

LONG ISLAND LIGHTING COMPANY

EXECUTIVE OFFICES: 250 OLD COUNTRY ROAD . MINEOLA, NEW YORK 11501

February 8, 1985

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, MD 20814

Dear Mr. Denton:

The purposes of this letter are to review the current status of planning for a graded exercise of the Shoreham Emergency Plan and to stimulate the actual federal cooperation necessary to achieve progress toward conduct of such an exercise.

On November 14, 1984, LILCO wrote to the Nuclear Regulatory Commission pursuant to the NRC-FEMA Memorandum of Understanding, to request the NRC's good offices in undertaking, with FEMA, to plan for a graded emergency planning exercise for the Shoreham Offsite Emergency Plan. [Letter, Leonard (LILCO) to Denton (NRC) SNRC-1107] That letter stated that LILCO had prepared, and was offering to make available, three exercise scenarios which were being kept in the meantime under security restrictions by LILCO. It also attached a five-page set of proposed exercise objectives and a four-page table cross referencing those proposed objectives to standard FEMA exercise objectives. The letter proposed an exercise during the week of February 11, 1985, and asked the NRC to assist in setting up the necessary initial contacts with FEMA. A copy of that letter was also sent directly to Stewart Glass, Esg., counsel for FEMA, Region II.

On December 19, 1984, the NRC officially forwarded LILCO's letter to FEMA, along with various other comment letters from New York State and Suffolk County. [Letter, Jordan (NRC) to Krimm (FEMA)] The NRC's letter requested FEMA to take the lead in preliminary consideration of LILCO's request. Finally, on January 16, 1985, LILCO provided the NRC with its comments on the RAC review of Rev. 4 of the Shoreham Emergency Plan, as had been requested by the NRC on November 28, 1984. [Letter, Leonard (LILCO) to Denton (NRC), SNRC-1133]

For your convenience, I enclose duplicate copies of LILCO's November 14 and January 16 letters.

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Mr. Harold R. Denton, Director Page 2 February 8, 1985

A graded exercise no longer appears practicable during the week of February 11. However, LILCO is, and believes that it has been for some time, fully ready for a graded exercise of its Shoreham Emergency Plan. LILCO has also taken substantial steps to facilitate this goal. This can be seen from the following tabulation summarizing the pre-exercise milestones of FEMA Guidance Memorandum 17 (Rev. 1), with an indication of their current status at Shoreham.

POTENTIAL SHOREHAM EXERCISE SCHEDULE PER FEMA GUIDANCE MEMORANDUM 17 (REV. 1)

SHOREHAM

Action	Days before Exercise	Current Status
Licensee submission of exercise objectives to FEMA/NRC	120	Submitted 11/14/84
FEMA/NRC Completion of Review of exercise objectives	105	Unknown
Licensee submission of exercise scenario	90	In LILCO's posses- sion; Offered to FEMA 11/14/84
Table top exercise	Any time	Not yet done
FEMA/NRC meet with licensee	60	Not yet done
Controller's exercise coordination meeting	40	Not yet done
FEMA/NRC develop post- exercise schedule	30	Not yet done
FEMA/NRC meeting	15	Not yet done
Federal observers' meeting	1	Not yet done
Exercise	0	Not yet done

LONG ISLAND LIGHTING COMPANY

Mr. Harold R. Denton, Director Page 3 February 8, 1985

As you can see, LILCO has taken, more than two months ago, all of the actions that are within its sole control. If the NRC and FEMA have reviewed the exercise objectives submitted in November and have found them appropriate, and desire to commence review of the scenarios promptly, it still appears that an exercise in May might be practicable using FEMA's guidelines. However, progress at this point is in FEMA's, not LILCO's, control.

I would apprehiate your help in creating an opportunity for cognizant LILCO personnel to meet at the earliest possible date with their FEMA counterparts for a technical meeting on off-site matters including the possibility of a table top exercise in February. LILCO believes that it is ready and that all concerned would benefit from the opportunity to witness this fact.

Very truly yours,

alon And John D. Leonard, Vice President Nuclear Operations

JDL:MF

Enclosures

cc: Mr. Richard W. Krimm Assistant Associate Director Federal Emergency Management Agency



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION P.O. BOX 618, NORTH COUNTRY ROAD . WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR. VICE PRESIDENT - NUCLEAR OPERATIONS

November 14, 1984

SNRC-1107

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Exercise Objectives for Emergency Plan Exercise Shoreham Nuclear Power Station - Unit 1 Docket No. 50-322

Dear Mr. Denton:

Attached for your review and forwarding to he Federal Emergency Management Agency pursuant to the FEMA-NRC Aemorandum of Understanding dated as of November 1, 1984, 45 Fed. Reg. 02713 (1980), is a statement of objectives to be demonstrated at an exercise of the Shoreham Emergency Preparedness Plan and the Local Emergency Response Organization (LERO) Plan. This attachment is in two parts: first, a statement, in LILCO's terms, of the objectives of the exercise labeled "LERO Objectives", and second, a correlation of these objectives with the standard FEMA "Core Objectives." It is being submitted to you in order to support a graded exercise which LILCO is planning for the week of February 11, 1985. LILCO has also developed three potential scenarios for the exercise, which have been kept under security provisions. We would appreciate your transmitting this document promptly to FEMA and your good offices in arranging the preliminary meeting necessary to commence the detailed planning process for the exercises.

If you have any questions, please contact this office.

