

LILCO, February 23, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

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

LILCO'S RESPONSE TO SUFFOLK COUNTY
MOTION TO FILE NEW CONTENTIONS CONCERNING THE
LILCO OFFSITE EMERGENCY PREPAREDNESS TRAINING PROGRAM
AND LILCO'S OBJECTIONS TO PROPOSED TRAINING CONTENTIONS

Pursuant to 10 C.F.R. §§ 2.714(c) and 2.730(c) of the Commission's Rules of Practice, LILCO responds to "Suffolk County Motion for Leave to File New Contentions Concerning the LILCO Offsite Emergency Preparedness Training Program." Section I below contains LILCO's response to the assertion by Suffolk County that the proposed new contentions satisfy the standards of 10 C.F.R. § 2.714 for the admission of late-filed contentions. Section II contains LILCO's objections to each contention or part of a contention.

I. The County Fails To Meet The Standards
Of 10 C.F.R. Section 2.714

Under 10 C.F.R. § 2.714(a), the Board is required to balance the following factors to determine whether a new contention should be admitted:

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1. good cause, if any, for failure to file on time;
2. the availability of other means whereby the petitioner's interest will be protected;
3. the extent to which the petitioner's participation may reasonably be expected to assist in developing a sound record;
4. the extent to which the petitioner's interest will be represented by existing parties; and
5. the extent to which the petitioner's participation will broaden the issues or delay the proceeding.

10 C.F.R. § 2.714(a)(1).

A. No Good Cause Shown for Late-Filing

The County asserts that there is good cause for late-filed training contentions because the County "followed the Board's advice in waiting until LILCO's training materials were completed before filing new contentions"^{1/} and because the County's proposed

^{1/} The County overstates the Board's Order of September 30 when it characterizes the statement "we believe the Intervenor's are entitled to prompt notice from LILCO upon completion of the training materials" (Order at 7) as "advice" from the Board to wait until LILCO gave notice of the completion of its training materials before filing contentions on the LERO training program. It is LILCO's position that, to the extent that the County's proposed contentions allege that LILCO's training materials are missing topics or information, the County had some basis for awaiting the completion of the training materials in order to assure itself that the gap had not been filled. In contrast, to the extent that the County's proposed training contentions raise objections to the form or structure of the LILCO training program, they did not require completion of the training materials and are untimely. LILCO's objection to specific contentions will detail this distinction.

training contentions meet the three-part test for showing good cause enunciated in Duke Power Company (Catawba Nuclear Station, Units 1 and 2), CLI-83-19, 17 NRC 1041 (1983). Contrary to this assertion, the County's proposed contentions do not meet the three-part test of Catawba for "good cause."

A review of the procedural history surrounding LILCO's provision of the LERO training materials to Suffolk County is necessary to provide a factual context for the Catawba test. On October 11, 1983, LILCO filed with the Board "LILCO's Schedule for Completion of Training Materials" in which LILCO outlined the training materials that already had been provided to Suffolk County. In the Schedule, LILCO stated that almost all the training materials were already in Suffolk County's hands:

LILCO has provided Suffolk County with all 16 of the training workbook modules and all 14 of the videotapes that have been prepared for LILCO-employed LERO workers. These materials were provided piece by piece as LILCO produced them, beginning on July 18, 1983, with videotape Modules 1 and 2; the last five videotapes that have been completed (Modules 7, 12, 13, 14, and 16) were sent to Suffolk County by cover letter of September 15, 1983, and the last workbook modules (except Module 11 discussed below) were supplied by letter of September 8. LILCO has also provided Suffolk County with lesson plans used by the classroom instructors, as well as scripts for the videotapes used to train LILCO-employed LERO personnel.

