

Lanpher to R. M. Rolfe and a letter dated June 14, 1984 from C. Sedky to R. M. Rolfe. LILCO was previously supplied with the resumes of Messrs. Minor, Hubbard and Bridenbaugh, and Deputy Chief Roberts and Deputy Inspector McGuire.

Request 2

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of a work plan for comparative assessment of LILCO's power system configuration for use during low power testing as proposed by LILCO with the power system configuration described in LILCO's FSAR for Shoreham.

Response

Responsive documents were identified and produced to LILCO under cover of letters dated June 7, June 11, and June 12, 1984 from L. C. Lanpher to R. M. Rolfe and a letter dated June 14, 1984 from C. Sedky to R. M. Rolfe. Copies of the above referenced letters are Attachments 1 through 4 hereto. Responsive documents from the files of Messrs. Minor, Hubbard, and Bridenbaugh are enclosed herewith. Also enclosed herewith are responsive documents from the files of Messrs. Weatherwax and El-Gasseir which were not located until after their depositions.

Request 3

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any comparative assessment of LILCO's power system configuration for use during low power testing as proposed by LILCO with the power system configuration described in LILCO's FSAR for Shoreham.

Response

See response to Request 2.

Request 4

All documents reflecting, containing, discussing, concerning, pertaining to, generated as a result of, or supporting any opinion intended to be expressed at the hearings or in any testimony to be filed in this proceeding by any of the following:

- (a) Robert K. Weatherwax;
- (b) George Dennis Eley;
- (c) Aneesh Bakshi
- (d) Dr. Christian Meyer;
- (e) Gregory C. Minor;
- (f) Professor Jose M. Roesset;
- (g) Dale Bridenbaugh;

- (h) Richard Hubbard;
- (i) Mohamed M. El-Gasseir;
- (j) Stanley Christensen;
- (k) Richard Roberts;
- (l) Phillip McGuire;
- (m) Any other consultant or other person whom the County expects to call as a witness at the hearing in this proceeding.

Response

See response to Request 2.

Request 5

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any study, investigation, analysis or report of the (i) reliability, (ii) operation, (iii) general performance, (iv) ability to operate during or after a seismic event of any magnitude, (v) quality assurance, or (vi) procedures for operating any of the following to which reference is made in LILCO's Supplemental Motion and Application for Exemption:

- (a) the GM EMD diesels;
- (b) the 20 MW gas turbine;
- (c) any or all of the gas turbine at Holtsville;

- (d) the gas turbine at Southold;
- (e) the gas turbine at East Hampton;
- (f) the gas turbine at any of LILCO's major generating stations;
- (g) LILCO's interconnections with the New York Power Pool or New England Power Exchange;
- (h) LILCO's transmission lines or related equipment or facilities serving Shoreham either directly or indirectly.

Response

See response to Request 2.

Request 6

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any opinions, analyses, investigations, reports or studies concerning operating procedures or training for operation of any of the power sources described in Request 5 above.

Response

See response to Request 2.

Request 7

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any study, analysis, opinion, report, investigation or calculation concerning LILCO's ability to restore AC power to Shoreham or the time within which LILCO can restore AC power to Shoreham using any of the power sources described in Request 5 above.

Response

See response to Request 2.

Request 8

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any opinion, study, calculation, report, analysis or investigation concerning or otherwise pertaining to the length of time within which AC power must be restored to Shoreham in the event of any of the accidents or transients included in the Chapter 15 safety analysis in Shoreham's FSAR or for any other accident or transient which the County contends or may contend is relevant in any way to the public health and safety issues to be heard incident to LILCO's Supplemental Motion or Application for Exemption.

Response

See response to Request 2.

Request 9

All notes, correspondence with any person, documents, charts, graphs, drawings, calculations, computer tapes or printouts, and other writings and recordings of any kind generated by or on behalf of any of the following persons in connection with any investigation, report, analysis, study, calculation or opinion concerning any aspect of LILCO's Supplemental Motion for Low Power License or Application for Exemption:

- (a) Robert K. Weatherwax;
- (b) George Dennis Eley;
- (c) Aneesh Bakshi;
- (d) Dr. Christian Meyer;
- (e) Gregory C. Minor;
- (f) Professor Jose M. Roesset;
- (g) Dale Bridenbaugh;
- (h) Richard Hubbard;
- (i) Mohamed M. El-Gasseir;
- (j) Stanley Christensen;
- (k) Richard Roberts;

- (l) Phillip McGuire;
- (m) any other consultant or other person whom the County expects to call as a witness at the hearing in this proceeding.

