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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

DOCKETED
USNRC

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

Docket No. 50-322-OL

MOTION TO QUASH SUBPOENAS

Pursuant to 10 C.F.R. § 2.720(f), Long Island Lighting Company moves to quash the subpoenas issued upon the application of Suffolk County on July 10, 1984, requiring Howard Blanding, Robert Guiffra and Robert Woytowich to appear and testify on July 18, 1984. The grounds for this motion are as follows:

1. Suffolk County first learned that ABS had approved the 13 inch x 12 inch crankshaft used in the Shoreham Emergency Diesel Generator on May 9, 1984. (Johnston Dep. at 24-28).

2. Suffolk County was informed on May 11, 1984 that Messrs. Guiffra and Woytowich of ABS attended a meeting with representative of LILCO, TDI, FaAA and PEI to discuss crankshaft certification. (Yang Dep. at 20-22). Suffolk County was also informed on May 11, 1984 that Dr. Simon Chen attended the meeting at ABS. (Yang Dep. at 22).

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3. Suffolk County deposed Dr. Chen on May 15, 1984. Suffolk County did not ask Dr. Chen any questions concerning the substance of the discussion at the meeting at ABS and did not ask Dr. Chen any questions related to ABS certification of the crankshafts.

4. The Board's Bench Order of February 22, 1984 did not prevent Suffolk County from utilizing formal discovery procedures to obtain information from ABS during the discovery period. Nonetheless, Suffolk County did not seek formal discovery from ABS until its application for issuance of subpoenas on July 10, 1984.

5. In its July 5, 1984 ruling, the Board ruled that Suffolk County was not entitled to the additional information it sought in Section IV of its June 11, 1984 Filing (Tr. 21,876-77). The County specifically informed the Board on July 5, 1984, that it wanted to subpoena witnesses from ABS. (Tr. 21,772-73).

6. Notwithstanding the Board's July 5, 1984 Order prohibiting the County from seeking this discovery, the County sought subpoenas for the depositions of Messrs. Blanding, Guiffra and Woytowich.

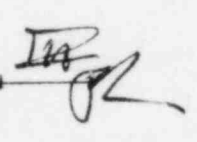
7. The County has presented no valid reason why the Board's Order of July 5, 1984 should be changed. The matters about which the County seeks information were discussed at the July 5, 1984 hearing and ruled upon by the Board. In addition,

the County had ample opportunity during the discovery period to depose ABS witnesses. The County chose not to do so. The County should not be permitted to conduct this additional discovery, which will require LILCO to prepare for and attend these depositions, at a time when the parties are engaged in the Preparation of testimony.

WHEREFORE, Long Island Lighting Company respectfully requests this Board to quash the subpoenas issued on July 10, 1984.

This the 13^R day of July, 1984.

LONG ISLAND LIGHTING COMPANY

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DATED: July 13, 1984

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 copies of LILCO's Motion to Quash
Supoenas were served this date upon the following by
first-class mail, postage prepaid, or by hand, as indicated by
as asterisk:

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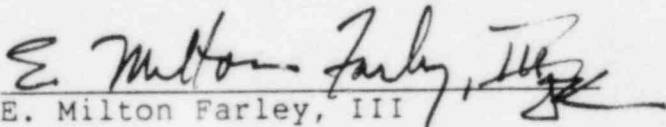
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E. Milton Farley, III

1 question which I think is unintended by the questioner.
2 There may be a question as to whether A.B.M. checked the
3 shafts as they ultimately turned out or checked
4 calculations in the original drawings. You can ask about
5 both. Ask anything you want.

6 (Discussion off the record between the
7 witness and Mr. Smith.)

8 MR. SCHEIDT: Q. Mr. Smith, I would appreciate
9 it if you didn't consult with the witness.

10 MR. SMITH: I will give the question any advice
11 I want. There is no question pending.

12 MR. SCHEIDT: There certainly is.

13 MR. SMITH: Let's have it read back. I don't
14 think there was a question.

15 MR. SCHEIDT: There was a question asked and
16 interrupted.

17 MR. SMITH: Let's have it read back. It's my
18 recollection there was no question.

19 MR. SCHEIDT: Would you read the question.

20 (Question read.)

21 MR. SMITH: I would like to note as the result
22 of the long pause it is unclear to me whether there is a
23 question pending.

