

LILCO, June 20, 1984

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-3
) (Emergency Planning
(Shoreham Nuclear Power Station,) Proceeding)
Unit 1))

LILCO'S SUPPLEMENTAL TESTIMONY ON CONTENTION 24.R
(LETTER OF AGREEMENT WITH CONNECTICUT)

1. Q. Please identify yourselves.

My name is Matthew C. Cordaro. My address is Long Island Lighting Company, 175 East Old Country Road, Hicksville, New York, 11801.

My name is William F. Renz. My address is Long Island Lighting Company, 175 East Old Country Road, Hicksville, New York, 11801.

[Both witnesses] Our professional qualifications have previously been admitted into the record. Each of us sponsors the remaining testimony below.

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2. Q. What is Contention 24.R?

A. Contention 24.R states, in essence, that the State of Connecticut has not agreed to implement protective actions for that portion of the Shoreham 50-mile ingestion exposure pathway EPZ that is within Connecticut. LILCO's previously filed testimony on Contention 24.R sets out the complete text of the contention (Tr. Apr. 6, 1984, Vol. II, p. 27).

3. Q. Since LILCO witnesses filed testimony on Contention 24.R on March 2, 1984 and were cross-examined on that testimony on April 6 and 24, have you received additional information that bears upon the issues raised in Contention 24.R?

A. Yes. LILCO witnesses have testified, based upon a December 15, 1983 letter from the State of Connecticut to the State of New York (Tr. Apr. 6, 1984, Vol. II, Attachment 28), that the State of Connecticut has agreed to assume responsibility for implementing protective actions for the ingestion exposure pathway in the event of a radiological emergency at Shoreham (see Tr. Apr. 6, 1984, Vol. II, pp. 27-28). As a result of the letter introduced by the State of New York on cross-examination of LILCO's witnesses on Contention 24.R (N.Y. Ex. 3, ff. Tr. 6598), we contacted the

State of Connecticut to confirm our understanding of the meaning of the December 15, 1983 letter (see Attachment 1 to this testimony). The State of Connecticut responded on June 14, 1984, with a letter to LILCO that states (1) Connecticut officials will protect citizens of Connecticut should there be an accident at Shoreham, (2) they will do so by instituting existing State emergency plans, (3) they will do so whether they are notified by LILCO "or any other competent source," and (4) they will do so regardless of a response, or lack of it, from New York State or LILCO. That letter is Attachment 2 to this testimony. It was received by LILCO on June 18, 1984.

Taken together, the December 15 and June 14 letters from Connecticut indicate beyond any doubt that, contrary to the allegations of Contention 24.R, the State of Connecticut has agreed to implement protective actions for that portion of the 50-mile ingestion exposure pathway EPZ within its boundaries.

4. Q. Does that conclude your supplemental testimony?

A. Yes.



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

(516) 733-4945

ATTACHMENT 1 TO
LILCO'S SUPPLEMENTAL
TESTIMONY ON
CONTENTION 24.R

May 22, 1984

Mr. Frank Mancuso
Director
Connecticut Office of
Civil Preparedness
State Armory
360 Broad Street
Hartford, CT 06105

Dear Mr. Mancuso:

A few weeks ago, I had the opportunity to talk to Mr. Grandone of your office to discuss the present state of emergency planning in support of the Shoreham Nuclear Power Station. As you know, the Long Island Lighting Company is in the process of developing and implementing a Local Offsite Radiological Emergency Response plan to respond to an emergency at Shoreham. LILCO has undertaken this endeavor as a result of Suffolk County's refusal to participate in the planning for such a response. As I believe you are also aware, the State of New York has taken the position that they will not "impose" a plan on Suffolk County.

LILCO's Plan is currently being considered before the Atomic Safety and Licensing Board. During the development and institution of this Plan, LILCO has reached agreement, or understanding, with many of the external organizations that would be needed to support such a response, such as the U.S. Department of Energy, the U.S. Coast Guard, the American Red Cross, and various ambulance and bus companies.

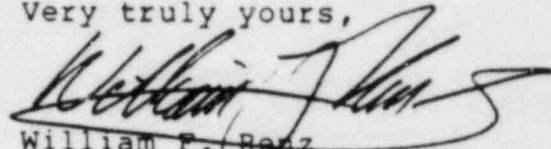
During my conversation with Mr. Grandone, he indicated that if the LILCO Plan is approved by the NRC, and LILCO receives an operating license for Shoreham, the State of Connecticut would institute its emergency plans to protect the health and safety of the residents of Connecticut were LILCO to notify Connecticut of an accident at Shoreham, even in the unlikely event that New York State and Suffolk County were not

Mr. Frank Mancuso
May 22, 1984
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participating in a response to that accident. I know that you have no wish to get involved in the political situation surrounding emergency planning for Shoreham. Although I believe your letter of December 15, 1984 states this position clearly, I would be grateful if you would send us a letter reconfirming this information.

Should you or your staff have any questions regarding this request, or have need of further information, please do not hesitate to contact me at the above listed phone number or address.