Response

See response to Request 2.

Request 10

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any review, opinion, study or analysis by any employee or consultant of the County concerning the Supplemental Evaluation Report issued (Supplement No. 5) by the NRC Staff for Shoreham.

Response

See response to Request 2.

Request 11

All documents reflecting, containing, discussing, concerning, pertaining to or generated as a result of any fault-tree analyses for Shoreham during 5% low power testing conditions as proposed by LILCO or any extended risk assessment for Shoreham.

Response

See response to Request 2.

Request 12

Copies of the following reports and analyses authored or co-authored by Robert Weatherwax:

- (a) "Comments on Assessment of Accidental Pathways, Subtask D Report (draft), A.D. Little, Inc., dated February, 1978" for Office of Radiation Programs, EPA, July 12, 1978;
- (b) "Probabilistic Fission Power Plant Risk Analysis: Its Virtues and Limitations" presented as an invited paper at the American Fiscal Society General Meeting, April, 1975, and published in Bulletin of the Atomic Scientists, September, 1975;
- (c) "Probabilistic Risk Analysis of Nuclear Systems," Princeton University Seminar, May, 1975;
- (d) "Applications of Multi-Phase Fault Tree Analysis," presented as part of Industry Course

entitled RISK ANALYSIS given at Flow Research, Inc., Kent, Washington, February 1973;

- (e) "A Comparison of Fault Tree Quantification Techniques," presented to System Safety Society Symposium, University of Southern California, April, 1972.

Response

The publications requested in Subparts (a) and (b) of Request 12 were produced under cover of the June 12, 1984 letter from L. C. Lanpher to R. M. Rolfe that is Attachment 3 hereto. The item requested in subpart (c) of Request 12 was a seminar in which Mr. Weatherwax participated. He presented no paper, and he no longer has any documents associated with that seminar. Neither the County nor Mr. Weatherwax possesses copies of the documents requested in subparts (d) and (e) of Request 12.

Request 13

All reports, studies, investigations, analyses and any other documents reflecting, concerning, containing, discussing, pertaining to the effect of the SSE, were it to occur at or near Shoreham, on the supply of AC power to Shoreham.

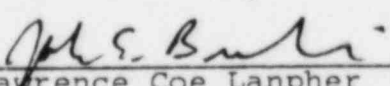
Response

See response to Request 2.

Respectfully submitted,

Martin Bradley Ashare
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11788

KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS



Lawrence Coe Lanpher
Karla J. Letsche
John E. Birkenheier
1900 M Street, N.W.
Washington, D.C. 20036

Attorneys for Suffolk County

June 22, 1984

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.
WASHINGTON, D. C. 200361488 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 374-8112TELEPHONE (202) 462-7000
TELEX 440209 RHPH UI1600 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 385-6800

June 7, 1984

WRITER'S DIRECT DIAL NUMBER

202/452-7011

(BY HAND)

Robert M. Rolfe, Esq.
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Dear Bob:

Enclosed you will find the documents from Messrs. Eley and Bakshi which are responsive to LILCO's document production requests. The documents consist primarily of documents produced by LILCO in discovery, with handwritten notes or yellow highlighting supplied by Mr. Eley or Mr. Bakshi. The yellow highlighting did not xerox and was added by our office so there would be faithful reproduction of the documents. Further, in many cases handwritten notes did not copy legibly; they were added by hand by my office.

The following documents are not being produced either because they already are in LILCO's possession, or because they are subject to the work product privilege (denoted with asterisk).

From G. Dennis Eley's Files:

1. Nondisclosure Agreement of 5/24/84;
2. Commission Order (CLI-84-8), 5/16/84;
3. Affidavit of George Dennis Eley, 4/24/84;
- 4.* Letter from John E. Birkenheier, 3/31/84, re discovery matters;

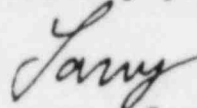
Robert M. Rolfe, Esq.
June 7, 1984
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5. Letter from Anthony F. Earley, Jr., Esq. to Lawrence Coe Lanpher, Esq., 5/31/84;
6. Letter from Robert M. Rolfe, Esq. to Lawrence Coe Lanpher, Esq., 5/23/84, 2 copies; and
7. Order Establishing Schedule for Resumed Hearing, 5/31/84;

From Aneesh Bakshi's Files:

1. Nondisclosure Agreement of 5/24/84;
- 2.* Letter from John E. Birkenheier, with attachments, 3/31/84;
3. Commission Order (CLI-84-8), 5/16/84;
- 4.* Letter from Lawrence Coe Lanpher, Esq., 6/1/84, with attachments prepared by counsel;
5. Letter from Karla J. Letsche, Esq. to Robert M. Rolfe, Esq., 5/30/84, with attachment of discovery requests.

