

'83 APR -1 11:17

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,)	
Unit 1))	

MOTION TO INCLUDE AN
ADDITIONAL EXHIBIT IN
THE QA/QC RECORD

During cross-examination of the NRC Staff QA/QC witness panel, questions were asked concerning the LILCO QA audits reviewed by the witnesses in preparation for cross-examination. During the hearings, LILCO suggested and the Board concurred that the parties should agree on a list and move it into evidence by stipulation.

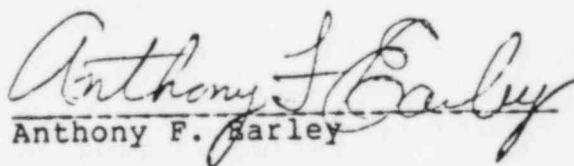
Counsel for LILCO prepared such a list and submitted it to counsel for Suffolk County and the NRC Staff on December 23, 1982 (Enclosure 1). On January 3, 1983, the Staff replied, indicating the list was correct. No reply was received from the County.

At hearings during the week of February 24, counsel for LILCO asked counsel for the County about the list and was informed that it had not yet been reviewed. By letter dated March 7, 1983 (Enclosure 2), LILCO renewed its request that the

County indicate its agreement or disagreement with the list. No reply was received. During the week of March 21, counsel for LILCO again talked to County's counsel about the list and was informed that the County did not intend to review the list until after April 7.

Although LILCO did not need the list as part of its Proposed Findings of Fact on SC/SOC 7B, the possibility exists that it may prove useful in the upcoming filings by the County, NRC Staff and LILCO. Therefore, based on Mr. Bordenick's representations in his letter of January 3, 1983, LILCO moves to have the "List of LILCO/S&W Audits Reviewed by NRC Staff Witnesses in Preparation for Oral Testimony" admitted into evidence in this proceeding.

Respectfully Submitted,
LONG ISLAND LIGHTING COMPANY


Anthony F. Barley

Hunton & Williams
P.O. Box 1535
Richmond, Virginia 23212

DATE: March 30, 1983

HUNTON & WILLIAMS

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FILE NO. 24566.3

DIRECT DIAL NO. 804-788-8361

December 23, 1982

Lawrence Coe Lanpher, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
8th Floor
Washington, D.C. 20036

Bernard M. Bordenick, Esq.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dear Larry and Bernie:

During our cross-examination of the Staff QA panel, we asked the witnesses about which LILCO QA audits and quarterly reports they had reviewed in preparation for their oral testimony (Tr. 17,323). They said they had reviewed the material listed in Larry's December 2 letter and December 10 memo. Earlier in the cross-examination, I believe they also said they had looked at the Quarterly Reports in SC Exhibit 63. The enclosed list is a summary of the LILCO audits and Quarterly Reports contained in those documents. This is the same list that we gave you on Wednesday, December 22.

I would appreciate it if Bernie could have the witnesses review the list to verify its accuracy. Assuming it is correct, we will move the list into evidence, as we had previously indicated (Tr. 17,323). Please let me know if you have any problems with this proposal so we can work them out.

HUNTON & WILLIAMS

Lawrence Coe Lanpher, Esq.
Bernard M. Bordenick, Esq.
December 23, 1982
Page Two

Best wishes for the holidays.

Sincerely,

/s/

Anthony F. Earley, Jr.

221/765
Enclosure



ENCLOSURE 2
UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 3, 1983

Anthony F. Earley, Jr., Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

In the Matter of
Long Island Lighting Company
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322 (OL)

Dear Mr. Earley:

This is to advise that the "List of LILCO/S&W Audits Reviewed by NRC Staff Witnesses in Preparation for Oral Testimony", which was attached to your letter addressed to me and Larry Lanpher dated December 23, 1982, is accurate.

Sincerely,

A handwritten signature in black ink that reads "Bernard M. Bordenick".