24 MR. SCHEIDT: Whether or not there is a
25 question pending I will ask a question now.

26 Q. Did you have any communications with anyone at
27 A.B.S. concerning the replacement crankshafts?

28 A. Yes, I did.

1 meetings?

2 A. There was Mr. Gene Montgomery of LILCO, Dr.
3 Simon Chen of P.E.I., Dr. Paul Johnston of Failure
4 Analysis Associates.

5 Q. Was there anyone else?

6 A. And myself.

7 Q. How many meetings took place with A.B.S.?

8 A. Just that one.

9 Q. When was that meeting held?

10 A. The exact date slips me, but approximately
11 probably two months ago.

12 Q. And what were the subjects discussed at that
13 meeting?

14 A. We want to get A.B.S.'s approval of these
15 engine generator sets on the basis of their torsional
16 characteristics using A.B.S.'s requirements for snipboard
17 service.

18 Q. How do you go about getting A.B.S. approval for
19 those engines?

20 MR. SMITH: Are you asking him what he did?

21 MR. SCHEIDT: I am asking how the process is
22 done.

23 MR. SMITH: Sure. Generally speaking.

24 THE WITNESS: Generally speaking, the various
25 components of the engine which requires A.B.S. approval
26 or which A.B.S. requires approval should be submitted to
27 A.B.S. for their scrutiny and approval.

28 MR. SCHEIDT: Q. When you say the components

1 Q. What was the nature of those communications
2 that you had?
3 A. We had meetings with two gentlemen in their
4 machinery group.
5 Q. And did you initiate the contact with A.B.S.?
6 MR. SMITH: Do you mean by "you," Mr. Yang
7 personally?
8 MR. SCHEIDT: Yes, I do.
9 THE WITNESS: To the best of my recollection, I
10 was not the one who initiated the contact.
11 MR. SCHEIDT: Q. Why was A.B.S. contacted?
12 A. I do not know.
13 I was present. I was one of the parties that
14 was present at the meeting at A.B.S.
15 Q. Who else was at the meeting at A.B.S.?
16 A. There was the two gentlemen from A.B.S.
17 Q. Do you recall their names?
18 A. I believe the one was Robert Giuffra.
19 Q. Do you know how that is spelled?
20 A. Vaguely. G-i-u-f-f-r-a.
21 The other person was Richard Woytowich.
22 Q. Can you spell that too?
23 A. Again vaguely --
24 MR. SMITH: It's not a test of your spelling
25 ability, Mr. Yang. Just do your best.
26 THE WITNESS: I understand. I try my best.
27 W-o-y-t-o-w-i-c-h.
28 MR. SCHEIDT: Q. Who else was present at those

1 So if you compare that to a ship where an engine may,
2 for example, be powering a propeller, the speed range is
3 much more variable.

4 We were interested in understanding what ABS thought
5 was a reasonable speed range for a stationary diesel in
6 nuclear service.

7 Q Do you know whether generators on, diesel generators
8 on ships are run at constant speeds?

9 MS. TARTLETZ: Objection. What diesel generators
10 on ships? Can you be more specific?

11 MR. SCHEIDT: In general.

12 THE WITNESS: Diesel engines are used for many
13 purposes on ships. Some of them are, I would imagine,
14 run at a fixed speed to generate, for example, electricity.

15 Others may run at a variable speed. I'm not, I do
16 not know particularly how diesels are used in ships except
17 that their speed is likely to be more variable than that
18 in a nuclear plant.

19 MR. SCHEIDT: Q Do you know whether diesel genera-
20 tors used for electrical power on ships run at a constant
21 speed?

22 A I don't know.

23 Q Who are the individuals or individual at ABS with
24 whom you spoke?

25 A I don't recall. I could get the names for you, but
26 I don't recall.

27 Q Was there more than one individual?

28 A There were two individuals.

1 Q Were there any other areas that you discussed
2 with ABS for clarification purposes?

3 A Not to my recollection.

4 Q Do you know whether ABS itself has performed any
5 calculations as to the adequacy of the replacement crank-
6 shafts at Shoreham?