Sincerely yours,



Lawrence Coe Lanpher

LCL/dk
Enclosures

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.
WASHINGTON, D. C. 20036

1428 BRICKELL AVENUE
MIAMI, FLORIDA 33132
(305) 374-8112

TELEPHONE (202) 452-7000
TELEX 440809 HLLH UT

1500 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 355-6500

WRITER'S DIRECT DIAL NUMBER
(202) 452-7011

June 11, 1984

BY HAND

Robert M. Rolfe, Esq.
Hunton & Williams
707 East Main Street
Richmond, VA 23212

Dear Bob:

Enclosed you will find the documents from Dr. Meyer that are responsive to LILCO's document production requests. The documents include letters and handwritten notes, as well as those pages of pleadings and documents produced by LILCO in discovery on which Dr. Meyer wrote.

The following documents are not being produced either because they already are in LILCO's possession, or because they are subject to the work product privilege (denoted by an asterisk.)

1. Holbrook Bus Vibration;
2. Restoration of Transmission Facilities;
3. TID Report for seismic instrumentation;
4. Acts of nature, Interim emergency procedure;
5. Instructions/Parts Manual for 2500 KW Diesel Generator Unit;
6. SNPS, Final Safety Analysis Report, Sections 2.5 (Geology and Seismology) and 3.7 (Seismic Design);

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7. "Application for Exemption", LILCO, May 22, 1984;
8. "LILCO's Motion for Summary Disposition on Phase I Low Power Testing", LILCO, May 22, 1984;
9. "Motion for Summary Disposition on Phase II Low Power Testing", LILCO, May 22, 1984;
10. "Motion for Prompt Responses to LILCO's Summary Disposition Motions", LILCO, May 22, 1984;
11. "Order CLI-84-8", USNRC, May 16, 1984;
12. Letter of Hunton & Williams to KLHCP, dated April 20, 1984, with "Seismic Analysis of EMD 645 Engine" Report, by Electro-Motive Division of General Motors Corp, 3/14/77;
- 13.* Letter from L. C. Lanpher to P.A. Dempsey, dated April 23, 1984, with letter of C. Meyer to L. C. Lanpher dated April 18, 1984, and "Proposed Seismic Analysis" by C. Meyer;
- 14.* Draft of "Suffolk County Discovery Requests of LILCO";
- 15.* Letter of L. C. Lanpher to C. Meyer, dated April 16, 1984;
16. 2 site plans of SNPS;
- 17.* Miscellaneous transmittal notes accompanying some of the above documents, by Linda Jackson and Doug Scheidt;
- 18.* Letter dated May 31, 1984 from J. E. Birkenheier, transmitting LILCO discovery requests dated May 23, 1984, letter dated May 23, 1984 from R. M. Rolfe to L. C. Lanpher re discovery matters, and letter dated May 31, 1984, from A. E. Earley, Jr. to L. C. Lanpher concerning depositions;
19. Affidavit of Dr. Christian Meyer, dated April 18, 1984;

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

Robert M. Rolfe, Esq.

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20. Nondisclosure Agreement signed by visitors of SNPS, May 24, 1984, with letter from L. C. Lanpher to R. Rolfe, dated May 23, 1984 regarding May 24, 1984 site visit;
21. Agreement regarding disclosure of confidential security information, signed by C. Meyer, April 23, 1984;
- 22.* Letter dated June 1, 1984 from L. C. Lanpher to C. Meyer, with attached outlines, regarding trial preparation; and
23. Copies of photographs taken during May 24, 1984 site visit.

Sincerely yours,

/s/

Lawrence Coe Lanpher

LCL/jmw
Enclosures

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20036

1428 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 374-8112

TELEPHONE: (202) 452-7000
TELEX: 440209 HPH UI

1500 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 355-6500

WRITER'S DIRECT DIAL NUMBER
(202) 452-7011

June 12, 1984

Robert M. Rolfe, Esq.
Hunton & Williams
707 East Main Street
Richmond, VA 23212

Dear Bob:

Enclosed you will find the documents from Messrs. Weatherwax and El-Gasseir that are responsive to LILCO's document production requests.