Very truly yours, 1 marie John D. Leonard, Jr. Vice President - Nuclear Operations RWG:ck Attachment cc: P. Eselgroth C. Petrone (FEMA Region II) Robert DeYoung (I&E) Edward Jordan (ISE) All Parties Listed in Attachment I

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Fabian G. Palomino, Esq. Special Counsel to the Governor Executive Chamber, Room 229 State Capitol Albany, NY 12224 Attachment I Page 2

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Ms. Nora Bredes Executive Coordinator Shoreham Opponents Coalition 195 East Main Street Smithtown, NY 11787 Gerald C. Crotty Counsel to the Governor Executive Chamber State Capitol Albany, NY 12224

Spence W. Perry, Esq. Associate General Counsel Federal Emergency Management Agency 500 C Street, SW Room 840 Washington, DC 10472

LILCO SHOREHAM/LERO PLAN

A. Emergency Response Facilities and Equipment

- Demonstrate the prompt activation, adequacy of the staffing and set up as appropriate of emergency response facilities as follows:
 - o Shoreham Nuclear Power Station Control Room
 - o Shoreham Nuclear Power Station Technical Support Center
 - o Shoreham Nuclear Power Station Operations Support Center
 - o Shoreham Nuclear Power Station Emergency Operations Facility
 - Local Emergency Response Organization Emergency Operations Center in Brentwood (LERO EOC)
 - Local Emergency Response Organization Staging Areas in Riverhead, Patchogue and Port Jefferson (LERO SA)
 - o Emergency News Center (ENC)
 - o Emergency Worker Decontamination Facility
- Demonstrate the Shoreham Nuclear Power Station communication capabilities among the Control Room, Technical Support Center, Emergency Operations Facility, Operations Support Center, and the Emergency News Center.
- Demonstrate the capability to communicate effectively between Shoreham Nuclear Power Station Emergency Response Organization and LERO.
- Demonstrate effective communications among the LERO EOC in Brentwood, and the various staging areas, the Emergency News Center, and among Staging Areas, Bus Transfer Points, Traffic Control Points and Field locations.
- Demonstrate the ability of the Shoreham Nuclear Power Station, and LERO communications to:
 - o Perform a 24-hour per day notification
 - o Transmit accurate and timely information
- Demonstrate the ability of the Shoreham Nuclear Power Station Emergency Response Organization and LERO to deploy, coordinate and control radiological monitoring teams.
- Demonstrate exposure control capabilities for onsite corrective action teams.
- 8. Demonstrate communication of technical information to the Nuclear Regulatory Commission via the NRC hotlines.

- Demonstrate the adequacy of internal communications within the Emergency Response Facilities as defined in A.1 above.
- Demonstrate adequacy of facilities and displays to support emergency operations.
- B. Notification and Mobilization of Key Personnel and Staff
 - Demonstrate the ability of the Shoreham Nuclear Power Station staff to properly classify actual or potential emergencies in accordance with LILCO Emergency Plan Implementing Procedures.
 - Demonstrate the capability of the Shoreham Nuclear Power Station Emergency Response Organization to notify the Local Emergency Response Organization (LERO) through the established notification system.
 - Demonstrate the capability of the Shoreham Nuclear Power Station Emergency Response Organization and LERO to notify emergency response personnel.
 - 4. Demonstrate the capability of the Shoreham Nuclear Power Station Emergency Response Organization and LERO to mobilize staff and activate the emergency response facilities in a timely manner and maintain staffing around the clock.
 - Demonstrate, as appropriate the ability to identify the need for, notify and request assistance from Federal agencies.
 - Demonstrate, as appropriate, the notification of and coordination with counties and states within the ingestion pathway EPZ and with agencies such as FEMA, NRC, DOE, Red Cross, Federal Aviation Administration, and Coast Guard.

C. Emergency Operations Management

- Demonstrate the capability of the Shoreham Nuclear Power Station Emergency Response Organization and LERO to implement their radiological emergency preparedness plans.
- Demonstrate the ability of key emergency personnel within the Shoreham Nuclear Power Station Emergency Response Organization and LERO to initiate, coordinate and implement timely and effective decisions during a radiological emergency and clearly demonstrate "who is in charge."

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- Demonstrate that there is effective organizational direction and control and integrated radiological emergency response including deployment of field monitors, acquisition, receipt and analysis of field data.
- Demonstrate the capability to coordinate actions (internally/ externally) among organizations in order to obtain support and to make appropriate decisions.
- 5. Demonstrate the capability of responsible personnel to recommend and/or implement appropriate protective actions.

D. Public Alerting and Notification

- Demonstrate that the Shoreham Nuclear Power Station (SNPS) Emergency Response Organization and LERO authorities can effectively provide accurate information to the public in a timely fashion.
- 2. Demonstrate the capability of LERO to activate the prompt notification system within 15 minutes of the decision to implement protective actions to simulate using sirens, EBS and tone alert radios. In addition, demonstrate the capability of LERO to implement route alerting and simulate the notification provided by the United States Coast Guard to boaters.
- Demonstrate the capability of the SNPS Emergency Response Organization and LERO to provide initial and follow up information to the public in a timely fashion.

E. Public and Media Relations

- 1. Demonstrate staffing of the Emergency News Center by Shoreham Nuclear Power Station Emergency Response Organization and LERO personnel and the capability to issue coordinated periodic public information releases.
- 2. Demonstrate ability to provide rumor control and responses to inquiries from the general public in a coordinated fashion.
- 3. Demonstrate the ability to provide clear, timely and accurate briefings to the news media and public relative to the emergency at the Shoreham Nuclear Power Station.

F. Accident Assessment

- 1. Demonstrate the ability of both the Shoreham Nuclear Power Station Emergency Response Organization and LERO to receive and assess radiological data.
- 2. Demonstrate the ability of Shoreham Nuclear Power Station Emergency Response Organization and LERO to respectively project and compary dose projections to the public via the plume exposure pathway, co pare their projections to the Protective Action Guides, available shelter, evacuation time estimates and determine appropriate protective action recommendations.

-3-

- 3. Demonstrate the ability of LERO to project doses to the public via the ingestion pathway and to determine appropriate protective measures based on PAG's and other relevant factors.
- 4. Demonstrate the activation, equipment and procedures of both the Shoreham Nuclear Power Station Emergency Response Organization and LERO field radiation monitoring teams.
- 5. Demonstrate the ability of in-plant personnel to safely draw and analyze post-accident liquid and gaseous samples.
- 6. Demonstrate equipment and procedures for measurement of airborne radioiodine concentrations as low as 10⁻ uCi/oc in the presence of noble gases.
- G. Actions to Protect the Public

- Demonstrate the implementation of appropriate protective action response options by LERO, including (all sheltering and evacuation to be simulated):
 - Sheltering and evacuation of offsite areas including schools and special facilities;
 - Informing the public on the development of the accident and any required protective actions;
 - Identification, notification and evacuation of non-institutionalized mobility-impaired persons;
 - Analyzing and determining ingestion exposure pathway considerations;
 - Provision for removal of impediments from evacuation routes;
 - Provision to guide traffic during a simulated evacuation;
 - Provision to evacuate members of the public without transportation;
 - Activation of Reception Center;
 - Coordination with the American Red Cross for the provision of Congregate Care Centers.
- Demonstrate the capability of emergency personnel to identify requirements, evaluate data and implement procedures for re-entry.
- Demonstrate the capability of emergency personnel to identify requirements, programs and policies governing recovery.
- Demonstrate ability to effect an orderly evacuation of protected area personnel (on site only).
- 5. Demonstrate adequacy of procedures for registration and radiological monitoring of evacuees (off site only).

