IT A DIFFERENT CONVERSATION?

14 A I DO NOT RECOLLECT.

15 Q YOU DON'T RECALL. DO YOU RECALL WHO INITIATED THE
16 TOPIC? WAS IT YOU OR HIM? "THE TOPIC" BEING THE INITIATING
17 CONDITIONS.

18 A I DON'T RECOLLECT THAT EITHER.

19 Q GIVE US YOUR BEST RECOLLECTION OF WHAT HE SAID TO
20 YOU AND WHAT YOU SAID TO HIM ABOUT THE INITIATING CONDITIONS
21 IN SUBSTANCE. I KNOW YOU CAN'T REMEMBER EVERY WORD.

22 A ACTUALLY, THIS ONE IS EASIER. HE SAID TO ME THAT

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)

LONG ISLAND LIGHTING COMPANY)
)

(Shoreham Nuclear Power Station,)
Unit 1))
_____)

Docket No. 50-322 (OL)
(Emergency Planning
Proceedings)

CERTIFICATE OF SERVICE

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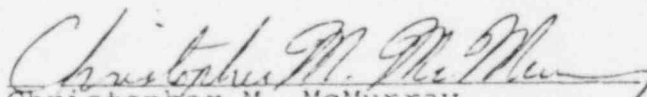
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