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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
LONG ISLAND LIGHTING COMPANY	)	Docket <del>No.</del> 50-322-OL-3
	)	(Emergency Planning)
(Shoreham Nuclear Power Station,	)	
Unit 1)	)	
	)	

SUFFOLK COUNTY AND STATE OF  
NEW YORK REPLY TO LILCO STRIKE MOTION

On March 5, 1985, LILCO filed a pleading styled "LILCO's Motion to Strike Intervenors' Unauthorized March 1, 1985 Pleading." LILCO's Motion amounts to nothing more than baseless allegations that have no place in a serious adjudicatory proceeding. Indeed, such needless flow of paper merely diverts resources from the real issues which must be addressed. LILCO should be admonished to cease such improper filings.

The gist of LILCO's Motion is its unsupported allegation that the County/State March 1 motion for leave to reply to LILCO's February 26 pleading was in fact a substantive response. LILCO's February 26 pleading, including attachments, was 64 pages. It is hardly surprising, therefore, that it took 15 pages for the County and State to detail the reasons that a reply is necessary. A substantive reply would take considerably more than 15 pages. Further, a motion for leave to reply can hardly be

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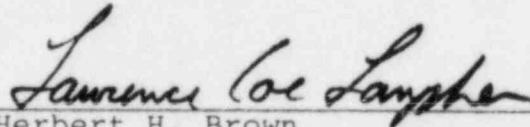
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characterized as an improper "substantive reply" simply because it outlines intended substantive responses; how else could a party demonstrate to the Board that the requested reply should be authorized?

In short, LILCO's March 5 Motion is itself the pleading that is unauthorized. This Board has pending the County/State March 1 Motion seeking leave to file a substantive reply. We request this Board to rule on that March 1 Motion as soon as possible so that we can get on with this proceeding.

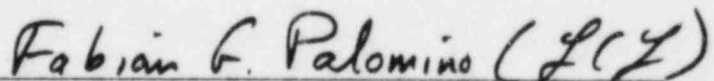
Respectfully submitted,

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March 6, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

\_\_\_\_\_  
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 SUFFOLK COUNTY AND STATE OF NEW YORK REPLY TO LILCO STRIKE MOTION, dated March 6, 1985, have been served on the following this 6th day of March 1985 by U.S. mail, first class, except as otherwise noted.

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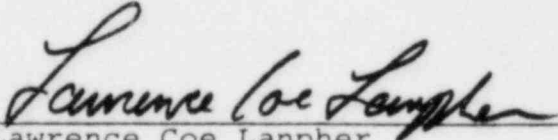
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DATE: March 6, 1985

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\* By Hand  
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# By Federal Express