

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Commission

DOCKETED
USNRC

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

'84 DEC -5 P5:14

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. 50-322-OL-4
(Low Power)

NEW YORK STATE AND SUFFOLK COUNTY SUPPLEMENTARY AFFIDAVIT
IN SUPPORT OF COMMENTS FILED NOVEMBER 29 AND
REQUEST FOR ORAL ARGUMENT FILED NOVEMBER 29

On November 29, New York State and Suffolk County submitted comments concerning the Licensing Board's decision which, in effect, recommended issuance of a low power license for Shoreham. The State and County also filed a Request for the Commission to reconsider its decision denying an opportunity to the State and County to present oral arguments against issuance of a low power license. The instant pleading is to transmit to the Commission an affidavit in support of the State and County's November 29 filings. The enclosed affidavit is the sworn statement of Eugene J. Gleason, Director of the New York State Energy Office, Bureau of Planning. Mr. Gleason is responsible for the management of electricity supply planning studies.

Mr. Gleason concludes that, "the electricity capacity represented by the Shoreham nuclear power plant does not appear to be needed to meet anticipated near term electricity demand, either

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*add J. Gleason
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on a statewide or individual electric service territory basis." (Affidavit, p. 2). Exhibit EJG-2, attached to Mr. Gleason's affidavit, shows that "the electricity reserve margin for the LILCO electric service territory would be adequate through 1997 without commercial operation of the Shoreham plant."

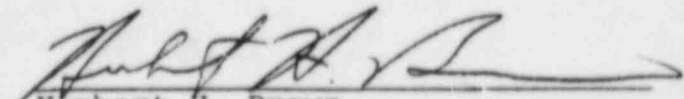
Mr. Gleason's conclusion is based on three analyses performed by the planning staff of the State Energy Office under his supervision. His conclusion is further supported by analyses conducted by LILCO itself and by economic consultants to Suffolk County.

Given that the quantity of electricity represented by Shoreham will not be needed for 13 years, there is no reason why the Commission should consider issuing a low power license to LILCO that would permit contamination of the Shoreham reactor while determinative emergency preparedness issues are pending in New York State Supreme Court. What conceivable public purpose could justify the NRC failing to wait several months in deciding whether to license a plant which is not needed for 13 years?

Respectfully submitted,

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