Schedule at 1-2. LILCO further noted in the Schedule filed with

the Board that only a few training materials still remained to be produced by LILCO and provided to Suffolk County.^{2/} Thus, as LILCO stated in its Notice of Completion of Training Materials, the vast majority of the training videotapes and workbook sections were provided to Suffolk County by the fall of 1983. Subsequent to filing the schedule for completion of training materials on October 11, LILCO provided Suffolk County with the following training materials on the following dates:

- October 28, 1983 - LERO training videotape for Module 8A, "Portable Radio Operations"
- November 15, 1983 - Lesson plan for training of traffic guides. Drill scenarios entitled "Accident Management Drill" "EOC/ENC Activation Drill" "Radiological Monitoring and Decontamination Drill" "Traffic Guidance Drill"
- November 16, 1983 - Drill scenarios entitled "Transportation Coordination Drill" "EOC/ENC Port Jefferson Staging Area Drill" "Traffic Guidance Drill"
- December 9, 1983 - LERO training videotape Module 11 "Contaminated and Injured Individuals"

^{2/} LILCO's Schedule for Completion for Training Materials stated that the only materials that remained to be produced after October 11 were the workbook and videotape for Module 11 on Contaminated/Injured Personnel, an additional videotape on portable radios, and the lesson plan for traffic guides. Schedule at 2.

- January 12, 1984 - Lesson plan and workbook section
Module 11 "Contaminated/Injured
Individuals"
- February 2, 1984 - Drill scenarios entitled "Monitoring &
Decontamination Drill"
"Integrated SNPS/LERO Drill
EOF/EOC Activation" "EOC/ENC/All
Staging Areas/EWDF Drill"
Decontamination Tabletop"
"Dosimetry Tabletop" "Transportation
Coordination Tabletop"
Traffic Guidance Tabletop" "Dose
Assessment/Protective Action
Tabletop" "Customer Service
Notification Tabletop" "Family
Tracking Tabletop" "Communications
Tabletop" "SNPS/LERO Joint Dose
Assessment Tabletop" "SNPS/LERO
Joint Communications Tabletop"

Thus, the County had available the videotapes, workbook sections, and lesson plans -- the documents which make up the LERO classroom training program -- as much as four months prior to the filing of its training contentions and of the content of representative drill scenarios as much as three months prior to filing its training contentions.

1. The contentions are not dependent on the
content of the training materials

As the County notes, the first element of the Catawba test is whether the late-filed contentions are "wholly dependent upon the content of a particular document." The County's proposed contentions fail this test.

In many cases the County has not demonstrated at all that the proposed contentions are based on the contents of the videotapes, workbooks, lesson plans, or drill scenarios. For example, Contention 1 alleges, in essence, that the LILCO Transition Plan fails to demonstrate that training and periodic retraining will be provided to personnel from outside organizations such as schools, hospitals, the American Red Cross, and DOE-RAP. The document the content of which is at issue in Contention 1 is the LILCO Transition Plan, not the videotapes, workbooks, lesson plans, and drill scenarios that make up the training program. Similarly, the following allegations in Contention 2 are not dependent either in whole or in part on the contents of the documents which make up the LERO training program: that the instructors for the LERO training program are inadequate, that LILCO has failed to monitor the performance of the instructors, that LERO trainees cannot "flunk out," and that videotapes are ineffective educational tools.

For the foregoing reasons, the County's contentions on the training materials fail to meet the first part of the Catawba test and are untimely.

2. The contentions could have been advanced prior to the completion of the training materials

The County likewise fails to meet the second part of the Catawba test, which requires that intervenors offering a

late-filed contention show that the contention could not have been advanced with any degree of specificity in advance of the availability of the document. First, many of the County's contentions do not rely on the documents that make up the LERO training program and, therefore, could have been advanced with specificity before all of the LERO training materials were provided to the County. Second, the County has long had available information about the LERO training program in the form of the actual training materials as well as other sources. Specifically, the County was provided with information about the LERO training program through discovery, including the October 4, 1983, deposition of one of LILCO's witnesses on training. The actual classroom training materials were provided to the County, piece by piece as LILCO produced them, beginning on July 18, 1983. The majority of the classroom training materials were in the County's hands on September 15, 1983; the only exceptions were two videotapes, two lesson plans and one work-book. Since November 16, the County has had in hand representative drill scenarios that exemplify the drills used in the LERO training program. Third, as stated above, since at least October 11 when LILCO filed its "Schedule" with the Board, the County has been on notice of the fact that they had in hand virtually all of the classroom training materials used in the LERO training program. Thus, to the extent that the County's

contentions are based on the training materials, the County had available to it the very training materials upon which it now bases its contentions and long ago could have advance specific contentions on the training materials.