Included are two of the five publications by Mr. Weatherwax which you requested: "Comments on Assessment of Accidental Pathways, Subtask D Report (Draft), A. D. Little, Inc. dated February 1978", for Office of Radiation Programs, EPA, July 12, 1978; and "Probabilistic Fission Power Plant Risk Analysis: Its Virtues and Limitations", presented as an invited paper at the American Physical Society General Meeting, April 1975, and published in Bulletin of the Atomic Scientists, September 1975. Probabilistic Risk Analysis of Nuclear Systems, Princeton University Seminar, May 1975 was a seminar in which Mr. Weatherwax participated. No paper was presented, and he no longer has any writings associated with the seminar. After a thorough search, Mr. Weatherwax has been unable to find copies of "Applications of Multi-Phase Fault Tree Analysis", presented as part of industry course entitled RISK ANALYSIS given at Flow Research, Inc., Kent, Washington, February 1973; and "A Comparison of Fault Tree Quantification Techniques", presented to System Safety Society Symposium, University of Southern California, April 1972.

Also included in the enclosed materials are documents generated by Messrs. Weatherwax and El-Gasseir, and copies of those pages of pleadings, publicly available documents, and documents produced by LILCO in discovery which contain notes or highlighting.

Robert M. Rolfe, Esq.
June 12, 1984
Page Two

(Note, first, that our staff have reproduced yellow highlighting which did not photocopy, and, second, that notes of comments by attorneys have been redacted from the one page document that begins "Comments of Dick Hubbard" and from the second page of the records of telephone conversations.)

The following documents are not being produced, either because they are publicly available or already in LILCO's possession, or because they are subject to the work product privilege (denoted by an asterisk.)

- 1.* Letter dated May 26, 1984 from John E. Birkenheier to M. M. El-Gasseir and R. K. Weatherwax regarding draft discovery requests;
- 2.* Letter dated May 1, 1984 from L. C. Lanpher to R. K. Weatherwax regarding trial preparation;
- 3.* Letter dated April 11, 1984 from L. C. Lanpher to R. K. Weatherwax regarding trial preparation;
- 4.* Draft discovery requests, undated;
- 5.* Letter dated June 5, 1984 from R. K. Weatherwax to L. C. Lanpher regarding depositions;
- 6.* Draft proposed work plan containing attorney's notes;
- 7.* Draft discovery requests, dated May 26, 1984;
- 8.* Letter dated May 31, 1984 from J. E. Birkenheier to M. M. El-Gasseir and R. K. Weatherwax regarding discovery;
- 9.* Letter dated April 17, 1984 from L. C. Lanpher to P. A. Dempsey regarding trial preparation;
- 10.* Letter dated June 1, 1984 from L. C. Lanpher to M. M. El-Gasseir and R. K. Weatherwax, with attachments regarding trial preparation;
11. Order Adopting Recommendations of the Staff Analysis of the Utilities' Criteria Status Report Filed As a Requirement of the Order Adopting Recommendations of the Bulk Power System Reliability Study, State of New York Public Service Commission, September 18, 1983;

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June 12, 1984

12. Data Summaries of Licensee Event Reports of Diesel Generators at U.S. Commercial Nuclear Power Plants, NUREG/CR-1362;
13. Nondisclosure Agreement, dated May 24, 1984;
14. Agreement Regarding Disclosure of Confidential Security Information, dated April 20, 1984;
15. Letter dated May 30, 1984 from K. J. Letsche to R. M. Rolfe with attached Suffolk County discovery requests;
16. Seismic Fragilities of Structures and Components at the Shoreham Nuclear Power Station, December, 1983;
17. Transcripts of low power hearings on April 24 and 25, 1984;
18. Review of Systems Interaction Methodologies, Battelle Columbus Labs, NUREG/CR-1896;
- 19.* Notes of telephone conversation with attorneys;
20. LILCO's Comments in Response to the Commission's Order of April 30th, Docket No. 50-322-OL-4, Pages 31-46;
21. Testimony of William E. Gunther, Jr., Docket No. 50-322-OL-4;
22. Testimony of Atambir S. Rao, Eugene C. Eckert, George F. Dawe and Robert M. Kascsak, Docket No. 50-322-OL-4;
23. Testimony of William G. Schiffmacher, Docket No. 50-322-OL-4;
24. Testimony of William J. Museler, Docket No. 50-322-OL-4;
25. Selected Sections of the Shoreham FSAR (Judges Only), Docket No. 50-322-OL-4;
26. Excerpts from Shoreham's Partial Initial Decision (September 21, 1983) (Judges Only), Docket No. 50-322-OL-4;
27. Affidavit of J. A. Notaro and W. E. Gunther; LILCO's description of its proposed four phases for fuel loading and low-power testing, Docket No. 50-322 (OL);