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H. Health, Medical and Exposure Control Measures

- Demonstrate the decision making process for limiting exposure of emergency workers.
- Demonstrate processing of local emergency workers and vehicles through personnel monitoring and decontamination facility.
- Demonstrate the decision making process for recommending the use of Potassium Iodide for emergency workers.
- Demonstrate methods and resources for distributing dosimetry and thyroid blocking agents, if appropriate, to emergency workers.
- Demonstrate the record keeping of radiation exposure and use of dosimetry and thyroid blocking agents for the protection of emergency workers.
- Demonstrate knowledge, on the part of the emergency worker, of dosimetry and Potassium Iodide usage procedures and of the individual authorized to allow worker exposures above permissible limits.

	FEMA Core Objective*	LER0 Objective(s)
	Demonstrate ability to mobilize staff and activate facilities promptly.	B.4
2.	Demonstrate ability to fully staff facilities and maintain staffing around the clock.	A.1, B.4
3.	Demonstrate ability to make decisions and to coordinate emergency activities.	C.2
4.	Demonstrate adequacy of facilities and displays to support emergency operations.	A.10
5.	Demonstrate ability to communicate with all appropriate locations, organizations, and field personnel.	A.3,4,6
5.	Demonstrate ability to mobilize and deploy field monitoring teams in a timely fashion.	A.6
<i>.</i>	Demonstrate appropriate equipment and procedures for determining ambient radiation levels.	F.4
8.	Demonstrate appropriate equipment and procedures for measurement of airborne radiolodine concentrations as low as 10 ⁻⁷ uCi/CC in the presence of noble gases.	F.6

* Source - Modular Format for Uniformity of Radiological Emergency Preparedness Exercise Observations and Evaluations (June 1983) Attachment 2 to letter from Dave McLoughlin (Deputy Associate Director, State and Local Programs Support) to Regional Directors, Acting Regional Directors, Regions III, V; Concerning Procedural Policy on Radiological Emergency Preparedness Plan Reviews, Exercise Observations and Evaluations, and Interim Findings.

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	FEMA Core Objective	LERO Objective(s)
9.	Demonstrate appropriate equipment and procedures for collection, transport and analysis of samples of soil, vegetation, snow, water, and milk.	
10.	Demonstrate ability to project dosage to the public via plume exposure, based on plant and field data, and to determine appropriate protective measures based on PAG's, available shelter evacuation time estimates, and all other appropriate factors	F.2
11.	Demonstrate ability to project dosage to the public via ingestion pathway exposure based on field data, and to determine appropriate protective measures based on PAG's and other relevant factors.	F.3
12.	Demonstrate ability to implement protective action for ingestion pathway hazards.	
13.	Demonstrate ability to alert the public within the 10-mile EPZ, and disseminate an initial instructional message within 15 minutes.	D.2, 3
14.	Demonstrate ability to formulate and distribute appropriate instructions to the public in a timely fashion.	D.1, E.3, G.1
15.	Demonstrate the organizational ability and resources necessary to manage an orderly evacuation of all or part of the plume EPZ.	G.1

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	FEMA Core Objective	LER0 Objective(s)
16.	Demonstrate the organizational ability and resources necessary to deal with impediments to evacuation, such as inclement weather or traffic obstructions.	6.1
17.	Demonstrate the organizational ability and resources necessary to control access to an evacuated area.	
18.	Demonstrate the organizational ability and resources necessary to effect an orderly evacuation of mobility-impaired individuals within the plume EPZ.	G.1
19.	Demonstrate the organizational ability and resources necessary to effect an orderly evacuation of schools within the plume EPZ.	6.1
20.	Demonstrate ability to continuously monitor and control emergency worker exposure.	H.5, 6
21.	Demonstrate the ability to make the decision, based on predetermined criteria, whether to issue KI to emergency workers and /or the general population.	H.3
22.	Demonstrate the ability to supply and administer KI, once the decision has been made to do so.	H.4
23.	Demonstrate ability to effect an orderly evacuation of onsite personnel.	G.4
24.	Demonstrate ability to brief the media in a clear, accurate and timely manner.	E.3
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	FEMA Core Objective	LER0 Objective(s)
25.	Demonstrate ability to provide advance coordination of information released.	E.1
26.	Demonstrate ability to establish and operate rumor control in a coordinated fashion.	E.2
27.	Demonstrate adequacy of procedures for registration and radiological monitoring of evacuees.	G.5
28.	Demonstrate adequacy of facilities for mass care of evacuees.	
29.	Demonstrate adequate equipment and procedures for decontamination of emergency workers, equipment and vehicles.	H.2
30.	Demonstrate adequacy of ambulance facilities and pro- cedures for handling contaminated individuals.	
31.	Demonstrate adequacy of hospital facilities and procedures for handling contaminated individuals.	
32.	Demonstrate ability to identify need for, request, and obtain Federal assistance.	c.4
33.	Demonstrate ability to relocate to and operate the alternate EOF/EOC.	Nut applicable
34.	Demonstrate ability to estimate total population exposure.	
35.	Demonstrate ability to determine and implement appropriate measures for controlled recovery and reentry.	G.2, 3

Date: 11/9/84



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION P.O. BOX 615, NORTH COUNTRY ROAD + WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.

January 16, 1985

SNRC-1133

11.