3. The contentions were not tendered promptly after the training materials became available

Finally, the County's training contentions fail to meet the third element of the Catawba test which requires that the contentions must be "tendered with the requisite degree of promptness once the document comes into existence and is accessible for public examination." The County places substantial reliance on LILCO's February 3 Notice as satisfying the third element of the Catawba test for prompt action. In so doing, the County misapprehends the Catawba test which requires that the contentions be tendered promptly once the document is available. Clearly, the documents upon which Suffolk County asserts that it bases its contentions, particularly those contentions related to LILCO's classroom training materials, are the training materials and not the notice of them. The training materials have long been in Suffolk County's possession.

In summary, many of the allegations in the County's proposed contentions are not based on the documents that make up the LERO training materials and, therefore, are untimely because they did not require the availability of the training materials to be

raised with specificity. In addition, the vast majority of the training videotapes, workbook sections, and lesson plans, as well as a number of representative drill scenarios, the very documents on which the County assert it relied in drafting its contentions, have been available for at least three months. The fact of the matter is that the County is out of time and has not shown good cause for late-filing of the proposed contentions.

B. Other Means Are Available To Protect
The County's Interest

The County alleges that the only means available to protect the County's interests is litigation of the proposed contentions in this proceeding. This is incorrect on two grounds. First, the Board has already admitted contentions on LILCO's Offsite Emergency Preparedness Training Program and, as the County notes "certain of those contentions relate in some respects to several of the issues raised in the County's new contentions." Second, the County ignores the fact that other means are available to ensure that the LERO training program is effective. Specifically, FEMA's annual graded exercise will test whether the LERO training program adequately prepares emergency workers to perform their jobs.

C. No Demonstration That The County's Participation
Will Aid The Development Of The Record

The County argues that this factor is "plainly satisfied

given the past history of the County's involvement in this proceeding" and alleges that, unless the County's proposed contentions are admitted, the record will be silent with respect to crucial issues. In essence, the County asserts that it has demonstrated in this proceeding that it will assist in developing a sound record and that it will do so in this instance. However, the County wholly fails to provide any details on how it might aid in the development of the record. Though evidence need not be presented at this stage, some showing concerning how a party will contribute to the development of the sound record on a particular issues in question is necessary. See Cincinnati Gas & Electric Co. (William H. Zimmer Nuclear Station), LBP-80-24, 12 NRC 231 (1980); Detroit Edison Co. (Greenwood Energy Center, Units 2 and 3), ALAB-476, 7 NRC 759, 764 (1978).

D. The County's Interest Is Being Protected By
A Party In The Proceeding

LILCO agrees with Suffolk County (at page 11 of the County motion) that no other parties are likely to represent the County's^{3/} interest in litigating the particular training concerns

^{3/} The County motion says "Intervenors'" interests, yet it continually refers to the proposed contentions as the "County's contentions". Although not entirely clear, it appears that the new proposed contentions may be sponsored by parties other than Suffolk County. Whether New York State is a co-sponsor is not clear.

raised in the newly proposed contentions. This factor is rendered unimportant, however, by the "other means" test discussed above. The fact is that both the intervenors' other contentions and the FEMA graded exercise provide substantial means of reviewing the training program.

E. Admission Of The County's Contentions
Will Delay The Proceeding

Contrary to the County's assertion, the litigation of the proposed contentions would cause delay in the proceedings. Testimony on all Group II issues is due in little over a week. If these contentions are admitted, they would raise some new issues which might require LILCO to seek discovery of the bases of the County's contentions, and the contentions could be subject to summary disposition motions. At a minimum, admission of the proposed contentions would require a new schedule for the filing of additional testimony on these contentions and would delay the completion of the proceedings.

