

051

KIRKPATRICK, LOCKHART, HILL, CHRISTOPHER & PHILLIPS

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1900 M STREET, N. W.

WASHINGTON, D. C. 20036

TELEPHONE: (202) 452-7000

TELEX: 440209 HIPH UI

DOCKETED
USNRC

'84 SEP 25 10:06
1900 OLIVER BUILDING
PITTSBURGH, PENNSYLVANIA 15222
(412) 355-6500

1426 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 374-6112

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

September 24, 1984

WRITER'S DIRECT DIAL NUMBER

202/452-7011

James A. Laurenson, Chairman
Dr. Jerry R. Kline
Mr. Frederick J. Shon
Administrative Judges
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
4350 East-West Highway
4th Floor
Bethesda, Maryland 20814

Re: Long Island Lighting Company;
Shoreham Nuclear Power Station,
Unit 1; Docket No. 50-322-OL-3

Dear Administrative Judges:

Enclosed you will find the "Opposition of Suffolk County and the State of New York to LILCO's Motion for Summary Disposition of Contentions 1-10 (the "Legal Authority" Issues)." The affidavit of Richard C. Roberts which is attached thereto has not yet been executed. An executed copy of Mr. Roberts' affidavit will be submitted as soon as possible.

Sincerely yours,

Lawrence Coe Lanpher
Lawrence Coe Lanpher

LCL/dk
Enclosure

cc: Service List

8409260267 840924
PDR ADOCK 05000322
G PDR

DS03

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'84 SEP 25 P3:06

Before the Atomic Safety and Licensing Board OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)

LONG ISLAND LIGHTING COMPANY)

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

) Docket No. 50-322-OL-3
) (Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of OPPOSITION OF SUFFOLK COUNTY AND STATE OF NEW YORK TO LILCO'S MOTION FOR SUMMARY DISPOSITION OF CONTENTIONS 1-10 (THE "LEGAL AUTHORITY" ISSUES), dated September 24, 1984, have been served on the following this 24th day of September 1984 by U.S. mail, first class, except as otherwise noted.

James A. Laurenson, Chairman *
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Dr. Jerry R. Kline *
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Mr. Frederick J. Shon *
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

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

Spence Perry, Esq.
Associate General Counsel
Federal Emergency Management Agency
Washington, D.C. 20472

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

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

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

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

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

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

Mr. 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

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

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

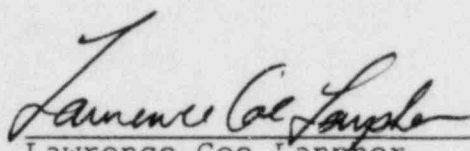
Hon. Peter F. Cohalan
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

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

Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
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, Room 1349
New York, New York 10278



Lawrence Coe Langner
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

DATE: September 24, 1984

* By Hand
By Federal Express