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LILCO, February 26, 1985

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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

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

LILCO'S RESPONSE TO INTERVENORS'
PROFFERED TESTIMONY ON THE DESIGNATION
OF NASSAU COLISEUM AS A RECEPTION CENTER

Pursuant to the Board's January 28, 1985 Order granting LILCO's motion to reopen the record to identify Nassau Veterans Memorial Coliseum as the reception center for Shoreham, LILCO responds in this pleading^{1/} to the testimony submitted by New York State and Suffolk County under cover letter dated February 19, 1985. For the reasons stated below, the Interveners' testimony should not be admitted into the record, and does not establish the need for further hearings on the adequacy of the Nassau Coliseum as a reception center.

^{1/} Attached to this Response is an unsigned Affidavit of John A. Weismantle. Mr. Weismantle has reviewed it and will execute it today or tomorrow, after which an executed copy will be promptly served. Mr. Lieberman is likewise executing his affidavit today. LILCO apologizes for this procedure, made necessary by the logistic difficulties of getting documents between Richmond, Washington, D.C., and Long Island.

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I. THE INTERVENORS HAVE NOT ANSWERED THE BOARD'S THREE QUESTIONS

In the Board's January 28, 1985 Order granting LILCO's motion to reopen the record, the Board invited the parties to "state specifically their positions concerning LILCO's evidence," as follows:

- 1) Do the parties question the authenticity of LILCO's documents? If so, set forth with particularity the reasons for such a challenge and the evidence such party intends to offer to challenge the authenticity of the documents.
- 2) If a party asserts a need to cross-examine LILCO's witness on the substance of the designation of the Nassau Veterans Memorial Coliseum as a relocation center, such party shall state the questions to be asked and the substance of what is expected to be proved by such interrogation.
- 3) If a party asserts a need to submit direct testimony or other evidence on the merits of LILCO's designation of the Coliseum as a relocation center, such party shall submit copies of all such documents and narrative testimony or an affidavit of any witness whose testimony is said to be necessary.

The Intervenor's February 19 filing does not address at all the question of the authenticity of LILCO's documents. The questions to be asked on the substance of the expected responses was not provided to LILCO so that LILCO could respond. And the testimony proffered by the Intervenor's in many instances does

not go to the merits of LILCO's designation of the Coliseum and in addition raises issues outside the limited purpose for which the Board reopened the record.

As to the Board's first question, the Intervenors' February 19 filing does not address the authenticity of LILCO's documents. LILCO assumes, then, that those documents are unchallenged. They therefore should be admitted into the record as proposed by LILCO on January 11, 1985.

As to the Board's second question, it appears from the cover letter accompanying the Intervenors' proffered testimony that Suffolk County and New York State have simply submitted to the Licensing Board cross-examination plans such as were used during previous hearings on emergency planning. This is not what appears to have been contemplated by the Board's January 28, 1985 Order, since the provision (on page 10 of the Order) for LILCO to respond to the other parties' submissions is meaningless insofar as LILCO has not been provided those submissions. The submission of cross-examination plans only to the Board does not appear to LILCO to comply with the Board's Order and denies LILCO the opportunity to respond.

As to each piece of direct testimony, the evidence solicited by the Board in its January 28 Order was for the limited purpose of addressing "the merits of LILCO's designation of the Coliseum." In large measure the testimony

submitted by the Intervenors does not meet this criterion. While Suffolk County represents in its cover letter that the testimony "is responsive to LILCO's proffered evidence of January 11 and is also within the scope of the relocation center contentions previously admitted and litigated before the Board, i.e., Contentions 24.0, 24.P, 74, 75, and 77," February 19 letter from Suffolk County counsel at 2, n.3, the Intervenors' testimony in fact raises new issues outside the scope of the limited purpose for which the Board reopened the record. And the Intervenors have made no effort to meet the reopening standards or to raise new contentions. The testimony, therefore, should be rejected.

Specific objections to each piece of testimony proffered by the Intervenors follow.

II. RESPONSES TO TESTIMONY

A. Response to the Testimony of Leon Campo

Suffolk County has not demonstrated that a public hearing is necessary due to Mr. Campo's testimony because (1) Mr. Campo's testimony is outside the scope of the Board's limited inquiry concerning Nassau Veterans Memorial Coliseum and (2) taken as testimony on congregate care centers,^{2/} it is grossly

^{2/} Evacuees come first to the central "relocation center," where they are monitored by LERO and directed by the Red Cross

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out of time.