The County's argument (on page 11 of its motion) seems to be that it has raised so many other issues that the delay caused by the new contentions would be small compared to the size of the rest of the proceeding. Likewise, a horse is small compared to an elephant, but it is still a burden if you have to carry it on your back.

II. LILCO's Objections to Particular Contentions

LILCO objects to each contention (or part of contention) listed below on one or more of the following grounds:

1. The County has not demonstrated that there is a basis for believing that the revised contention may be true;
2. The revised contention lacks specificity;
3. There is no legal requirement for the actions that the County alleges must be taken by LILCO; and
4. The revised contention is untimely.

Contention 1:

Objection. First, LILCO objects to Contention 1 as untimely. The issues raised by Contention 1 are not based on the documents that make up the LERO training materials, but are based on provisions of the LILCO Transition Plan itself. The County could have and should have raised the issues contained in Contention 1 in connection with its January 12 revision of the contentions to comport with Revision 3. Contention 1, therefore, is untimely and does not meet the test of 10 C.F.R. § 2.714.

Second, LILCO objects to Contention 1 on the ground that there is no legal requirement that LILCO train schools, hospitals, nursing homes, adult homes and other special facilities because they will not "be called upon to assist in an emergency." 10

C.F.R. §50.47(15). Essentially, schools, hospitals and other special facilities are part of the general population who will be protected by the local emergency response organization; they are not members of the emergency response organization itself.

In addition, LILCO objects to the part of Contention 1 in which it is alleged that the LILCO Transition Plan fails to demonstrate that training will be provided to support organizations such as the U.S. Coast Guard and ambulance companies. Such an allegation is without basis. The Plan at 5.1-6 specifically states that training will be provided to those organizations.

Contention 2:

Objection. LILCO objects to Contention 2 and its subparts on the ground that they are untimely. Contention 2 and its subparts are concerned solely with the LERO classroom training materials and the format of the LERO classroom training program. The parts of Contention 2 that relate to the format of the LERO classroom training program are untimely because the County has long had the means available to raise those contentions with specificity and did not need to wait for completion of the training materials to draft these subparts of Contention 2.

Moreover, even to the extent that subparts of Contention 2 address the content of the LERO training materials, the content is untimely because the majority of the videotapes, workbooks, and

lesson plans used in the classroom training portion of the LERO training program have been available to the County at least since October 11. In short, the County fails to meet the standards for late-filed contentions of 10 C.F.R. § 2.714. In addition, LILCO objects to the specific subparts of Contention 2 as follows:

Contention 2.A:

Objection. LILCO objects to Contention 2.A on the ground that it lacks specificity. The contention does not particularize what is "inadequate and incomplete" about the lesson plans nor does it detail in any way what would constitute "sufficient guidance," "substantive information" or "resource references."

Contention 2.B:

Objection. LILCO objects to Contention 2.B on the ground that it lacks specificity. The contention does not specify what intervenors consider inadequate about the workbooks and videotape scripts used in the LILCO classroom training program, nor do intervenors specify what they would consider "sufficient" information concerning "important substantive matters." The contention simply says that the materials are "inadequate" and not "sufficient" without even attempting to specify any inadequacies or insufficiencies.

Contention 2.C:

Objection. The focus of Contention 2.C is whether the instructors for the LERO training program are adequate. Such an issue is not based on the content of the training materials, is untimely, and does not meet the Section 2.714 standard for late-filed contentions. The County has been aware of the qualifications of the LERO training instructors since September 16, 1983, when LILCO provided to the County in discovery a copy of the training program proposal submitted by Impell Corporation (then EDS Nuclear). That proposal included resumes of persons who would be instructors. In addition, the County has proffered no basis for the allegations in Contention 2.C that the instructors in the LERO training program are neither experienced nor knowledgeable about the subject area they are to teach or that the instructors are neither experienced nor trained in teaching methods.