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28. Affidavit of W. G. Schiffmacher; LILCO's summation of its normal and other sources of AC power for supporting the Shoreham plant without relying upon the emergency diesel generators set, Docket No. 50-322 (OL);
29. Affidavit of Dr. Glenn G. Sherwood, Dr. Atambir S. Rao, and Mr. Eugene C. Eckert; Summary of General Electric Company's review of Chapter 15 of the Final Safety Analysis Report (FSAR) for Shoreham as sponsored by LILCO, Docket No. 50-322 (OL);
30. Affidavit of W. J. Museler; LILCO's description of procedures that utility intends to use during Phase II, III and IV of its proposed low-power testing program;
31. Material by LILCO's attorneys:
 - a. Letter to Lawrence Lanpher from Robert M. Rolfe - Long Island Lighting Company Shoreham Nuclear Power Station Docket No. 50-322-OL-4 (Low Power), May 23, 1984, and
 - b. Letter to Lawrence Lanpher from Anthony F. Earley, Jr., May 31, 1984;
32. Joint Response of Suffolk County and the State of New York to the Commission's Order of April 30, 1984, Docket No. 50-322-OL-4;
33. Affidavit of Robert K. Weatherwax;
34. Affidavit of Dr. Christian Meyer;
35. Affidavit of George Dennis Eley;
36. Affidavit of Geoge C. Minor;
37. Briefing on Quarterly Progress on Safety Goal Evaluation Report and Draft PRA Document, February 2, 1984, 70 pages;
38. Safety Goal Evaluation Plan Commission Briefing, February 2, 1984, T. E. Murley and M. L. Ernst;
39. Policy Issue Information, SECY-84-39, January 26, 1984, "Status Report on the Safety Goal Evaluation Plan";

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- a. Enclosure 1, "Schedule for Safety Goal Evaluation Plan Tasks";
 - b. Enclosure 2, "Outline of Safety Goal Evaluation Report";
 - c. Enclosure 3, "Table of Contents and Preface for the Draft PRA Reference Document";
40. Progress Report on Safety Goal Evaluation Plan, October 27, 1983, 42 pages;
 41. Safety Goal Evaluation Plan Commission Briefing, October 27, 1983, T. E. Murley;
 42. Policy Issue Information, SECY 84-428, October 20, 1983, "Status Report on the Safety Goal Evaluation Plan";
 - a. Enclosure 1:
 - A. Categorization of Public Comments
 - B. List of Commenters
 - C. Response to Comments
 - b. Enclosure 2, "Evaluation of Safety Goals: Staff Plans in Response to ACRS' Comments of April and July 1983";
 - c. Enclosure 3, "ACRS Letter of August 9, 1983 to Chairman Palladino";
 - d. Enclosure 4, "Summary Plan for Staff Actions to Evaluate the Commission's Proposed Safety Goals";
 - e. Enclosure 5, "Outline of the PRA Reference Document";
 43. Policy Issue Information, SECY 81-25, January 12, 1981, "Performance of Probabilistic Risk Assessment or Other Types of Special Analyses at High Population Density Sites";
 - a. Enclosure 1, "Discussion of Decision Criteria";