Very truly yours,



William F. Reitz
Offsite Emergency Preparedness
Coordinator

cc: Mr. Frank Grandone

bcc: Messrs. J. A. Weismantle
E. J. Youngling
C. A. Daverio
J. N. Christman
M. Horoschak
Ms. K. E. B. McCleskey
E. D. Robinson



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC SAFETY
OFFICE OF CIVIL PREPAREDNESS

ATTACHMENT 2 TO
LILCO'S SUPPLEMENTAL
TESTIMONY ON
CONTENTION 24.R

June 14, 1984

Mr. William F. Renz
Offsite Emergency Preparedness Coord.
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

Dear Mr. Renz:

Your letter of May 22, 1984 requests a reconfirmation that the State of Connecticut Office of Civil Preparedness would react to an emergency or pre-emergency at Shoreham by instituting emergency plans to protect the health and safety of the residents of Connecticut.

It is incredible that you assume we might not. Nevertheless, I will provide reassurance.

Regardless of what New York or LILCO does, Connecticut will look after its own public safety. This office will react to an accident at Shoreham or any other nearby facility by instituting existing emergency plans and resources to protect the health and safety of the residents of Connecticut. This is true whether we are notified by LILCO or any other competent source such as the Federal Emergency Management Agency.

I don't believe it is the intent of NUREG-0654/FEMA-REP-1 to make utilities primarily responsible for municipal level preparedness. This is a dangerous trend. It may lead to a situation with many utilities responsible for off-site standards of preparedness, a development that would make a sham of NUREG-0654/FEMA-REP-1.

I hope this letter satisfies your concern.

Sincerely,

Frank Mancuso
State Director

FM/1a1

cc: F. Grandone
CF

Phone: 566-3180
360 Broad Street — Hartford, Connecticut 06105

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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 certify that copies of (1) LILCO's MOTION TO ADMIT LILCO'S SUPPLEMENTAL TESTIMONY ON CONTENTION 24.R (LETTER OF AGREEMENT WITH CONNECTICUT), and (2) LILCO'S SUPPLEMENTAL TESTIMONY ON CONTENTION 24.R (LETTER OF AGREEMENT WITH CONNECTICUT) were served this date upon the following by first-class mail, postage prepaid, or (as indicated by one asterisk) by hand, or (as indicated by two asterisks) by Federal Express.

James A. Laurenson,
 Chairman*
 Atomic Safety and Licensing
 Board
 U.S. Nuclear Regulatory
 Commission
 East-West Tower, Rm. 402A
 4350 East-West Hwy.
 Bethesda, MD 20814

Secretary of the Commission
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Atomic Safety and Licensing
 Appeal Board Panel
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Dr. Jerry R. Kline*
 Atomic Safety and Licensing
 Board
 U.S. Nuclear Regulatory
 Commission
 East-West Tower, Rm. 427
 4350 East-West Hwy.
 Bethesda, MD 20814

Atomic Safety and Licensing
 Board Panel
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Mr. Frederick J. Shon*
 Atomic Safety and Licensing
 Board
 U.S. Nuclear Regulatory
 Commission
 East-West Tower, Rm. 430
 4350 East-West Hwy.
 Bethesda, MD 20814

Bernard M. Bordenick, Esq.*
 Oreste Russ Pirfo, Esq.
 Edwin J. Reis, Esq.
 U. S. Nuclear Regulatory
 Commission
 7735 Old Georgetown Road
 (to mailroom)
 Bethesda, MD 20814

Eleanor L. Frucci, Esq.*
 Attorney
 Atomic Safety and Licensing
 Board Panel
 U. S. Nuclear Regulatory
 Commission
 East-West Tower, North Tower
 4350 East-West Highway
 Bethesda, MD 20814

Stewart M. Glass, Esq.**
 Regional Counsel
 Federal Emergency Management
 Agency
 26 Federal Plaza, Room 1349
 New York, New York 10278

Stephen B. Latham, Esq.
 Twomey, Latham & Shea
 33 West Second Street
 Post Office Box 398
 Riverhead, NY 11901

Fabian G. Palomino, Esq.**
Special Counsel to the
Governor
Executive Chamber
Room 229
State Capitol
Albany, New York 12224

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

Mr. Marc W. Goldsmith
Energy Research Group
4001 Totten Pond Road
Waltham, Massachusetts 02154

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Mr. Jay Dunkleberger
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Gerald C. Crotty, Esq.**
Counsel to the Governor
Executive Chamber
State Capitol
Albany, New York 12224

Ralph Shapiro, Esq.
Cammer & Shapiro, P.C.
9 East 40th Street
New York, New York 10016

James B. Dougherty, Esq.
3045 Porter Street
Washington, D.C. 20008

Jonathan D. Feinberg, Esq.
New York State Public Service
Commission, Staff Counsel
3 Rockefeller Plaza
Albany, New York 12223

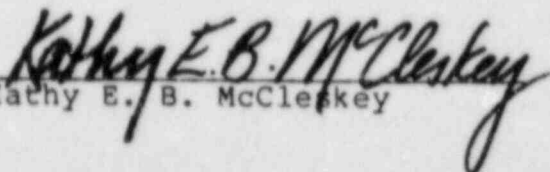
Spence W. Perry, Esq.**
Associate General Counsel
Federal Emergency Management
Agency
500 C Street, S.W., Rm. 840
Washington, D.C. 20472

Ms. Nora Bredes
Executive Coordinator
Shoreham Opponents' Coalition
195 East Main Street
Smithtown, New York 11787

Martin Bradley Ashare, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

Hunton & Williams
707 East Main Street
Post Office Box 1535
Richmond, Virginia 23212

DATED: June 20, 1984


Kathy E. B. McCleskey