Contention 2.D:

Objection. LILCO objects to Contention 2.D in which the County states "LILCO has failed to monitor properly or effectively the classroom performance or effectiveness of the LILCO training instructors" as lacking basis. LILCO also objects to Contention 2.D as untimely. Whether or not LILCO has properly or effectively monitored the classroom performance or effectiveness of the LERO training instructors is not an issue that relies on the content and availability of a complete set of the LERO training materials.

Contention 2.E:

Objection. LILCO objects to Contention 2.E on three grounds. First, the assertion that there is no meaningful testing to determine if information presented in classroom training sessions was absorbed is without basis. The LERO training program includes workbook sections that require the trainee to recall the information presented in the classroom session, and the drill and exercise program requires that the trainee put into practice the information imparted in the classroom. Second, there is no legal requirement that a training program for offsite emergency response personnel include provisions for graded testing, and the County cites no such requirement.

Contention 2.F:

Objection. LILCO objects to Contention 2.F on the ground that it is untimely. The allegations in the contention that there is no evaluation of a trainee's performance and that it is impossible to "flunk out" of the LERO training program are not based on the content of the LERO classroom training materials and, therefore, did not require completion of the training materials before Contention 2.F could be raised with specificity. Moreover, the allegations of Contention 2.F are without basis. The County has offered no reason for the allegation that trainees are not evaluated.

Contention 2.G:

Objection. The County's assertion that the LERO training program consists primarily of descriptive statements of job title, chain of command, and job duties rather than information concerning how trainees are to perform their jobs is without basis.

Contention 2.H:

Objection. Contention 2.H states "[m]any trainees have never reviewed the LILCO Plan or the implementing procedures." First, the County has proffered no basis upon which it makes such an allegation. Those implementing procedures that a LERO worker needs to perform his job are included in the content of the classroom training sessions that the worker attends and are available to him in a notebook at his duty station during drills and exercises. Additionally, the County cites no specifics whatsoever of failure to train the LERO workers in the necessary procedures.

Second, there is no legal requirement that the trainees have reviewed the LILCO Plan or the implementing procedures. It is not important that a trainee be able to cite the LILCO Plan or implementing procedures chapter and verse but, rather, that he be able to perform the emergency responsibility assigned to him.

Contention 2.I

Objection. Contention 2.I lacks specificity. The use of phrases such as "trainees receive much general and in many cases irrelevant information rather than sufficiently detailed information" does not particularize the County's objections in a manner that permits LILCO to know what it is the County seeks to litigate.

Contention 2.J:

Objection. LILCO objects to Contention 2.J as without basis. As noted in the LILCO Transition Plan at 5.1-5-5.1-6, many of the classroom training modules include practical hands-on demonstrations such as equipment demonstrations.

Contention 2.K:

Objection. LILCO objects to Contention 2.K on two grounds. First, Contention 2.K is untimely. Since LILCO's discovery responses of June 20, 1983, the County has known that LILCO intended to use videotapes as instructional tools. Contention 2.K states, in essence, that the videotapes used by LILCO are ineffective educational tools; this issue could have been raised long before the completion of the training materials. Also, the County has had virtually all of the videotapes used in the LERO training program for over four months, yet during that time raised no question as

to the effectiveness of the videotapes as an educational tool. Second, the contention is without basis. The County has offered no reason for its statement that the videotapes "fail to promote attentiveness, understanding, participating, or retention of information by trainees," nor for the statement that the videotapes are nothing more than taped lectures. Finally, the County's contention is not specific, because it does not indicate how or why the videotapes fail to promote attentiveness, understanding, participation or retention of information.

Contention 2.L:

Objection. LILCO objects to Contention 2.L as lacking basis and specificity. The County has offered no rationale for its statement that the review exercises are "not used in a manner designed to promote or verify meaningful learning" and that "the exercises do not correspond to the learning objectives" of the lesson. Nor is it clear what these vague phrases mean.

