

at Shoreham are capable and reliable for fuel loading and low power testing (Id. at 139); or as to any of the four categories he was to study (Id. at 104). Dennis Eley, in his deposition, preliminarily concluded that the crankshaft was overrated but needed additional data before finalizing that opinion. Eley Deposition at 119 (Attachment 2). He indicated no final opinion on any individual components. Id. He was not prepared to state that shot peening was inadequate on replacement crankshafts. Id. at 143, 146-49. Aneesh Bakshi only broadly commented based upon what he had heard, but had no opinion in component-by-component questioning. Bakshi Deposition at 69-75 (Attachment 3).

This charade is hardly "meaningful participation." Not only does the County's pleading fail because it is unsupported, the County's challenge of the Shoreham EDGs fails because it has no basis in fact. Such dilatory tactics subvert the entire adjudicatory process. They would be subject to sanctions in federal court litigation and should not be condoned in this proceeding.

By its own admission, the County states that it has been unable to ascertain whether those cylinder heads were manufactured after 1980 and, therefore, whether they are similar to the cylinder heads at Shoreham. On its face, this issue fails to comply with the Board's requirement that a nexus be shown to Shoreham. Furthermore, the additional QA/QC procedures LILCO employed to ensure installation of acceptable heads makes LILCO's situation dissimilar from others.

In summary, all of the cylinder heads at Shoreham have been replaced with heads manufactured after 1980. The fire decks of a number of these heads have been inspected for casting defects, welding defects and thickness after approximately 300 hours of operation, including 100 hours at full load. No relevant indications or deviations were reported, and these heads are suitable for unlimited operation. (Owners Group Report On Cylinder Heads). Furthermore, LILCO has initiated a barring over procedure recommended by the NRC to detect leaks in the unlikely event a head were to leak. The County has presented no specification to refute that the extraordinary and conservative measures to assure the reliability and safety of the heads have been successful.

testing of EDG 103 is complete. Testing of EDG 103 will not change the extensive design and quality analyses that have already been performed on the engines. The County has had more than enough time to amass the information it needs to start this litigation. LILCO does not dispute that EDG 103 must successfully complete the pre-operational test program and post-testing inspections before an operating license may be issued. There is, however, no reason to delay the start of these proceedings.

(b) New cylinder block testing program is not defined.

Response: The cylinder block in EDG 103 has been replaced. EDG 103 will repeat the entire start-up test program. After the start-up program has been completed, the engine will be partially disassembled and inspected.

4. Procedures for increased engine maintenance, inspection, and surveillance activities, including crack indications monitoring relied upon by the Owners Group, have not yet been issued.

Response: See the response to Part III Section A, Paragraph 4(a) - (h).

The County has known for months what components were being evaluated by the Owners Group Program. The task descriptions, test procedures, component tracking list, and other information have been available for months. The County

records and operating histories from TDI at least two months ago. Yet, conspicuously absent from the County's request is a showing of any special circumstances or particular information in the possession of the TDI owners which would, under the Board's Bench Order, permit the County to obtain additional discovery from the TDI owners. The County simply recites that it needs more information in three areas and lists the owners involved for each area without any sort of specification or particularization as to how this information will add anything to the information already available.

What the Filing does show is that the majority of instances involved relate to marine applications of TDI diesels. But the County's own experts, Aneesh Bakshi and Stanley Christensen, have stated in their depositions that the operating conditions and the stresses operating upon marine diesels are much different from those operating in nuclear standby application. See Bakshi Deposition at 89 and 100 (Attachment 3); Christensen Deposition at 78-79 (Attachment 15).

Furthermore, the County's assertion that piston crown cracking is an area that should be added to its contentions and in which discovery should be conducted ignores the Board's Shoreham specific requirement. There is no evidence in this proceeding that any piston crowns in the Shoreham EDGs have cracked. The information the County "may" be seeking in these

LILCO, June 29, 1934

CERTIFICATE OF SERVICE

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

I hereby certify that a copy of the corrections to LILCO's Response To Suffolk County's Filing Concerning Litigation Of Emergency Diesel Generator Contentions was served this date upon the following by first class-mail, postage prepaid:

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

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

Robert E. Smith, Esq.
Guggenheimer & Untermyer
80 Pine Street
New York, New York 10005

Martin Bradley Ashare, Esq.
Attn: Patricia A. Dempsey, Esq.
County Attorney
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11787

Bernard M. Bordenick, Esq.
David A. Repka, Esq.
Richard J. Goddard, Esq.
U.S. Nuclear Regulatory
Commission
Maryland National Bank Bldg.
7735 Old Georgetown Road
Bethesda, Maryland 20814

Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Alan R. Dynner, 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

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

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
P. O. Box 398
Riverhead, New York 11901

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

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

Howard L. Blau
217 Newbridge Road
Hicksville, New York 11801

Jonathan D. Feinberg, Esq.
New York State
Department of Public Service
Three Empire State Plaza
Albany, New York 12223



Darla B. Tarletz

Hunton & Williams
P. O. Box 1535
Richmond, Virginia 23212

DATED: June 29, 1984