7 A I don't know.

8 Q Do you know whether ABS has certified a drawing, the
9 drawing of the replacement crankshaft?

10 A I have not seen such a certified drawing, but it is
11 my understanding that they have.

12 Q How did you gain that understanding?

13 A In a conversation with Roland Yang of Transamerica
14 Delaval.

15 Q Do you know who requested ABS to certify the drawing
16 of the replacement crankshaft?

17 A I do not.

18 Q Do you know the organization that requested ABS
19 to do so?

20 A I assume Transamerica Delaval.

21 Q Have you ever seen the certificate?

22 A No, I have not.

23 Q Did you have any discussions with anyone else
24 outside of FaAA concerning whether the replacement crank-
25 shafts meet the ABS rules?

26 A Yes, I did.

27 Q Can you identify those individuals?

28 A Ronald Yang of Transamerica Delaval. Eugene

1 Montgomery of Long Island Lighting Company.

2 Q With whom did you speak at LILCO?

3 A Eugene Montgomery.

4 Q Oh. Is there anyone else besides Mr. Montgomery
5 from LILCO?

6 A It is possible that there was, but my direct communica-
7 tion would have been with Gene Montgomery.

8 Q Do you know if they performed any calculations on that
9 same subject?

10 A I believe that Ronald Yang did.

11 Q Do you know the results of those calculations?

12 A I guess I don't, no, I don't.

13 Q What discussions did you have with him concerning
14 compliance with ABS standards?

15 THE WITNESS: Beg pardon, could you repeat the
16 question?

17 MR. SCHEIDT: Q What discussions did you have with
18 Mr. Yang concerning whether the replacement crankshafts meet
19 the ABS standards?

20 A We discussed the torsional vibratory stresses and
21 whether they meet the allowables of ABS.

22 Q Was there anything else you discussed with him con-
23 cerning that subject?

24 A Yes. We discussed how, we discussed both the
25 calculations and the use of the test results from the
26 Stone-Webster and FaAA tests, how those, the results of
27 that test, the stresses that are computed from the results
28 of that test.

1 Q What did you discuss concerning the use of those
2 test results?

3 A Failure Analysis provided Roland Yang either direct-
4 ly or through Stone & Webster the torsigraph results on the
5 replacement crankshaft so that the nominal torsional stresses
6 could be computed.

7 MR. SCHEIDT: Why don't we take a break until about
8 4:00 o'clock.

9 (Recess from 3:52 p.m. to 4:06 p.m.)

10 MR. SCHEIDT: Q Do you know what information was
11 supplied to ABS in connection with certification by ABS
12 of the drawing of the replacement crankshaft?

13 A No, I don't.

14 Q In your discussions with Roland Yang, did you, you
15 discussed the use of the test results on the torsigraphs,
16 isn't that correct?

17 A Yes.

18 Q Did you have additional discussions with Roland Yang
19 on other matters concerning the replacement crankshafts?

20 A Yes, I did.

21 Q What were those discussions about?

22 A I don't believe I am going to be able to recall all of
23 the discussions. I talked to Roland Yang numerous times
24 both in person and on the telephone and I certainly will have
25 a difficult time in trying to recall all of the things that
26 we have talked about.

27 But, you know, I have for example talked to Roland
28 Yang about torsional calculations in general, about methods

1 for doing them.

2 Q I'm speaking with reference particularly to the
3 replacement crankshafts.

4 A Well, the reasons for my contacts with Roland Yang
5 was because of the replacement crankshafts. All of my
6 conversation would in some way reflect the interaction
7 because of the replacement crankshafts. So perhaps you would
8 repeat the question again.

9 Q See if I can ask it in a better fashion: Did you
10 discuss with him whether the replacement crankshafts met
11 design codes?

12 MS. TARLETZ: Objection. Can you specify what design
13 code?

14 MR. SCHEIDT: Any design codes.

15 THE WITNESS: To the extent that ABS design code,
16 yes, we did discuss, I did discuss with Roland Yang whether
17 the replacement crankshafts met ABS.

18 MR. SCHEIDT: Q Any other design code?

19 A No other design code.

20 Q Thank you. Did you have any discussions with
21 Drs. Pischinger, Tholen and Kreuter concerning whether the
22 replacement crankshafts meet design code requirements?

23 MS. TARLETZ: Again, objection. What design code?

24 MR. SCHEIDT: Same answer; any design codes.

25 THE WITNESS: I have not discussed whether the
26 replacement crankshafts meet any design codes with those
27 gentlemen.

28 MR. SCHEIDT: Q What was the nature of your