1. The Testimony Is Irrelevant To The Board's Present Inquiry

In reopening the record, the Board is allowing the parties "to submit direct testimony or other evidence on the merits of LILCO's designation of the Coliseum," February 12 Board Order at 3. Mr. Campo's testimony provides no evidence whatsoever on the merits of the use of the Nassau Veterans Memorial Coliseum as a reception center for Shoreham. Instead, Mr. Campo's testimony is about congregate care centers, not the proposed reception center. Mr. Campo's testimony purports to "respond to LILCO's proffered evidence of January 11, 1985," Campo Testimony at 1, by focusing on one phrase in a letter attached to LILCO's January 11 submittal on the Nassau Coliseum, in which LILCO notes that Red Cross personnel will "direct evacuees to congregate care centers operated by the Red Cross," Campo Testimony at 2. That letter describes briefly, for the purposes of the agreement between the Red Cross and LILCO, the duties of the Red Cross during an emergency at Shoreham. It

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to "congregate care centers," where they are fed and housed. The term "relocation center" was used when these two functions were combined in single facilities; it is a term best avoided now so as to prevent confusion.

does not provide a basis for reopening the entire relocation center issue for Shoreham.

2. The Testimony on Relocation Centers Is Untimely

Mr. Campo's testimony discusses the previously litigated issues of the availability of East Meadow Union Free School District buildings to shelter Shoreham evacuees, and the meaning of the agreement between the school district and the Red Cross. Suffolk County has made no effort whatsoever to meet the reopening standard in submitting this proffered testimony. In fact, the testimony is grossly out of time.

While Mr. Campo states that he learned about the proposal by the Red Cross and LILCO "only recently," Campo Testimony at 2, the list of relocation centers used by the Nassau County Red Cross was provided to all parties in July 1984, and copies of each individual agreement with those entities, one of which Mr. Campo now seeks to enter into the record, were provided to Suffolk County in August 1984. See Tr. 14,764-67. Thus, the information regarding the use of the East Meadow Union Free School District by the American Red Cross has been available for about seven months. Mr. Campo was a proffered witness in this proceeding as early as 1983, and so cannot argue that he was unaware of the issues surrounding the emergency plan at Shoreham.^{3/} No good cause has been established to show why,

^{3/} In fact LILCO deposed Mr. Campo in connection with his proffered testimony on January 5, 1984; his testimony was

seven months later, Mr. Campo's understanding of the meaning of the agreements and the alleged availability of his school district buildings should now be relitigated.

In addition, the issue of the availability of the buildings relied upon by the American Red Cross was litigated in August 1984 as part of the relocation center issues. Frank Rasbury, Director of the Nassau County Chapter of the American Red Cross, testified that the agreements with the individual entities relied upon varied as to the wording of "natural disasters," "disasters," or "emergencies," but that it was his understanding as a result of discussions and ongoing contacts with each of these entities that the buildings offered to the American Red Cross for use in a communitywide emergency are available for any kind of emergency, whether people are seeking shelter due to a hurricane, a chemical spill, the Grucci fireworks explosion, or any other calamity. Tr. 14,760-62, 14,771-72 (Rasbury); see Tr. 14,740 (Rasbury) ("We get people to make the facilities available to us on a broad spectrum, which includes the Shoreham circumstance, certainly, but is not limited to and is not specific only to.") While the agreements

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entered into the record on January 25, 1984, ff. Tr. 3087, but he was unable to attend the hearings, and the County withdrew his testimony.

were provided to Suffolk County during the litigation of the relocation center issues, the Intervenor's never sought to enter them into the record, or to present their own evidence regarding the meaning of the agreements.^{4/} See Tr. 14,764-74.

Finally, Mr. Campo's testimony provides little in the way of probative evidence regarding relocation centers for Shoreham. While he testifies that in his view the school district agreement with the Red Cross does not provide assurance that buildings would be available, he does not assert that the East Meadow Union Free School District would refuse to shelter people in the event of an emergency.^{5/} On the contrary, Mr.

