

LILCO, August 25, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY) Docket No. 50-322 (OL) - 3
)
(Shoreham Nuclear Power Station,)
Unit 1))

LILCO INTERROGATORIES AND REQUESTS FOR ADMISSIONS
AND PRODUCTION OF DOCUMENTS DIRECTED TO SUFFOLK COUNTY

DEFINITION FOR USE IN ANSWERING REQUESTS FOR
ADMISSION, INTERROGATORIES AND PRODUCTION OF DOCUMENTS

The term "Suffolk County" means Suffolk County, and any agent, employee, consultant, contractor, technical advisor, representative (including, without limitation, attorneys and accountants and their respective agents and employees), or other person acting for or on behalf of Suffolk County, or at Suffolk County's direction and control, or in concert with Suffolk County or assisting Suffolk County.

I. REQUESTS FOR ADMISSION

Pursuant to 10 C.F.R. § 2.742, Suffolk County is requested by LILCO to admit the following facts:

1. That the list of witnesses provided on July 22, 1983 in answer to LILCO's informal discovery requests 1 and 2 of July 13, 1983 remains the complete list of persons whom

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Suffolk County intends to call as witnesses on emergency planning issues.

2. That the studies and other documents provided by Suffolk County in their responses through August 22 to LILCO informal discovery requests dated June 29, July 6, July 13, July 21 and July 25, 1983 constitute the complete list of studies and other documents which will be relied on by Suffolk County in its prefiled direct testimony on emergency planning in this proceeding or exhibits thereto, in cross-examination thereon, or in rebuttal testimony (if any) or exhibits thereto.
3. That the consulting firm of PRC Voorhees prepared for the Suffolk County RERP Steering Committee a document entitled "Suffolk County Radiological Emergency Response Plan," Working Draft Report, dated November 1982.
4. That PRC Voorhees prepared for the Suffolk County RERP Steering Committee a document entitled "Preliminary Evacuation Time Estimates for the Shoreham EPZ," dated November 1982.
5. That Suffolk County does not intend to present as witnesses any persons who prepared either or both of the documents listed in Requests for Admission 3 and 4 above, in the presentation of its case on Emergency Planning issues in this proceeding.

6. That Suffolk County does not intend to rely (a) on the document listed in Request for Admission 3, or (b) on work underlying it, in the presentation of its case on Emergency Planning issues in this proceeding.
7. That Suffolk County does not intend to rely (a) on the document listed in Request for Admission 4, or (b) on work underlying it, in the presentation of its case on Emergency Planning issues in this proceeding.
8. That Suffolk County does not intend to rely on the PRC Voorhees report identified in Request 4, or on work underlying it, for support for any of the following propositions:
 - (a) LILCO's evacuation time estimates are unreliable and should be far longer (SC Revised Contention 65);
 - (b) only a limited east-west roadway network is available for evacuation;
 - (c) "it will likely take at least from one to more than three hours for people to mobilize before they can begin to evacuate" (SC Revised Contention 65.A);
 - (d) "[h]eavy traffic congestion from mobilization traffic, due to both high demand and conflicting traffic flow . . . will lengthen evacuation times" (SC Revised Contention 65.B);

- (e) "LERO mobilization will take at least several hours" (SC Revised Contention 27), including
 - (i) mobilization of bus drivers,
 - (ii) mobilization of road crews,
 - (iii) mobilization of emergency response personnel living outside the EPZ, and
 - (iv) mobilization of fuel truck and route alert drivers;
- (f) LILCO has underestimated the number of persons to be served by buses (SC Revised Contention 67.A);
- (g) "LILCO's 'estimated route times' for the evacuation buses to reach the transfer points are also unrealistically low in that they fail to take into account the congested conditions that exist" (SC Revised Contention 67.C);
- (h) "[a]s a result of the time necessary to complete the evacuation, persons may be exposed to health-threatening radiation doses" (SC Revised Contention 67);
- (i) early dismissal of school children will take substantially longer than predicted by LILCO, and "[a]n evacuation of schools, using LILCO employees as bus drivers, would take too long and children would not be

adequately protected from health threatening radiation doses" (SC Revised Contention 71.B);

- (j) evacuation of people from special facilities (SC Revised Contention 72.A) and handicapped people at home (SC Revised Contention 73.B) would take too long and these people would receive health threatening doses of radiation; and
- (k) ambulances will be unable to respond when needed due to severe traffic congestion during evacuation.

II. INTERROGATORIES

A. Supplement To Requests For Admission

As to each request for admission numbered 1 through 8 above, or portion thereof, to which the answer is anything other than an unqualified affirmative admission, Suffolk County is requested by LILCO, pursuant to 10 C.F.R. § 2.740b, to state the following, within fourteen (14) days after service hereof, using the same instructions for answering interrogatories as are set forth on pages 1 through 11 of "Suffolk County Interrogatories to Long Island Lighting Company," dated August 19, 1983:

1. State each exact portion of each request for admission not admitted;

2. With respect to each such unadmitted portion of each request for admission referred to in the answer to interrogatory 1 above: (a) state the reason it is not admitted; (b) state the name of each expected witness with respect to the area not admitted; (c) state the name of each person, not a witness, serving as a consultant on the area not admitted; (d) state the titles and authors of any studies completed to date by, for, or on behalf of Suffolk County respecting the area not admitted; (e) state the titles, subject matters and authors of any studies by, for, or on behalf of Suffolk County presently in progress or specifically anticipated on the area not admitted; and (f) state the title and author of each other document relied on or to be relied on by Suffolk County with respect to answers 2(a) through 2(f). If the answer includes a reference to any of Suffolk County's Revised Emergency Planning Contentions, please also answer questions 2(a) through 2(f) specifically without reference to such Revised Contentions or state that no support for the answer exists apart from the literal text of such Revised Contentions.

B. Other Interrogatories

3. Has Suffolk County performed or had performed, or is Suffolk County now performing or having performed, or is Suffolk County relying or intending to rely on, an evacuation analysis, including but not limited to traffic analyses, using

any of the following: (a) an approximately 10 mile EPZ, (b) any EPZ other than a 20 mile EPZ, (c) a 20 mile EPZ (other than the documents referred to in Requests for Admission 1 and 2)?

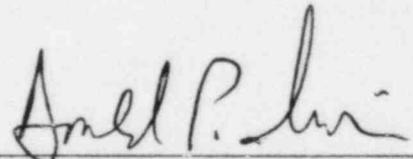
4. If the response to any of Interrogatory 3(a), (b) or (c) is anything other than a single negative, please state with respect to each such answer: (a) the nature of such analysis, (b) the author, title and date of any document containing such analysis, (c) a summary of its conclusions.

REQUESTS FOR PRODUCTION

Pursuant to 10 CFR § 2.741, Suffolk County is requested to make available for inspection and copying each study or other document identified in response to Interrogatories 2 and 4. It is requested that these documents be produced within the same time frame as the answers to Interrogatories 2 and 4.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

By 
W. Taylor Reveley, III
James E. Farnham
Donald P. Irwin
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Hunton & Williams
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DATED: August 25, 1983

CERTIFICATE OF SERVICE

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

I, Donald P. Irwin, hereby certify that copies of LILCO Interrogatories and Requests for Admissions and Production of Documents Directed to Suffolk County were served this date upon the following by first-class mail, postage prepaid, or (as indicated by one asterisk) by hand.

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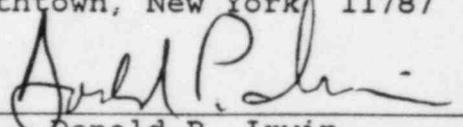
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DATED: August 25, 1983