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington DC, 20555

> FEMA Findings on LILCO Transition Plan for Shoreham Shoreham Nuclear Power Station - Unit 1 Docket No. 50-322

Dear Mr. Denton:

Your November 28, 1984 letter requests that LILCO review and inform the NRC by January 1, 1985 of its intended response to each of the eight inadequacies relative to NUREG-0654 criteria, and to the legal concerns, identified by the FEMA Regional Assistance Committee (RAC) in its review of Revision 4 to the LILCO Transition Plan for Shoreham.

Attachment 1 entitled "Summary of Response to Consolidated RAC Review of LILCO Transition Plan Rev. 4 for Shoreham: Items Graded Inadequate" summarized, for each of the eight listed deficiencies, its NUREG-0654 criterion number, the RAC comment, and LILCO's proposed resolution. These resolutions will be contained in the next revision to the Shoreham offsite emergency plan. No date has yet been set for issuance of that revision.

With respect to the RAC concerns involving LILCO's legal authority to implement its offsite emergency plan, they, or various aspects of them, are presently among the issues being raised in litigation before one Atomic Safety and Licensing Board in this case (Docket 50-322-OL-3 (Emergency Planning)), as well as in lawsuits pending before the United States District Court for the Eastern District of New York (Citizens for an Orderly Energy Policy, et al., v. Suffolk County, Docket No. 83-4966) and the New York Supreme Court, Suffolk County ((Cuomo, et al. v. LILCO, Consolidated Index No. 84-4615). LILCO's view on these issues -- namely,

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that it possesses the legal authority to implement all necessary aspects of the Transition Plan -- is set forth at length in pleadings before each of those bodies. Under present circumstances, further resolution of "legal authority" issues must abide the results of this litigation.

Very truly yours,

ORIGINAL SIGNED BY

John D. Leonard, Jr. Vice President Nuclear Operations

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Enclosure: As stated

cc: Mr. P. Eselgroth

bcc: Dr. M. C. Cordaro w/enclosure Messrs. A. Weismantle: C. A. Daverio B. Aidikoff D. P. Irwin LERO File

> J. W. Dye w/o enclosure J. D. Leonard " B. R. McCaffrey " Chairman NRB w/enclosure W. E. Steiger " J. L. Smith " L. F. Britt " R. A. Kubinak " A. F. Earley "

J. A. Scalice L. Klan J. G. Wynne E. J. Youngling D. Toner R. T. Misiaszek J. M. Kelly NOSD File

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ATTACHMENT

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SUMMARY OF RESPONSES TO CONSOLIDATED RAC REVIEW OF LILCO TRANSITION PLAN REV. 4 FOR SHOREHAM ITEMS GRADED INADEQUATE

Iten No.	MAC Comment
A.2b(1)	LILCO has indicated in their summary of responses to the consolidated RAC review for Revision 3 of the plan (see page 2 of 13), that this is a legal authority issue to be addressed elsewhere and there is no modification to Revision 4 of the plan. Therefore, the legal authorities/bases of the LERO plan are not yet defined and for this reason, the element has been rated inadequate.
A.3(1)	A determination of the overall adequacy of these ambulance and ambulette resources must await tabulation of the transportation needs of non-institutionalized mobility impaired (see example Invalid/Disabled Evacuation Listing, Zone Q, Procedure OPIP 3.6.5, Attachment 1).
A.3(2)	The letter of understanding with FAA should be a letter of agreement from the agency to LILCO (see Appendix B, B-54).
A.3(3)	There are no letters of agreement included in the LILCO Transition Plan with the facilities designated to serve as relocation centers. This element has been rated inadequate because the plan must contain letters of agreement with the facilities to be used for the monitoring and decontamination of evacuees.

Resolution

See cover letter

A copy of the confidential computerized Homebound Evacuation Listing will be available for FEMA's review during the upcoming FEMA/NRC observed excercise.

A letter of agreement with the FAA is being requested and will be included with the letters of Agreement, Appendix B. If the letter cannot be obtained, FAA support will be requested through FEMA under the auspices of the FRERP.

LILCO has arranged for the use of the Nassau County Veteran's Memorial Coliseum as a reception center. LILCO has obtained a letter of agreement from Hyatt Management to allow LERO to monitor and decontaminate evacuees at the facility. In addition, Nassau County has written a letter to Hyatt Management Corporation approving the use of the facility in case of a Shoreham emergency. These letters are enclosed in Attachment 2.

Page 1

SUMMARY OF RESPONSES TO CONSULIDATED RAC REVIEW . OF LILCO TRANSITION PLAN REV. 4 FOR SHOREHAM ITEMS GRADED INADEQUATE

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Iten No.

C.4(1) The letters of agreement with facilities to be used as relocation centers are missing. This element has been rated inadequate because the plan must contain letters of agreement with the facilities to be used for the monitoring and decontamination of evacuees. Also see analysis comments for element A.3.

1.7(1) It should be noted that the LERO radiological procedures are still included in the plan. These procedures apparently remain from Revision 3 wherein LERO was to provide field teams if needed. In Revision 4, there is no plan to use LERO personnel since DOE-RAP will perform field monitoring functions; therefore, the LERO radiological procedures should be deleted from the plan.

1.7(2) Page 7 in Procedure OPIP 3.5.1 has not been changed in Revision 4. The plan at page 3.5-2a, lines 3-6, states that laboratory analysis can be performed. The potential problem alluded to in line 3 of page 3.5-2a (i.e., the calculation of thyroid dose from the iodine samples taken in the field) has not been addressed by my changes in the operating procedures set forth in Procedure OPIP 3.5.1, which should provide for expedited laboratory analysis. Resolution

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See element A.3(3). In addition, a letter of Agreement with the Nassau County Red Cross has been obtained, is enclosed in Attachment 2. This letter identifies the Congregate Care Centers that will be activated in Nassau County to shelter evacuees. While a small number of facilities listed are operated by New York State, the remaining facilities provide more than enough capacity for the number of evacuees expected to require shelter assistance.

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OPIP 3.5.1, Downwind Surveying, will be removed from the procedures. Support organizations providing this service will use their own procedures.