^{4/} LILCO's view then, as now, is that the individual agreements between the Red Cross and the relocation centers on which it relies are a level of detail that is unnecessary for this Board to scrutinize agreement by agreement. FEMA testified that LILCO's agreement with the Red Cross providing that the Red Cross will furnish relocation centers during an emergency at Shoreham is all that need be included in the LILCO Plan; while FEMA would like to have on file at its headquarters the individual agreements between the Red Cross and owners of buildings to be used as relocation centers, there is no need to include the individual agreements in the LILCO Plan. Tr. 14,611-13, 14,572-74, 14,611-15 (McIntire, Kowieski, Keller). In addition, FEMA witnesses testified that, in their view, it is an accepted fact that the Red Cross provides relocation centers and cares for people in an emergency. Tr. 12,989 (Keller). Suffolk County witnesses conceded that "it is [not] inappropriate for LILCO to rely on the American Red Cross because the American Red Cross has a good record in dealing with all sorts of natural disasters." Tr. 14,878 (Harris).

^{5/} Indeed, there is no good reason why a designated congregate care center would treat people needing shelter from a

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Rasbury testified that, during the last major communitywide disaster on Long Island (a hurricane), no agreements were in place and yet school districts and many others responded admirably to house the homeless. Cordaro, et al., ff. Tr. 14,707, at 17; Tr. 14,815 (Rasbury). Mr. Rasbury explained that as an added measure of planning following the hurricane experience, the Red Cross sought agreements with various school districts, but that past experience showed people would respond whether or not agreements existed. Tr. 14,860 (Rasbury). He also testified that the agreements are updated periodically, that persons from his office are in contact with representatives of the various entities relied upon, and that, because no radiation monitoring or decontamination would take place at these buildings, he is treating the use of the buildings for relocation centers for Shoreham as he would treat them for any other emergency. Tr. 14,774-80 (Rasbury). Thus, the

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radiological disaster differently from people seeking shelter from a flood or hurricane, since the evacuees would be monitored, and decontaminated if necessary, elsewhere. The only bases for treating a Shoreham emergency as distinct are the political one, mentioned in paragraph 3 of Attachment 2 to Mr. Campo's testimony (which basis, as the record reflects, can be expected to evaporate when real people are in real need) and the misconception, which appears to be reflected in paragraph 4 of Attachment 2, that the congregate care centers would be used for monitoring and decontamination.

record is clear that even without agreements, the Red Cross would provide shelter for those needing it during an emergency.^{6/} Nothing in Mr. Campo's testimony sheds any light to the contrary.

In short, Mr. Campo's testimony does not address the designation of Nassau Coliseum as a reception center; good cause has not been established to reopen the record on congregate care centers; and even were reopening timely, which it is not, Mr. Campo's testimony presents no probative evidence that would further the record on this issue.

B. Response to Testimony of James H. Johnson, Jr

Dr. Johnson's testimony does not raise any issue that would require a public hearing on the adequacy of the Nassau Coliseum as a reception center.

First, Dr. Johnson states in his testimony that the location of the reception center from the Shoreham plant "is likely to increase in the minds of the public the degree of the perceived danger." Johnson Testimony at 4. The Intervenors have known since last July that all relocation centers and any

^{6/} As the December 31, 1984, letter from the Nassau County Executive to LILCO's Chairman shows, the Nassau County government would cooperate in making facilities available to aid evacuees. This in itself provides substantial assurance that facilities would be available as needed.

reception center that might be established were to be in Nassau, not Suffolk County. See Cordaro, et al., ff. Tr. 14,707, at 20-22. If the location of these centers from the source of the emergency is a generic concern to the Intervenor, they should have raised that concern last summer, either in connection with the congregate care centers, or with the then-undesignated reception center, because the County knew that those centers were to be in Nassau County, and the Nassau County border is 30 miles from the Shoreham Nuclear Power Station. Thus, the argument, now raised in Dr. Johnson's testimony, that the "shadow phenomenon" will increase due to the location of the reception center is untimely.

In addition, the issue of the perceived distance from the source of danger as it affects emergency response was litigated at length in this proceeding. See, e.g., Zeigler and Johnson, ff. Tr. 2789, at 3-4, 8-9, and Figures 1-4; Tr. 2866-67 (Cole); Tr. 1994-99 (Dynes); Tr. 2878-79 (Zeigler). The issue of how public perception is affected by emergency information was also litigated at length. See, e.g., Cordaro, et al., ff. Tr. 1470, at 26-41, 45; Tr. 2069 (Mileti); Zeigler and Johnson, et al., ff. Tr. 2789, at 35-38; Tr. 2884-85, 2892-93 (Johnson, J.); Tr. 2888, 2891-92 (Zeigler). Consequently, Dr. Johnson is simply rehashing old "shadow phenomenon" ground that this Board reviewed previously in six days of hearings, involving 18 witnesses and resulting in 826 pages of transcript.

