

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-4
(Low Power)

NRC STAFF RESPONSE TO STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NOT GENUINE
ISSUE TO BE HEARD ON PHASE II LOW POWER TESTING

As detailed in the attached NRC Staff Response to LILCO's Motions for Summary Disposition of Phases I and II, the Staff adopts the following position on the Statement of Material Facts appended to LILCO's Motion for Summary Disposition of Phase II:

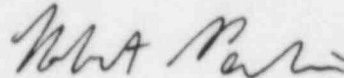
- 1-4 The Staff neither opposes nor supports Statements 1-4.
- 5 The Staff supports Statement 5.
- 6-7 The Staff does not support Statements 6 or 7 as presently worded, and believes the following is more correct (see Hodges Affidavit, ¶ 10):
 - 6. Of the 23 possible Chapter 15 events reviewed, 20 would not be adversely affected by the loss or unavailability of offsite AC power. Therefore, the consequences of these events are unaffected by the unavailability of the TDI diesels.

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7. The three events that are adversely affected by the loss or unavailability of offsite AC power are: pipe breaks inside the primary containment, feedwater system pipe break, and the loss of AC power event.

8-13 The Staff supports Statements 8-13. The Staff further submits that Statements 5, 8-13, and 6 and 7 as worded above be deemed admitted for purposes of this proceeding unless properly controverted by the County or State.

Respectfully Submitted,



Robert G. Perlis
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 13th day of June, 1984