OPIP 3.5.2 will be revised to state that the survey team will, if instructed by the RAP Team Captain to expedite return of samples, proceed directly to the DOE-RAP headquarters prior to going to the Emergency Worker Decontamination Facility.

Page 2

SUMMARY OF RESPONSES TO CONSOLIDATED RAC REVIEW . OF LILCO TRANSITION PLAN REV. 4 FOR SHOREHAM ITEMS GRADED INADEQUATE

RAC Comment

Itam No.

Although LILOD's summary of the consolidated 1.9(1) RAC review comments for Revision 3 stated that expedited laboratory analysis will be made, the Procedure (OPIP 3.5.2, Section 3.3) does not include provisions for expediting this analysis. Further, Procedure OPIP 3.5.1 does not call for an expedited return of these samples to the laboratory. In fact, the discrepancies about where the location of the Environmental Survey Function, discussed in the comment for element I.8, is also of concern here. The instructions in Procedure OPIP 3.5.1 are to be returned to the Emergency Worker Decontamination Center at the local EOC where they will be transferred to the Environmental Survey Function and taken into the EOC for further analysis. The plan should be revised to clarify that sample media will be taken to Brookhaven National Laboratory for analysis.

1.9(2) Attachments 5 and 6 of Procedure OPIP 3.5.2 have been removed and incorporated into a computerized procedure. The RAC comments for Revision 3 of the plan with regard to the nomogram are still valid. The assumptions used in the computerized approach may not be realistic. Section 3.3 of OPIP 3.5.2 will be modified to provide for expedited return of field samples to Brookhaven National Laboratory for analysis. See also item 1.7(2).

Resolution

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The RAC concerns identified in the Rev. 3 review about OPIP 3.5.2 Attachments 5 and 6 were that the heading of the tables should be 'changed to read, multiply results by 10E-6' When these values were transferred to the computer memory they were inputted with the correct units. The RAC concerns on the use of the nonogram for calculation of thyroid dose using the TCS air sampler were addressed in Rev. 4.

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SUMMARY OF RESPONSES TO CONSOLIDATED RAC REVIEW OF LILCO TRANSITION PLAN REV. 4 FOR SHOREHAM ITEMS GRADED INADEQUATE

Iten No.

RAC Comment

1.10(1) As noted above in the discussion for element I.9. inclusion of the required information in a computerized procedure may not be adequate, since the previous revision of the plan did not contain the required noncograms, and in the current revision this information has been incorporated into a computer program. LERO anticipates that DOE-RAP will carry out dose assessment computations and, therefore, the LERC computerized methodology may not be necessary. FEMA will evaluate the capability to obtain accurate dose assessment calculations during an exercise of off-site radiological evergency preparedness. The current version of the plan does not contain a method for semual calculation of dose. A procedure for menual calculation was contained in Revision 3 of the plan in the event of computer malfunction. It appears that Revision 4 addresses a problem by removing the affected pages of the plan not necessarily by correcting the problem. If LERO decides to retain their procedure described in the plan, documentation of the computer program should be provided to FEMA for review.

J.9(1) The FDA Emergency PAGs for ingestion are for projected doses of 5 rem whole body and 15 rem to the thyroid; not 25 rem thyroid as stated in the plan. Also the interpretation of how to use the response level tables (i.e., instructions contained in the footnotes) has been incorrectly transcribed from the Federal Register referenced in the plan. In addition, page 3.6-2 lines 46 and 47, should state "5" nuclides, and include Cs-134. Resolution

The DOE-RAP Team uses the IRDAM dose assessment model on a portable Osborne Computer. The development of this dose assessment model was sponsored by the NRC and published in NUREG/CR-3012. LERO uses the ACCDOS dose assessment model described in OPIP 3.5.2, on an HP-85b portable computer. This model is mathematically the same that was previously included in the manual calculation method of Rev. 3. The information previously needed to complete the missing nomograms has been developed and included in the computerized software. Both of these systems may be used in the EOC which has a back-up power supply. LILCO feels that the availability of two independent proven and reliable dose assessment systems precludes the necessity of having a manual backup.

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The Plan will be revised to reference the correct FDA PAGs and Cs-134 has been added to the list of nuclides evaluated. The discussion in the Plan will also be revised to correctly quote the Federal Register.

Page 4

OF LILCO TRANSITION PLAN REV. 4 FOR SHOREHAM

Item No.

RAC Comment

LILCO relies on local snow removal organizations J.10.K(1) who may be accompanied by LERO personnel who will provide dosimetry to ensure that untrained workers do not receive doses in excess of PAGs for the general public (see comment for element A.1.b). the need to coordinate pre-emergency planning for snow removal along evacuation routes is greater in this particular case. This is espectally true in view of the fact that since resources may be limited, there is a need to ensure that these resources would be used in an effective manner where sheltering may not be recommended. For example, it would be advisable to ensure that efforts are concentrated on keeping evacuation arteries rather than side streets, driveways, etc. clear. The plan is not clear as to how LERO could coordinate snow removal by normal response functions in the event, however unlikely, they would be needed during an emergency (see pages 2.2-4g and h of the plan). Therefore pre-emergency planning for snow removal on the evacuation routes should be further developed to include administrative procedures, SOPs, etc. These procedures are recommended to ensure that the snow removal strategy would coincide with any evacuation scheme that might be chosen.

Resolution

LILCO has identified the roads having the highest levels of traffic flow and will add them as an attachment to the procedure. The Brookhaven and Riverhead Townships, Suffolk County and New York State Department of Public Works will be notified of these road priorities in case of an evacuation during or immediately following a snowfall.

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ATTACHMENT



LONG ISLAND LIGHTING COMPANY

EXECUTIVE OFFICES 250 OLD COUNTRY ROAD . MINEOLA, NEW YORK 11501

September 25, 1984

22.

Mr. E. B. Sumerlin, Jr. General Manager Nassau Veterans Memorial Coliseum Hyatt Management Corporation of N.Y., Inc. c/o Nassau Coliseum Uniondale, NY 11553

Dear Sir:

LETTER OF AGREEMENT FOR USE OF NASSAU VETERANS MEMORIAL COLISEUM BY LONG ISLAND LIGHTING COMPANY

This letter confirms our recent discussions regarding the use of Nassau Veterans Memorial Coliseum by Long Island Lighting Company (LILCO) as a reception center during a radiological emergency at the Shoreham Nuclear Power Station.