Robert M. Rolfe, Esq.
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- b. Enclosure 2, "Prioritization of Sites With Regard to Population Density";
44. PRA Review Manual, NUREG/CR-3485, BNL/NUREG-51710, September 1, 1983;
45. PRA Procedures Guide, NUREG/CR-2300, Vol. 1, "A Guide to the Performance of Probabilistic Risk Assessments for Nuclear Power Plants";
46. PRA Procedure Guide, NUREG/CR-2300, Vol. 2, "A Guide to the Performance of Probabilistic Risk Assessments for Nuclear Power Plants";
47. Draft Report, NUREG-1050, "Probabilistic Risk Assessment (PRA): Status Report and Guidance for Regulatory Application";
48. PRA Procedures Guide, NUREG/CR-2300, Vol. 1, Rev. 1, "A Guide to the Performance of Probabilistic Risk Assessments for Nuclear Power Plants", Review Draft, April 5, 1982;
49. NUREG/CR-2099, EGG-EA-5359, Rev. 1, "Common Cause Fault Rates for Diesel Generators: Estimates Based on Licensee Event Reports at U.S. Commercial Nuclear Power Plants 1976-1978";
50. NUREG-0420, Supplement No. 5, Safety Evaluation Report related to the operation of Shoreham Nuclear Power Station, Unit No. 1, Docket No. 50-322, April 1984;
51. NUREG-0880, Revision 1, For Comment, Safety Goals for Nuclear Power Plant Operation;
52. NUREG/CR-3028, BNL-NUREG-51600, A Review of the Limerick Generating Station Probabilistic Risk Assessment, Brookhaven National Laboratory, February 1983;
53. NUREG/CR-2934, SAND 82-2929, Review and Evaluation of the Indian Point Probabilistic Safety Study, Sandia National Laboratories;
54. Docket No. 50-322-OL-4 (Low Power), May 31, 1984, Order Establishing Schedule for Resumed Hearing;
55. Docket No. 50-322-OL-4 (Low Power), April 30, 1984, Order;

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56. Docket No. 50-322-OL-4 (Low Power), April 6, 1984, Memorandum and Order Scheduling Hearing on LILCO's Supplemental Motion for Low-Power Operating License;
57. Docket No. 50-322-OL-4 (Low Power), April 20, 1984, Testimony of John L. Knox and Edward B. Tomlinson;
58. Docket No. 50-322-OL, April 20, 1984, NRC Staff Testimony of Charles F. Gaskin Regarding Application for Low Power License;
59. Docket No. 50-322-OL-4 (Low Power), April 20, 1984, Testimony of Wayne Hodges;
60. Docket No. 50-322-OL-4 (Low Power), April 20, 1984, Agreement Regarding Disclosure of Confidential Security Information;
61. Docket No. 50-322-OL-4 (Low Power), May 24, 1984, Non-disclosure Agreement;
62. SNPS-1 FSAR:
 - a. Chapter 8, Pages 8.1-1 through 8.3-46, Revision 26, April 1982, and accompanying Figures and Tables;
 - b. Chapter 15, Pages 15.1-12 through 15A-49, Revision 12, July 1978;
63. Shoreham Probabilistic Risk Assessment, Chapter 1-5, Appendices A, B, C, D, E, and J, May 1, 1984;
64. Con Ed, Reliability of Power Supply, Order 17321, C27302;
65. Limerick Generating Station, Severe Accident Risk Assessment documents:
 - a. Preliminary Review of the Limerick Generating Station Severe Accident Risk Assessment, Vol. 1, Core Melt Frequency, August 15, 1983, Draft;
 - b. Severe Accident Risk Assessment, Vols. 1 and 2, NUS Corporation, April 1983;

Robert M. Rolfe, Esq.
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June 12, 1984

66. Probabilistic Risk Assessment System Level Fault Trees, Limerick Generating Station, R. T. Earle, General Electric Co., May 11, 1982;
67. Impact of Plant Design Changes on the Limerick Generating Station Severe Accident Risk Assessment (SARA, Supplement 1 of LGS SARA, NUS Report No. 4161, July 15, 1983, NUS Corporation);
68. NUREG/CR-1896, Review of Systems Interaction Methodologies, Battelle Columbus Labs., January 1981;
69. Indian Point Probabilistic Safety Study, 1982, Power Authority of the State of New York, Consolidated Edison Company of New York, Inc., Vols. 1 through 12;
70. Data Evaluation Concerning Expected Reliability of 2.5 MW General Motors EMD Black Start Mobile Diesel Generators;
71. Data Evaluation Concerning Expected Reliability of Shoreham 20 MWe Gas Turbine with Black Start Capability;
72. Internal memo (9/22/83) from Donaghue to Hanson to United Engineers of Constructors Inc. regarding New England Power Lynnway Diesel Plant evaluation of rebuilt (UTEX) diesels;
73. Monthly maintenance records for (Morrison Knudson) Power Systems in Lynn, Mass.;
74. M.P. 5, 6, 7, 8 (Lynn, Mass) UTEX Engines yearly/general maintenance note books;
75. Technical Specification: AC Sources Operating and Limiting Conditions for Operation;
76. Memo to system and district operators regarding operations during unusual emergencies;
77. Bi-Weekly Testing of GM Mobile Diesel Generators;
78. Glenwood No. 3 Black Start Test procedure-Rev. III, Operating Order No. 305, July 21, 1982;