Contention 3:

Objection. LILCO objects to Contention 3 and its subparts as untimely. The focus of Contention 3 and its subparts is the form and content of the drill and exercise portion of LILCO's training program. Representative drill scenarios on which the County could have drafted this contention have been in the County's possession

since November 16, 1983. This is particularly so given the low level of specificity in Contention 3 and its subparts. The County's Contention 3 and subparts, therefore, fail to meet the standards for the late-filed contentions of 10 C.F.R. §2.714. In addition, LILCO objects to the specific subparts of Contention 3 as follows:

Contention 3.A:

Objection. The County alleges that the drills are "too short" and "too narrow" to prepare trainees for their emergency roles. LILCO objects to this subpart on the grounds that it lacks basis and specificity. The contention, as drafted, fails to sufficiently particularize why LILCO's drills are inadequate and, in fact, may misapprehend the purpose of drills. As stated in NUREG-0654 II.N.2 "a drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. . . . Each organization shall conduct drills, in addition to the annual exercise." Thus, it is in the annual exercise required by the Federal Emergency Management Agency, which is not at issue in this litigation, that "the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations" is tested. NUREG-0654 II.N.1.a.

Contention 3.B:

No objection.

Contention 3.C:

Objection. First, there is no legal requirement for stress training. The regulations and guidelines refer only to radiological emergency response training. See 10 C.F.R. § 50.47(b)(14) and (15), 10 C.F.R., Part 50, Appendix E.IV.F, and NUREG-0654, Section II.N and II.O. Second, the County's proposed contention is untimely. The County has known since the deposition of Ronald A. Varley on October 4, 1983, that LERO drill scenarios would not specifically simulate stress. See Attachment 1, Varley Deposition at Tr. 142-43.

Contention 3.D:

No objection.

Contention 3.E:

Objection. LILCO objects to this contention on the ground that there is no legal requirement that LERO workers interact with school officials, special facility administrators and the public during the drill program. First, 10 C.F.R. § 50.47 requires only that "radiological emergency response training is provided to those who may be called on to assist in an emergency." School administrators and special facility administrators do not have

emergency response responsibilities that would require them to assist in an emergency (except in the sense that, for example, members of the public who have children or elderly dependents have to assist them to evacuate.)^{4/} Essentially, even though they are guardians of a special population, they are part of a general population who will be protected by the emergency response organization and are not part of the emergency response organization itself.

Second, contrary to the statement in proposed Contention 3.E, drill and exercise programs should not include participation by the public. As stated in 10 C.F.R. Part 50, Appendix E, IV.F.1, exercises shall be conducted which tests "as much of the licensee State, and local emergency plans as is reasonably achievable without mandatory public participation . . ."

Contention 3.F:

Objection. LILCO objects to Contention 3.F on the grounds that the contention lacks specificity. Intervenors' contentions

^{4/} This does not mean that those administrators are ignored in planning; it does mean there is no NRC requirement that they be trained by the offsite emergency organization. In fact, as stated in the LILCO Transition Plan at 5.1-6, training will be offered to school officials and special facility administrators. Obviously, there may be school or hospital administrators, under emergency plans anywhere in the country, who do not feel they need further training.

must be sufficiently precise to enable one to ask what type of evidence would have be presented to either support or refute the contention. The use of abstract words in Contention 3.F such as "the drills provide inadequate opportunities for LERO personnel to develop skills" and "in drills LERO personnel have not been provided adequate opportunities to learn to deal with unexpected difficulties or to develop and exercise good jugment" does not provide a basis for determining what the County believes would be adequate. In addition, LILCO objects to the contention on the ground that it fails to specify what skills the LERO training program fails to teach.

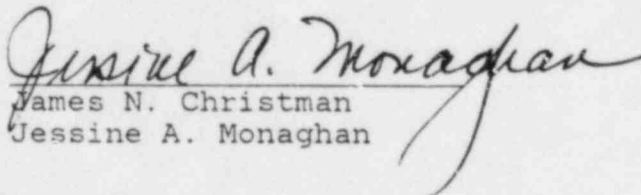
Contention 3.G:

Objection. In Contention 3.G the County alleges that the LILCO drills contain no "terminal performance standards" and that there are no objective criteria to be used in evaluating the performance of trainees. This contention should be denied as lacking basis. As is true for emergency response organizations at other nuclear power plants, the terminal performance standard and observable objective criteria are whether the trainees perform their tasks correctly in a FEMA-graded exercise.