Use of Facility. Hyatt Maragement Corporation of New York, Inc., the lessee of the Nassau Veterans Memorial Coliseum, agrees to allow LILCO to use the Coliseum, consisting of the Nassau Veterans Memorial Coliseum building and all parking lots and immediately surrounding property, as a reception center for the general public in planning for and responding to a radiological emergency at Shorehom, pursuant to the Local Offsite Radiological Emergency Response Plan (LILCO Plan) developed by LILCO. LILCO's use of the Coliseum pursuant to the LILCO Plan shall include the following activities:

1. Identifying the Coliseum, in the LILCO Plan and brochures and other information distributed to the public, as a reception center for joint use by LILCO and the American Red Cross in the event of a radiological emergency at Shoreham, where (1) LILCO will register, monitor decontaminate (if necessary), and is: 'clean tags' to evacuees, and (2) the Red Cross will provide information and assistance to evacuees as required.

2. Performing radiological monitor and decontamination, if necessary, in the Coliseum and/or surry g property in the event of a radiological emergency at Shoreham, inc. ding using showers in the building and waterworks on the property for decontamination.

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Mr. E. B. Sumerlin, Jr. September 25, 1984 Page 2

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3. Developing layouts and implementing procedures for use of the Coliseum, in cooperation with Nassau County employees to allow LILCO to develop these items expeditiously.

4. Identifying, in cooperation with Coliseum employees, an area in which to store any necessary amounts of equipment and supplies on the property at the facility, and storing such equipment and supplies upon reasonable terms to be agreed to by the parties.

Access. LILCO will be given interfere with the normal operation of the Coliseum.

Expenses. LILCO will be responsible for any expenses (1) incurred in the development of plans for use of the Coliseum, and (2) in using the Coliseum for planning, drills, exercises, or an emergency response. LILCO will reimburse Nassau County and/or Hyatt, as appropriate, for any expenses incurred by them in connection with such activities.

Insurance and Indemnity. LILCO will be liable for all damage to the Coliseum, normal wear and tear excepted, as a result of LILCO's use of the Coliseum pursuant to this Letter of Agreement, and LILCO will indemnify and hold the County and Hyatt harmless from any claims or suits arising out of injury or death to any person or damage to property resulting from LILCO's use of the Coliseum pursuant to this Letter of Agreement. For all contractual and noncontractual non-nuclear liability arising out of either (1) the training of emergency response members or (2) response to a simulated or actual radiological emergency at Shoreham, LILCO will furnish a statement of self-insurance and/or an appropriate certificate of insurance showing that there is in effect, and will remain in effect throughout the term of this agreement, comprehensive general liability insurance, including property damage, in the following amounts:

Comprehensive General Liability (Including Personal Injury and Contractual Liability) - \$1,000,000.

Bodily Injury (aach occurrence) - \$1,000,000.

Property Damage (each occurrence) - \$300,000.

LILCO will name, as additional insured, Hyatt Management Corporation of New York, Inc., its officers, directors, agents, and employees, and the County of Massau and its cognizant officials, as their interests may appear. Within 10 days after the signing of this Letter of Agreement by the County and Hyatt, LILCO will deliver to Hyatt and the County certificates of insurance or evidence of self-insurance with the limits specified above, evidencing that the policies or self-insurance required from LILCO are in full force and effect.

APP-B-12A

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Mr. E. B. Sumerlin, Jr. September 25, 1984 Page 3

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If you find that this Letter of Agreement accurately represents our understanding regarding LILCO's use of the Coliseum during an emergency at Shoreham, please sign the Letter below and return it to me. Thank you very much for allowing us to use the Coliseum in our efforts to aid the public in the unlikely event that an emergency were to occur at Shoreham.

Very truly yours,

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Dr. William J. Catacosinos Chairman of the Board and Chief Executive Officer Long Island Lighting Company

HYATT MANAGEMENT CORPORA YON OF NEW YORK, INC.

DATE: 10/8/84

APP-B-12B



COLOTY SECONAL

NASSAU COLISEUM

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24.

OFFICE OF THE EXECUTIVE NASSAU COUNTY EXE. UTIVE BUILDING ONE WEST STREET MINEOLA. N. Y. 11501

October 1, 1984

Mr. E.B. Sumerlin, Jr. Vice President/General Manager Nassau Veterans Memorial Coliseum Hyatt Management Corporation of New York, Inc. Uniondale, New York 11553

Dear Mr. Sumerlin:

This letter will confirm discussions between members of my staff with you and officials of the Long Island Lighting Company regarding the use of the Nassau Veterans Memorial Coliseum as a reception center for the public in the event of a radiological emergency at the Shoreham Nuclear Power Station.

I am aware of and approve the use of the Coliseum as a reception center for members of the public requiring assistance from the Local Emergency Response Organization and/or the American Red Cross as a result of any accident at Shoreham which results in the recommendation that the public evacuate from part or all of the Emergency Planning Zone around Shoreham. Included will be:

- The identification in public information of the Coliseum as the reception center,
- b. The use of the Coliseum for performing radiological monitoring and decontamination as necessary, and
- c. Cooperation with LILCO in planning, training and exercises as well as in the event of an accident.

APP-B-24



RANCH T. PURCELL

Mr. E. B. Sumerlin, Jr. Page 2

October 1, 1984

I want to assure you that in the event of an emergency at Shoreham, as at all times, the Nassau County Police Department will be prepared to protect the public welfare of all those in Nassau County. The Department will, therefore, be available to provide assistance with security at the Coliseum, and to facilitate traffic flow and parking at the Coliseum and its approaches.

I hope that an agreement can be reached promptly with the Nassau County Chapter of the American Red Cross to formalize their relationship with the Coliseum for its use by the Red Cross during any emergency, including a radiological accident at Shoreham.

