STATEMENT OF MATERIAL FACTS IN SUPPORT
OF THE JOINT MOTION OF SUFFOLK COUNTY
AND NEW YORK STATE FOR SUMMARY DISPOSITION
OF EMERGENCY PLANNING CONTENTIONS 24.0, 74 AND 75
(RELOCATION CENTERS)

- 1. LILCO has no agreement with Suffolk County to use Suffolk County Community College as a relocation center in the event of an emergency at the Shoreham plant. LILCO's Testimony on Phase II Emergency Planning Contentions 24.0, 74 and 75 (Relocation Centers), dated July 30, 1984 (hereinafter, "LILCO's proposed testimony"), at 13-15, 20-22; Direct Testimony of Robert T. Kreiling on behalf of Suffolk County Regarding Contention 24.0 (hereinafter, "Kreiling testimony"), at 2.
- 2. Suffolk County Community College is not relied upon in the LILCO Plan. LILCO's proposed testimony, at 21-22.
- 3. Neither the LILCO Plan nor LILCO's proposed testimony identifies or designates any specific relocation center(s) for use by the public during an emergency at Shoreham. LILCO's proposed testimony, at 15-16.

RELATED CORRESPONDENCE

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## Before The Atomic Safety And Licensing Board

DOCKETED

"84 AGD 15 P12:06

In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Station, Unit 1)

Docket No. 50-322 (O.L.) (Emergency Planning)

## CEPTIFICATE OF SERVICE

I hereby certify that copies of the Joint Motion of Suffolk County and Governor Mario M. Cuomo, Representing the State of New York, for Summary Disposition of Emergency Planning Contentions 24.0, 74 and 75 (Relocation Centers) and Opposition to LILCO's Motion to Admit Revised Testimony on Contentions 24.0, 74 and 75 have been served on the following this 13th day of August 1984 by U.S. Mail, first class, except as otherwise indicated.

- \* James A. Laurenson, Chairman Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555
- \* Dr. Jerry R. Kline Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555
- \* Mr. Frederick J. Shon Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Edward M. Barrett, Fsq. General Counsel Long Island Lighting Company 250 Old Country Road Mineola, New York 11501 Ralph Shapiro, Esq. Cammer and Shapiro 9 East 40th Street New York, New York 10016

\*\* W. Taylor Reveley III, Esq. Hunton & Willaims P.O. Box 1535 707 East Main Street Richmond, Virginia 23212

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

<sup>\*</sup> By Hand

<sup>\*\*</sup> By Federal Express

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

Nora Bredes
Executive Director
Shoreham Opponents Coalition
195 East Main Street
Smithtown, New York 11787

Marc W. Goldsmith
Energy Research Group, Inc.
400-1 Totten Pond Road
Waltham, Massachusetts 02154

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

Joel Blau, Esq.
New York Public Service Commission.
The Governor Nelson A. Rockefeller
Building
Empire State Plaza
Albany, New York 12223

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

\* Edwin J. Reis, Esq.
Bernard M. Bordenick, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Stuart Diamond
Business/Financial
NEW YORK TIMES
229 W. 43rd Street
New York, New York 10036

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

Docketing and Service Section Office of the Secretary 1717 H Street, N.W. U.S. Nuclear Regulatory Comm. Washington, D.C. 20555

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

\* Eleanor L. Frucci, Esq.
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

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

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

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

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

Spence Perry, Esq. Associate General Counsel Federal Emergency Management Agency Washington, D.C. 20471

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

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

KIRKPATRICK, LOCKHART, HILL,

CHRISTOPHER & PHILLIPS

1900 M Street, N.W., Suite 800 Washington, D.C. 20036

DATE: August 13, 1984