Conclusion

For the foregoing reasons, "Suffolk County Motion for Leave to File New Contentions Concerning the LILCO Offsite Emergency Preparedness Training Program" should be denied. In the alternative, LILCO respectfully requests that, to the extent Suffolk County's proposed contentions are admitted, their numbering scheme and sequence be conformed^{5/} to the Proposed Emergency Planning Contentions Modified to Reflect Revision 3 of the LILCO Transition Plan, filed by Suffolk County on January 12, 1984, and admitted, in part, by this Board in its Memorandum and Order of February 3, 1984. There are already Contentions 1, 2, and 3 admitted in this proceeding, and an additional set of Contentions 1, 2, and 3 would be confusing.

Respectfully submitted,


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DATED: February 23, 1984

^{5/} For example, the new contentions could be numbered 98, 99, etc., or if the Board prefers to keep them near the other training contentions 35, 36, 37, 38, 42, 43, or 44.A-C, since the contentions originally bearing those numbers were denied admission.

9

1 behaviors --

2 Q Just to repeat the questions, will the
3 scenarios, then, contain terminal performance behaviors?

4 A From this terminal, I assume that terminal
5 performance behavior is some type of final pass or
6 fail evaluation for an individual. To the best of my
7 knowledge, our drill scenarios will not have that type
8 of document within them.

9 Q In the scenarios, for the drills, Mr.
10 Varley, how will -- how is stress being created for the
11 individual workers?

12 A Can you elaborate further on that?

13 Q Well, is anything else done in the
14 scenarios to simulate working under stressful conditions?

15 A I am not an expert in the field of stress.
16 I could not really characterize whether an individual's
17 performance in a drill situation is stressful or not.

18 Q Are you informed in writing of the drill
19 scenarios?

20 A Yes.

21 Q Are you supervising that as you supervised
22 the writing of the workbooks and modules?

23

24

25

1 A Yes.

2 Q But you are not aware of whether or not
3 stress is going to be simulated?

4 Or whether stress will be imposed on the
5 behavior of the LERO workers in the drills?

6 A I don't know of any particular method
7 that one would use to develop stress in an individual
8 in a drill situation.

9 Q Mr. Varley, I direct your attention to
10 Pages 8 and 9 of the Local Emergency Response Organiza-
11 tion Training Program.

12 A All right.

13 Q Now, under traffic control, and under "Bus
14 Drivers," on page 9 there, it is indicated that Impell
15 can provide individuals who can teach skills related
16 to dealing with stress and confrontational situations,
17 traffic guides and drivers?

18 A I see that, yes.

19 Q Is that being done?

20 A No.

21 Q Are you also supervising Impell's efforts
22 to write scenarios for an exercise, more than one
23
24
25

LILCO, February 23, 1984

CERTIFICATE OF SERVICE

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

I, Jessine A. Monaghan, certify that copies of LILCO'S RESPONSE TO SUFFOLK COUNTY MOTION TO FILE NEW CONTENTIONS CONCERNING THE LILCO OFFSITE EMERGENCY PREPAREDNESS TRAINING PROGRAM AND LILCO'S OBJECTIONS TO PROPOSED TRAINING CONTENTIONS were served this date upon the following by first-class mail, postage prepaid, or by hand (as indicated by one asterisk), or by Federal Express (as indicated by two asterisks).

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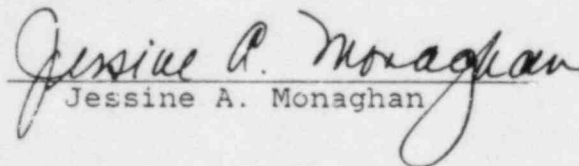
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