PP-B-24A

Very truly yours

Francis T. Purcell County Executive

FTP:ser

cc: Dr. William J. Catacosinos Long Island Lighting Company Mr. Frank Resbury American Red Cross



LONG ISLAND LIGHTING COMPANY

178 EAST OLD COUNTRY ROAD . HICKSVILLE, NEW YORK 11801

ATTHEW & CORDANG, PA B.

October 23, 1984

13.

Mr. Frank M. Rasbury Executive Director American Red Cross Nassau County Chapter 264 Old Country Road Mineola, New York 11501

Letter of Agreement for Use of Nassau Veterans Memorial Coliseum by American Red Cross

Dear Mr. Rasbury:

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As you know, Long Island Lighting Company has entered into an agreement with Hyatt Management Corporation for the use of the Nassau Veterans Memorial Coliseum (Coliseum) as a reception center pursuant to the Local Offsite Radiological Emergency Response Plan (LILCO Plan) developed by LILCO. A copy of that agreement, dated September 25, 1984, is attached to this letter. The purpose of this letter is to set out our understanding regarding LILCO's and the American Red Cross' use of the Coliseum as a reception center pursuant to the LILCO Plan.

LILCO will identify the Nassau Veterans Memorial Coliseum in the LILCO Plan, brochures, and other information distributed to the Red Cross in the event of a radiological emergency at Shoreham, where 1) the Local Emergency Response Organization (LERO) will register, monitor, decontaminate (if necessary), and issue "clean tags" to evacuees, and 2) the American Red Cross will provide information and assistance to evacuees as required. The American Red Cross will provide Red Cross staff to assist evacuees and to direct evacuees to congregate care centers operated by the Red Cross, chosen from among those on the list provided with the Letter of Agreement between Long Island Lighting Company and the American Red Cross dated July 25, 1984.

Red Cross Staff at the Nassau Coliseum will coordinate with LERO monitoring and decontamination personnel to define a "clean" area from which the Red Cross will operate at the Coliseum; evacuees will be monitored and, if accessary, decontaminated by LERO personnel prior to being directed to Red Cross staff members at the Coliseum. American Red Cross staff at congregate care centers will be trained to send any evacuee who has not been monitored (should any find his way to a congregate care center without first going to the Coliseum) back to the Coliseum for monitoring prior to accepting him into Mr. Frank M. Rasbury

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the congregate care centers. The location of specific congregate care centers will not be included in public information materials; all evacuees will be directed to go to the Coliseum.

If you find that this letter accurately represents our understanding regarding the American Red Cross' use with LILCO of the Nassau Veterans Memorial Coliseum during an emergency at Shoreham, please sign the letter below and return it to me. Thank you very much for your continued efforts to provide aid to the public in the unlikely event that an emergency were to occur at Shoreham.

Very truly yours,

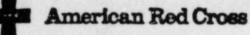
Marthen C. Cordan

Matthew C. Cordaro, Ph.D. Vice President

Executive Director American Red Cross Nassau County Chapter

DATED: October 24. 1984

APP-B-11A



Name County Chapter 264 Old Country Road Mineola, N.Y. 11501 (516) 747-3500

11.

July 25, 1984

Mrs. Elaine D. Robinson Long Island Lighting Company 100 East Old Country Road Hicksville, N.Y. 11801

> Re: Letter of Agreement Between LILCO and the American Red Cross

Dear Mrs. Robinson:

This letter confirms our recent discussions regarding the role of the American Red Cross, as determined by Charter of the U. S. Congress, during an emergency at the Shoreham Nuclear Power Station. Upon notification of an emergency at Shoreham the Red Cross will set up emergency centers at a predesignated facility (or facilities) to be listed in the LILCO Transition Plan. The Red Cross will work with LILCO to identify the facility or facilites to be designated; any facility chosen will be 20 miles or more from the Shoreham site. The Red Cross will staff the designated facilities and will, if necessary, dispatch evacues from these to additional facilities for shelter. It is agreed that the Local Emergency Response Organization (LERO) will provide monitoring and, if necessary, decontamination at the designated facilities.

In addition, there exist agreements between the Nassau County Chapter of the American Red Cross and the facilities named on the attached list, allowing the Red Cross to use the facilities for shelter during an emergency. These facilities will be relied upon by the Red Cross to provide additional space as reincation centers in the event of a radiological emergency at Shoreham, and it is to these facilities that evacuees would be directed, if necessary from the designated facilities in the LILCO Plan. If the space in these facilities is meeded during an emergency at Shoreham, the Red Cross would fulfill its usual emergency response functions at these facilities, including staffing them and providing supplies as meeded. It is estimated that these facilities could hold up to 48,000 people. All facilities are 20 miles or more from the Shoreham Nuclear Power Station.



The Hazani County Red Cross is also afflieted with Garden City Community Fund. * Great Neck United Community Fund Inc., Five Towns United Wey. Manhasses United Fund, Inc.

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Mrs. Elaine Robinson Long Island Lighting Company 100 East Old Country Road Hicksville, New York 11801

Page 2.

LILCO has agreed to provide any training the Red Cross may require. Red Cross personnel will participate as appropriate in emergency planning drills and exercises to assure a successful response in an actual emergency.

Sincerely, M. Part Frank M. Rasbury Executive Director

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APP-B-10A

SHELTER INFORMATION 1982-1903

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264 OLD COUNTRY ROAD MINEOLA, NY 11501

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1975 500		iontact:	223_8100 ext. 207/208
3976	Bellmore-Herrick Central B.S. Dist. -1691 Headowbrook Road Merrick, B.Y. 11566		Hr. Ellinger 623-8900
1976 .	Carle Flace Union Free School Carle Flace, M.Y. 11514		George Boyhl 334-1900 ext. 224
1978 ·	East Kendow Union Free School Dist. Carman Ave. East Kendow, New York 11554		Claude Stringham Mr. Campo 794-7000 ext. 206
1978	East Rocksway Public Schools East Rocksway S.S. Ocean Ave. East Rocksway, N.Y. 11518	:	Edvard Lattare 599-7589 Robert Norse 599-7589
1981 900	East Williston School District 110 E. Williston Ave. East Williston, N.Y. 11596		334-8020
1978 1400	Elmont Public Schools Elmont Road Elmont, B.Y. 11003		354-4917
1975 1500	Farmingdale Public Schools Van Cott & Grant Ave. Farmingdale, N.T. 11735		752-6512 249-7680
1981 400	Floral-Park-Bellrose Union Free School D 1 Poppy Flace Floral Park, S.T. 11001	ist.	Mr. Russell 352-0768
1981 : 600	Franklin Square Union Free School Dist. Mashington Street Franklin Square, S.Y. 11010		George Reymolds 354-1045
1976	Freeport Public Schools 235 Borth Ocean Ave. Freeport, N.Y. 21520		Robert Banson 623-2100
1980	Garden City Public Schools Garden City, B.T. 11530	• •	Mr. Boisisch 248_7700
1978	Glan Cove Public Schouls Doénnis Lane Glas Cove, H.T. 11542	۰.	Anthony Prisziolo 671-3272

