

551.

~~RELATED CORRESPONDENCE~~

SUFFOLK COUNTY
NEW YORK STATE
2/11/85

DOCKETED
USARC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

FEB 12 A10:28

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

SUFFOLK COUNTY AND NEW YORK STATE
JOINT MOTION TO STRIKE ADDITIONAL STAFF TESTIMONY

Suffolk County and the State of New York hereby move to strike one additional portion of the joint testimony of Spencer H. Bush, Adam J. Henriksen and Professor Arthur Sarsten; namely the second to the last sentence on Page 32 which reads "FaAA has conducted such an analysis (FaAA-84-9-11.1, December 1984)." The testimony is outside the scope of the forthcoming hearing because it represents more new testimony on the adequacy of the EDGs under the FSAR load requirements of 3500/3900 kW and not LILCO's new proposed "qualified load" of 3300 kW.^{1/}

^{1/} The County and State have found it necessary to file two earlier motions dated January 22 and February 8, 1985, to strike testimony of LILCO and the Staff for the same reason. The testimony here in question falls within the scope of and could have been included in the February 8 motion but is still timely.

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The testimony in question is presented by Dr. Bush in support of his opinion that the cylinder blocks of EDGs 101 and 102 are adequate under LILCO's new proposed qualified load of 3300 kW. However, the three-dimensional finite element analysis referred to is expressed in terms of evaluating the adequacy of the cylinder blocks under the existing FSAR load requirements of 3500/3900 kW, not in terms of LILCO's new proposed qualified load of 3300 kW. It is pertinent that the testimony is contained in FaAA's most recent cylinder block report, which was not made available to the parties until after the record of the recently concluded hearings concerning adequacy of the cylinder blocks under the existing FSAR 3500/3900 load requirements was closed. Although FaAA witnesses made fleeting references to a three-dimensional finite element analysis during those hearings, that testimony was not remotely as detailed as the material in the December 1984 block report relied upon by Dr. Bush.

In summary, the testimony in question is outside the scope of the forthcoming hearing and should be excluded for the reasons discussed in the two earlier motions filed by the County and

State to strike testimony of LILCO and the Staff pre-filed for
introduction at the forthcoming hearing.

Respectfully submitted,

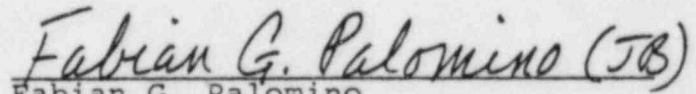
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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY AND NEW YORK STATE JOINT MOTION TO STRIKE ADDITIONAL STAFF TESTIMONY, dated February 11, 1985, have been served to the following this 11th day of February 1985 by U.S. mail, first class, except as otherwise indicated.

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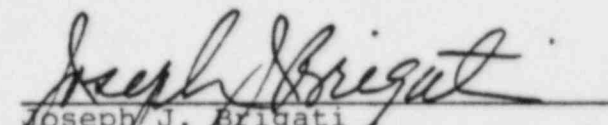
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DATE: February 11, 1985

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