Robert M. Rolfe, Esq.
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79. Operation of Units 1-4 Under Blackout Conditions Port Jefferson Power Station;
80. Shoreham Black Start;
81. Part I Shoreham Emergency Offsite Power Plans, Systems Analysis Engineering Report No. SAE-24 (February 23, 1984);
82. Restoration of AC power with on-site mobile generators interim emergency procedure (5% power) Revision A;
83. Acts of Nature-Interim Emergency Procedure (for 5% or less power);
84. A Brief Outline of the Startup Test Phase (Fuel Loading and Power Ascension Test Program);
85. New York Power Pool Automatic Generation Control;
86. System Operator Critical Tasks 10/83;
87. New York Power Pool Operating Policy; Operation during Abnormal Conditions and Major Emergencies;
88. New York Power Pool Operating Criteria; including bus voltage limits and exceptions for NYPP operating criteria;
89. Bus Voltage Limits, OP 1-9 and 9-5, Appendices B and C, January 3 and March 5, 1984;
90. Drawing of mobile diesel generators and physical layout of system;
91. Time Summary of the 5% Power Test;
92. Relay Function Switchyards Shoreham Wildwood Gas Turbines;
93. Mobile diesels routing and connections, ability to correct power and protection against reverse power, alternate AC power supply, DG Generator Power Block, General Assembly Plan;
94. Instructions/Parts Manual for 2600 KW Diesel Generator Unit-Book 1;

Robert M. Rolfe, Esq.
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95. Drawings of arrangement/locations of 20 MW gas turbine routing and connections;
96. Schematic line drawings for Shoreham/Holtsville/Holbrook-fire system, conduit, gas turbines;
97. Line Diagram of LILCO power systems;
98. ECCS LOCA Evaluations;
99. Data for E. Hampton Availability;
100. Data Evaluation Concerning Expected Reliability of Shoreham 20 MWe Gas Turbine with Blackstart Capability;
101. Shoreham Unit 2 phase-out procedure (dated 3/20/84);
102. Restoration of transmission facilities;
103. Evaluation of Seismic Vulnerability Concerning the Use of 20 MWe Power Pack Gas Turbine at Shoreham Site;
104. Evaluation of Startup Testing with a 5% Power Limitation;
105. U.S. Department of the Navy, Government Industries Data Exchange Program Documents:
 1. Reliability - Maintainability (R-M) Data Summaries, Volume 6:
 - 1.1 Part 1, June 1983;
 - 1.2 Part 2, August 1983;
 - 1.3 Part 3, October 1983;
 - 1.4 Part 4, February 1984;
 - 1.5 Part 5, February 1984;
 2. Reliability - Maintainability Data Interchange,

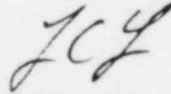
Robert M. Rolfe, Esq.
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- 2.1 Reliability - Maintainability (R-M)
Annualized Data Summaries;
 - 2.1.1 Vol. 3, Permanent Issue, December 1978;
 - 2.1.2 Vol. 4, Permanent Issue, July 1981;
 - 2.1.3 Vol. 5, Permanent Issue, May 1983;
- 2.2 Special Sort Mode Data Summaries,
Vol. 1, Permanent Issue, September 1983;
- 2.3 Special Sort Mean Repair Time Data Summaries,
Vol. 1, Permanent Issue, September 1983;
3. Failure Experience Data Interchange Index, Sorted
by Subject Category;
 - 3.1 Vol. 1, April 1981;
 - 3.2 Vol. 2, January 1982;
 - 3.3 Vol. 3, January 1984;
4. Failure Experience Data Interchange, Cross Reference
Index, Sorted by FEDP/Alert Number, Vol. 1,
January 1984;
5. Engineering Data Bank:
 - 5.1 Subject Categories Index for Reel Nos.
E168-E365, Vol. 1, Part 2, Materials
Handling, Wire and Cables, July 1983;
 - 5.2 Keyword Subject Index for Reel Nos.:
 - 5.2.1 E168-E365, Vol. 2, July 1983;
 - 5.2.2 E366-E405, Vol. 2, March 1984;
 - 5.3 Part No. and Manufacturer Index for Reel Nos.:
 - 5.3.1 E168-E365, Vol. 3, July 1983;
 - 5.3.2 E366-E405, Vol. 3, March 1984;
 - 5.4 Major Categories Index for Reel Nos. E406-
E419, February/April 1984;
 - 5.5 Abstracts of Reports for Reel No. E406-E419,
February/April 1984;

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106. Public Service Commission (NY) Microfiche # 17321-17328 containing Case File No. 27302; and
107. LILCO Line Diagrams detailing AC and DC power circuits for safety and non-safety related loads, normal and reserve station service transformers, diesel and gas turbine generators, and the 138- and 69-KV circuits for the Shoreham Nuclear Power Station.