Bernard M. Bordenick
Counsel for NRC Staff

cc: Lawrence Brenner, Esq.
Dr. Peter A. Morris
Ralph Shapiro, Esq.
W. Taylor Reveley III, Esq.
Stephen B. Latham, Esq.
Herbert H. Brown, Esq.
Atomic Safety and Licensing
Board Panel
Karla Letsche, Esq.
Edward M. Barrett, Esq.
Marc W. Goldsmith
Mr. Jeff Smith
Hon. Peter Cohalan
Docketing and Service Section

Dr. James L. Carpenter
Matthew J. Kelly, Esq.
Howard L. Blau, Esq.
Cherif Sedkey, Esq.
John F. Shea, III, Esq.
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Atomic Safety and Licensing
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Mr. Jay Dunkleberger

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March 7, 1983

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FILE NO. 24566.3

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Washington, D.C. 20036

Dear Larry:

During the last week of hearings on Long Island, we discussed the list I sent you in December concerning the LILCO audits reviewed by the NRC Staff QA witnesses. You had not reviewed the list. For your convenience, I've enclosed a copy of my December 23 letter. Bernie Bordenick has informed me that the listing attached to the letter is accurate. I would appreciate it if you would review the list and let me know if you concur so it can be submitted to the Board as promised (Tr. 17,323).

Sincerely,



Anthony F. Earley, Jr.

221/765
Enclosure

LIST OF LILCO/S&W AUDITS REVIEWED
BY NRC STAFF WITNESSES IN
PREPARATION FOR ORAL TESTIMONY

Audits listed in December 2, 1982, letter from L. Lanpher to B. Bordenick:

FQC 21, B.9, D. 14	F.A. 803, 4.1
F.A. 340, 4.1	FQC 34, N.2
F.A. 376, 4.3	F.A. 1275, 4.2
F.A. 679, 4.2	F.A. 1086, 4.1, 4.2
F.A. 699, 4.1	F.A. 1180, 4.1, 4.3
F.A. 721, 4.3	F.A. 1301, 4.1
FQC 21, D.18	F.A. 1313, 4.1, 4.2
FQC 23, D.5(2)	Quarterly Report 5/30/80
F.A. 443, 4.1	Quarterly Report 7/22/80
F.A. 679, 4.3	Quarterly Report 11/13/80
F.A. 740, 4.2	Quarterly Report 2/17/81
	Quarterly Report 8/31/81
	Quarterly Report 12/3/81

Audits listed in December 10, 1982, handwritten memo from L. Lanpher to B. Bordenick:

EA 19, 2.B.2
EA 22, 021(2)
EA 23, 037
EA 27, 078
FQC 14, A.1
FQC 14, B.2, D.2, D.3, D.4
EA 18, p.2 #4
EA 30, 104(4)
EA 38, 141(1)-(2)

Quarterly Reports listed in SC Exhibit 63:

May 4, 1978
August 31, 1978
November 3, 1978
January 29, 1979
April 16, 1979
August 20, 1979
May 30, 1980
July 22, 1980
November 13, 1980
February 17, 1981
August 31, 1981
December 3, 1981

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CERTIFICATE OF SERVICE

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

I hereby certify that copies of Motion to Include an Additional Exhibit in the QA/QC Record and Additional Transcript Corrections were served this date upon the following by first-class mail, postage prepaid.

Lawrence Brenner, Esq.
Administrative Judge
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U.S. Nuclear Regulatory
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Administrative Judge
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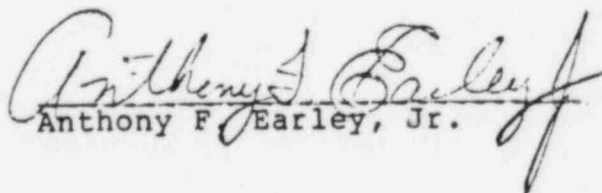
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DATED: March 30, 1983