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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

ATOMIC SAFETY AND LICENSING BOARD
Before Administrative Judges
James A. Laurenson, Chairman
Dr. Jerry R. Kline
Mr. Frederick J. Shon

DOCKETED
USNRC

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In the Matter of)
LONG ISLAND LIGHTING COMPANY)
(Shoreham Nuclear Power)
Station, Unit 1))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket No. 50-322-0L-3
(Emergency Planning Proceeding)

June 4, 1984

UPDATE OF NEW YORK STATE'S TESTIMONY CONCERNING
CONTENTION 24.F.2

Pages 2 and 3 of the "DIRECT TESTIMONY OF CHARLES V. FAILLA ON BEHALF OF NEW YORK STATE REGARDING CONTENTION 24.F.2" have been updated. Attached hereto are the revised pages 2 and 3.

Respectfully submitted,

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Albany, New York
June 4, 1984

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radiological accident at Shoreham. However, it is my understanding that LILCO's bus company agreements provide that each bus company's obligation to provide buses to LILCO is subject to its obligations to provide buses to the schools and school districts with which it has contracts.

The State has been able to obtain information with respect to the buses committed to schools and school districts by 7 of the 12 bus companies with which LILCO has agreements. In the following table, the number of buses committed by each of those companies to schools and school districts is compared with the total number of buses that company has in service.¹

<u>Company</u>	<u>Committed to Schools</u>	<u>Committed to LILCO</u>	<u>Total In Service*</u>	<u>Available for LILCO's Use</u>
Educational Bus Transportation, Inc.	98	100	86 <i>72</i>	0
Hermon E. Swezey Co., Inc.	1	29	31 <i>28</i>	30 <i>27</i>
Huntington Coach, Inc.	107	100	69 <i>68</i>	0
Seaman Bus Co., Inc.	31	35	35	4
Starlite Bus Co., Inc.	44	60	63 <i>62</i>	19 <i>18</i>
Suburbia Bus Corp.	169	190	180 <i>188</i>	11 <i>19</i>
United Bus Corp.	<u>200</u>	<u>200</u>	<u>205</u> <i>206</i>	<u>5</u> <i>6</i>
TOTALS	650	714	669 <i>679</i>	69 <i>74</i>

*40-adult passenger school buses as of 3/19/84

5/30/84

¹The source of information concerning the number of buses committed to schools and school districts by each of the seven bus companies included in the table is LILCO's response to Suffolk County Interrogatory No. 3 of August 19, 1983. LILCO's response only provides such information for the seven bus companies mentioned above. The total number of buses each of those companies has in service is derived from the bus inspection records of the New York State Department of Transportation, as of early March 1984. Educational Bus Transportation and Huntington Coach are able to satisfy their service demand by staggering the number of buses used at one time during peak service. As a result of this, the total buses in service less the total buses committed to schools by the 7 bus companies will not equal the total buses available for LILCO's use (i.e. 669-650/69).

679-650 = 74

LILCO claims that the seven aforementioned companies together have committed 714 buses to LILCO's use in the event of an accident at Shoreham. (See Testimony of Cordaro et al. on Behalf of Long Island Lighting Company on Phase II Emergency Planning Contention 24.F, G , I, K, L, O, P, R, S and T, at 6, 7.) However, as seen in the above table, if an accident were to occur during school sessions, the seven aforementioned companies could in fact provide LILCO with a total of only 69 buses, or about 10% of the number of buses nominally committed to LILCO.

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CERTIFICATE OF SERVICE

I hereby certify that one copy of the "UPDATE OF NEW YORK STATE'S TESTIMONY CONCERNING CONTENTION 24.F.2" has been served to each of the following this 4th day of June 1984 by U. S. Mail, first class, except as otherwise noted:

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*By Hand - In addition to service by mail, revisions
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***By Telecopier

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