Sincerely yours,



Lawrence Coe Lanpher

Enclosures

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.
WASHINGTON, D. C. 200361445 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(806) 574-5115

TELEPHONE: (806) 462-7000

TELEX: 440809 KIPF UI

1600 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 866-6500

June 14, 1984

WRITER'S DIRECT DIAL NUMBER

202/452-7027

Robert M. Rolfe, Esq.
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Dear Mr. Rolfe:

I am transmitting herewith copies of documents being produced by Messrs. Madan and Dirmeyer pursuant to LILCO's May 23, 1984 Request for Production of Documents.

Except to the extent of producing copies of pages which contain notations of the experts, we are not producing copies of the following documents, which we presume to be already in LILCO's possession:

1. LILCO 1982 Annual Report to Shareholders;
2. LILCO 1983 Annual Report to Shareholders;
3. Annual Report on SEC Form 10-K for 1963;
4. SEC Form 8-K dated February 21, 1984;
5. Prospectus dated January 3, 1984;
6. NRC Order dated May 16, 1984;
7. LILCO Application for Exemption dated May 27, 1984;
8. LILCO's May 30, 1984 Position Paper;
9. LILCO's "Trac. II" PSC Testimony filed by Messrs. Nozolillo, Sideris, Czumak, Crews, Wigod and Wackett; and

Robert M. Rolfe, Esq.
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Page 2

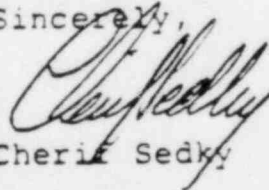
10. Computer generated financial statements of LILCO showing monthly and year-end information for calendar 1983, dated February 15, 1984, submitted by LILCO to the New York PSC.

Additionally, we are not producing copies of the following documents under claim of work product:

1. Undated handwritten note of Mr. Dirmeier to Larry Lanpher of this office;
2. Undated draft response of Messrs. Dirmeier and Madan to LILCO's document requests, prepared by Mr. Dirmeier for counsel; and
3. Experts' notes of meetings with counsel on May 10, 1984 and June 4, 1984.

Finally, please be advised that a notation in the margin of page 20 of LILCO's Application for Exemption, and a notation on the cover page of the enclosed "NECNP Contention VII" were both redacted as attorney work product.

Sincerely,



Cherif Sedky

CS/dk
Enclosures

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)

CERTIFICATE OF SERVICE

I hereby certify that copies of Suffolk County Response and Objections to Request for Production of Documents were served on the following this 22nd day of June, 1984, by U.S. mail, first class, except as otherwise noted.

Judge Marshall E. Miller, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Judge Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Judge Elizabeth B. Johnson
Oak Ridge National Laboratory
P.O. Box X, Building 3500
Oak Ridge, Tennessee 37830

Eleanor L. Frucci, Esq.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bernard M. Bordenick, Esq.
Edwin J. Reis, Esq.
Office of Exec. Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Edward M. Barrett, Esq.
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

Honorable Peter Cohalan
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

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

W. Taylor Reveley, III, Esq.*
Anthony F. Earley, Jr., Esq.
Robert M. Rolfe, Esq.
Hunton & Williams
707 East Main Street
Richmond, Virginia 23212

Mr. Martin Suibert
c/o Cong. William Carney
1113 Longworth House Office
Building
Washington, D.C. 20515

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

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

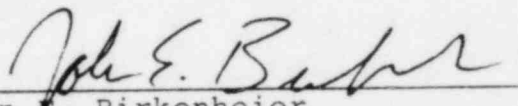
Stephen B. Latham, Esq.
John F. Shea, Esq.
Twomey, Latham and Shea
33 West Second Street
Riverhead, New York 11901

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

Mr. Brian McCaffrey
Long Island Lighting Company
Shoreham Nuclear Power Sta.
P.O. Box 618
North Country Road
Wading River, New York 11792

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

* By Federal Express


John E. Birkenheier
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

DATE: June 22, 1984