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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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USNRC

March 1, 1985

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Morton B. Margulies, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

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

Dear Administrative Judges:

Reference is made to the "NRC Staff/FEMA Response to Memorandum and Order Granting LILCO's Motion to Reopen the Record" filed on February 19, 1985. Attached to that "response" was a letter from the FEMA Regional Counsel which forwarded the "Affidavit of Thomas E. Baldwin, Joseph H. Keller, Roger B. Kowieski and Phillip H. McIntire". Mr. Keller was unable to execute the affidavit, as the other three affiants did, at the time it was prepared. FEMA has requested me to forward a copy of the Affidavit in question which was executed by Mr. Keller on February 25, 1985.

Sincerely,

Bernard M. Bordenick
Counsel for NRC Staff

Enclosure: As stated

cc: w/enclosure
Service List

8503050564 850301
PDR ADOCK 05000322
G PDR

DS07

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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USNRC

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

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AFFIDAVIT OF THOMAS E. BALDWIN, JOSEPH H. KELLER
ROGER B. KOWIESKI and PHILIP H. McINTIRE

1. Our names are Thomas E. Baldwin, Joseph H. Keller, Roger B. Kowieski and Philip H. McIntire. We have appeared before the Atomic Safety and Licensing Board in the above captioned proceeding. Our professional qualifications and affiliations appear in our pre-filed testimony following page 12,174 of the transcript of that proceeding.

2. Our affidavit is based on a review of the Affidavit of Elaine D. Robinson and the attachments thereto; NUREG 0654, FEMA REP-1, Rev. 1; on our previous testimony in this proceeding, and the review of the applicable sections of the Long Island Lighting Company, Local Offsite Radiological Emergency Response Plan, Transition Plan, Revision 4.

3. It should be noted that NUREG 0654, FEMA-REP-1, Rev. 1 contains two citations with regard to relocation centers, J.10.h and J.12. In emergency response plans the functions to be performed in a relocation center can be divided into two (2) principal functions:

- ° reception center functions including the registration, monitoring and decontamination of evacuees, if required
- ° congregate care functions including the temporary housing, feeding and provisions for first aid of proven uncontaminated evacuees

The above two (2) functions can be co-located or may be conducted in separate facilities. Revision 4 of the LILCO Transition Plan states that these two functions are to be performed in the same facility (see page 4.2-1 lines 37-44). It is our understanding that during the hearing before the ASLB LILCO stated that these two functions were to be conducted at separate facilities. (Tr. ff 14, 707 at p. 15-16, Tr. 14, 779, 14, 801-802, 14, 812-14, 813).

4. The Nassau Veterans Memorial Coliseum is being offered as the sole reception center for use by LERO in the event of a radiological emergency at the Shoreham Nuclear Power Station.

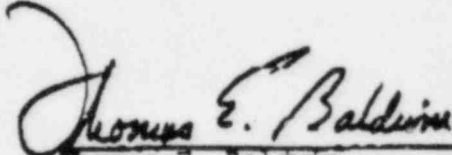
5. Its distance from the Shoreham Nuclear Power Station does not preclude utilization of the Nassau Veterans Memorial Coliseum as a reception center.

6. Based upon an examination of the material submitted to FEMA the Nassau Veterans Memorial Coliseum appears to be a suitable facility for LILCO to use as a reception center. It has parking areas, showers and other amenities normally needed at reception centers.

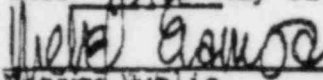
7. Final approval of the Nassau Veterans Memorial Coliseum as a reception center would be contingent upon two (2) considerations:

- details of the separation of the reception and congregate care functions must be incorporated within the LILCO Transition Plan and be reviewed and approved by the Regional Assistance Committee
- an exercise must be held in which a demonstration of the reception center function can be evaluated.

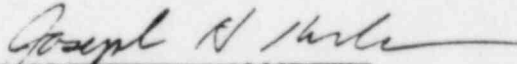
Dated: February , 1985


Thomas E. Baldwin

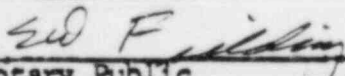
Subscribed and sworn to before me a Notary Public by Thomas E. Baldwin.
This 15th day of February, 1985.

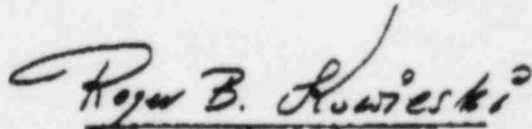

Notary Public
My commission expires:

MICHEL EVANUSA
Notary Public, State of New York
No. 31-4823708
Qualified in New York County
Commission Expires March 30, 1986

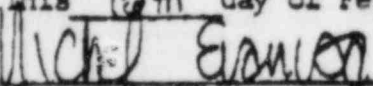

Joseph H. Keller

Subscribed and sworn to before me a Notary Public by Joseph H. Keller.
This 25th day of February, 1985.

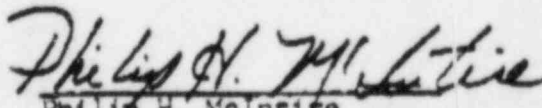

Notary Public
My Commission expires: *Non Expiring*


Roger B. Kowleski

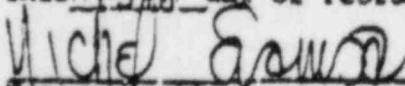
Subscribed and sworn to before me a Notary Public by Roger B. Kowleski.
This 15th day of February, 1985.


Notary Public
My Commission expires:

MICHEL EVANUSA
Notary Public, State of New York
No. 31-4823708
Qualified in New York County
Commission Expires March 30, 1986


Philip H. McIntire

Subscribe and sworn to before me a Notary Public by Philip H. McIntire.
This 15th day of February, 1985


Notary Public
My Commission expires:

MICHEL EVANUSA
Notary Public, State of New York
No. 31-4823708
Qualified in New York County
Commission Expires March 30, 1986