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Contact: 741_7800

Segricks Public Schools 1975 Shelter Rock Road Hew Hyde Park, H. Y. 11040 Herlett High School 1981 60 Everit Ave. 1400 Sm/lett, H.Y. 11557 2 Emfett_Woodagre Union Free School Dist. 1974 1 Johnson Place 800 Mooda are; H.Y. 11598 Bicksville Public Schools 1975 Division Ave. Sieksville, N.T. 11801 1950 Island Park Schools Island Park, N.T. 11558 400 Island Trees Union Free School Dist. Ow Place & Confor Road 1975 Levittown, M. T. 11756 Lawrence Jr. L.S. 1975 Lawrence, H.Y. 300 Locust Valley Central School 1975 Locust Valley, M.T. 11560 1400 Long Beach H.S. 1981 Lido Blvd, & Allevard Street 800 Long Beach, M.I. Lynnbrook Union Free School Dist. 1974 Waverly Ave. 1000 East Rookaway, H.T. 11518 Massapequa Grace Spiscopal Church 1378 4750 Herrick Boad 200 Massapaque, N.Y. 11758 Massapeque High School 1975 4925 Herrick Road 1300 Nasmpequa, B.T. 21958 Malverno U.F.S.D. 1980 bedi jald Road 900 Reciville Contre, N.T. 11570

1975 Kanha soot Public Schools 300 Nemerial Flace Sanha soot, N.X. 21030 Fred BePalma 374-5200 . Gus Bruno

Harry Richter 374-5200 ext. 213

733_2100 Kathleen Kogan

432_8933

Mr. Fred Neist 731-4020 Stells Clark 731-7247

Berton Thorp 295_2700 ext. 283/253

de.

James Difionanal Richard Smith 676-8430

Villias Soldan 889_2410 Larry Bourger 889_2167

Louis Pearsall LY 3.4861

Father John Jobson 798-1122

Villian A. Eldard 541-6600

Lavrence Chapman 887-7733

Dr. Oren 2111 627.4400 Dr. Donald Grote 627.4400

APP-B-10C

1978 300	Hincola Town Rall Jerioho Turnpike Mincola, N.Y. 21501	Contact:	Fayor Saith 747-2232
1978 1600	Mineola Union Free School Dist. 200 Empry Road Mineola, H.X. 11501		747_6700
1981 1000	Massau County B.O.C.E.S. Salisbury Conter Valentines Rd. & The Flain Rd. Westbury, M.I. 11590		997-8700
1975	No. Bellmore U.F.S.D. 2616 Martin Ave. No. Bellmore, N.Y. 11710	•	221_2200
1978	North Nurrick U.F.S.D. 1775 Old Mill Road No. Nurrick, N.Y. 11566		379-4070
1980	Forth Shore Schools Ses Cliff, N.I.	:	671-5500
1982 500	Oceanside Nerle Ave. School Nerle Ave. Oceanside, N.Y. 11572		678_1200
1978 1200	Oyster Bay-East Morvich School Dist. Oyster Bay, H.Y. 11771		\$2-3170
1981 1600	Flainedge Public Schools Bickville Road Bothpage, H.Y. 21714	•	Norman Black 735-8100 ext, '304
1978	Plainview.Old Bothpage Central School Flainview, N.Y. 11803		938-5400
3978	Fort Machington U.F.S.D. 27 Longview Road Fort Mashington, N.T. 21050		Earold Champol 886-2517 Francis Banta 883-4000
- 1978	Roosevelt Public Schools 258 Messau Road - Roosevelt, S.T.		378-7302
3961	Boslyn Publis Schools Locust Lane Boslyn, New York		622-4900
1961. 300	St. Ignatious Rectory 229 Broadway Bicksville, B.T. 11801		Father Harrer 931-0056

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3600	Seaford Union Free School Dist. 2147 Jackson Ave. Seaford, N.Y. 11783
1976 500	Sovanhalm Central H.S. Dist. 555 Ridge Bd. Elmont, B.I. 11003
1975	Sycsset Central School Dist. Pell Lane Sycsset, N.Y. 21791
1978	Uniondale Public Schools Goodrich Street Uniondale, M.T. 11553
*2978 350	United Methodist Church 40 Mashington Street Bempstead, N.Y. 11550
7 1978	United Nethodist Church 192 Broadway Bethpage, N.T. 11714
1975	Valley Stream U.P.S.D. Corona Ave. Valley Stream, N.Y. 11580
1980	Valley Stream U.F.S.D. #30 Valley Stream, M.T. 11580
1978 1600	Westbury U.F.S.D. Jericho Tpks. & Hitchsock Lane Westbury, S.I. 11590
1975	West Hempstend U.F.S.D. 450 Hassau Blvd. W. Hempstend, N.T. 21552
1981	VESTBURT CAMPUS SURT GLD VESTRURY N.T
14.F4 500	Ferningdule (SUNY) Rossert H Hall Farmingdule, NY 11735
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Joseph Singleton 921-5500

485-9804

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Rev. George Caar

George Hilton WE 1.4345 WE 1.2977

825-8545

Dos Cierro -483-3969

Elwood Webster . 876_2016

Barry Hatow 489_8435

AUCERDA R. FTRAFSKI 516 876 5146 M. 516 433 5459 40 Bus VC.XX

John Coyne Art V.P. or security shead

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