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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)
(Shoreham Nuclear Power Station,)
Unit 1))

LILCO'S MOTION TO ADMIT
SUPPLEMENTAL TESTIMONY
ON SUFFOLK COUNTY CONTENTION
REGARDING CYLINDER BLOCKS

Long Island Lighting Company (Lilco), for good cause, moves the Board for leave to file the attached Supplemental Testimony and in support of such Motion states:

(1) Lilco's Supplemental Testimony on cylinder blocks is limited to a discussion of new information on cam gallery indications in the EDGs. This Supplemental Testimony is necessary to apprise the Board, the NRC Staff and the other parties of relevant and material evidence recently obtained as a result of the endurance test run currently being conducted by Lilco on the EDG 103.

(2) In summary, the Supplemental Testimony advises the parties that depth gage measurements of the indications in the replacement EDG 103 block have demonstrated that the indications are shallow surface imperfections. The deepest indication was measured to have a depth of .014 inch. Second, the testimony reports that strain gage testing on the

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replacement EDG 103 block, which is also applicable to the EDG 101 and EDG 102, demonstrates that the vertical stresses in the cam gallery area are compressive, thus preventing any crack propagation.

(3) This Supplemental Testimony could not have been filed before today. Although Lilco received some preliminary cam gallery strain gage data on October 10, which was produced to the County and Staff at the deposition of Drs. Rau and Wachob on October 11, the vertical stress results from the strain gages were not available until October 27.

(4) This testimony will not prejudice the County or the Staff. The fact that strain gage tests would be performed in response to requests by the NRC Staff was disclosed to the County on Tuesday, October 2, and the County's counsel and consultants saw the placement of some of the gages on October 3. The earliest preliminary cam gallery strain gage data was made available to the NRC Staff and the County at the deposition of Drs. Rau and Wachob, and the County in fact examined FaAA on the preliminary data and attached it to the deposition as Exhibit 3. Similarly, the County examined FaAA concerning whether depth gage measurements would be made of the indications in the replacement EDG 103 block. These depth gage inspection reports were provided to the County and the Staff on October 21, which was the day after Lilco's counsel received the reports.

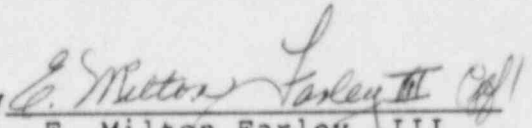
(5) The relevance and materiality of the information contained in Lilco's Supplemental Testimony is demonstrated by the fact that both the County and the Staff discuss the indications found in the replacement EDG 103 block in their testimony. Further, the Staff testimony actually addresses the desirability of obtaining strain gage measurements of the stresses in the cam gallery area.

(6) The Supplemental Testimony is necessary to make the record fully and accurately reflect existing facts which have recently been obtained. Unless the record includes the facts regarding the depths of the indications in the replacement EDG 103 cam gallery, and the data on the actual state of stress in the cam gallery of the EDGs, there cannot be a full, complete and meaningful adjudication of the cylinder block contentions.

WHEREFORE, Lilco respectfully requests that the Board admit Lilco's Supplemental Testimony on cylinder blocks.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

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DATED: October 29, 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 Admit Supplemental Testimony on Suffolk County Contention Regarding Cylinder Blocks were served this date upon the following by first-class mail, postage prepaid, or by hand as indicated by an asterisk:

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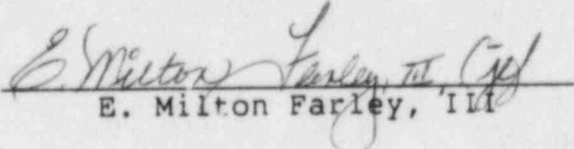
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