To the extent that Dr. Johnson is being proffered by Suffolk County to assert his opinion that "establishing the place of safe refuge so far from the origin of the danger -- the Shoreham Plant -- is likely to increase in the minds of the public the degree of the perceived danger," Johnson Testimony at 4, his testimony is not probative because he has offered no basis for this assertion. Expert witnesses can give all kinds of opinions, but their opinions are only as good as the basis upon which the opinions rest. As the Board said in Consumers Power Co. (Big Rock Point Plant), LBP-82-77, 16 NRC 1096, 1101 (1982):

While we accept Mr. Bement as an honest and truthful witness, we are not persuaded when Mr. Bement offers overall assessments not accompanied by an explanation of his reasons.

See also Virginia Elec. & Power Co. (North Anna Power Station, Units 1 & 2), ALAB-555, 10 NRC 23, 26-27 (1979) (expert on the stand must have at hand enough underlying information to provide for reasonable probing of the ultimate opinions given). Dr. Johnson has asserted no new evidence, literature, or studies to support his hypothesis that a reception center more than forty miles from the source of the emergency "is likely to increase in the minds of the public the degree of the perceived danger."

The record has already been developed regarding the appropriateness of having relocation and reception centers farther out from Shoreham than those originally designated in Suffolk County. FEMA witnesses testified that they were not troubled by reception centers farther away from nuclear plants, and consider the distance of these centers on a case-by-case basis. Tr. 14,575-77 14,615-25 (Keller, Kowieski, McIntire). In response to recent informal discovery requests by Suffolk County, FEMA provided to Suffolk County a list of 34 licensed plants (attached to this Response) that have 442 reception and congregate care centers 30 to 40 miles and farther from the plant sites. This information is not included in the proffered testimony by Suffolk County.

In short, Dr. Johnson's thesis that reception and relocation centers in Nassau County are unacceptable under NUREG-0654 due to their distance is untimely. In addition, his testimony offers no probative information on that issue, and therefore should be rejected.

C. Response to the Testimony of Edward P. Radford

The crux of Dr. Radford's testimony is that "the dose one receives during a radiological accident is a function not only of the "severity" of the release, i.e., the amount of radioactive materials released in an accident, but also of the

time one is exposed to such radioactive materials." Radford Testimony at 4. LILCO does not dispute this basic principle. It was implicit in Dr. Radford's discussion on the record of health effects, see, e.g., Tr. 12,338 (Radford), and in LILCO's witnesses' discussion of dose assessment, see, e.g., Cordaro, et al., ff. Tr. 8760, at 30-40; Cordaro, et al., ff. Tr. 13,909, at 8. But Dr. Radford's testimony offers no data to support the assertion that the result of this general principle is that the Nassau Coliseum cannot be used as a reception center.^{7/} Likewise, his hypothesis that it "may take many hours to reach the coliseum and begin the monitoring and decontamination process," Radford Testimony at 4, is based on the testimony of others (Roberts and Kilduff). He offers no evidence to bolster that opinion, and he is not a traffic expert qualified to give it. He offers no data in support of his hypothesis that use of the Nassau Coliseum may result in "an incremental increase in adverse health effects." Consequently, his testimony will not advance the record on the issue of the use of the Nassau Coliseum.

^{7/} Indeed, as we point out below in the response to Ms. Meyland's testimony, NUREG-0396 and NUREG-0654 do not contemplate that licensing boards will entertain detailed issues about how decontamination of the public will take place.

The second point Dr. Radford raises in his testimony, beginning on page 5, is that LILCO may not be able to monitor and decontaminate the number of persons who may require it in an emergency at Shoreham. The issue of LILCO's monitoring and decontamination has already been litigated. See, e.g., 24-25; Cordaro, et al., ff. Tr. 14,707, at 15-16, 24-25; Tr. 14,712-714, 14,807, 14,825-30, 14,854 (Weismantle); Tr. 14,878-82, 14,888 (Harris); see also LILCO Plan OPIP 3.9.2; Contention 77 (thyroid monitoring equipment). Mr. Radford's concern is untimely and should have been raised during the litigation of these issues previously. In addition, he gives no basis for his statement that LILCO cannot provide adequate monitoring and decontamination of the public. His testimony is untimely.

D. Response to the Testimony of Richard Roberts and Charles E. Kilduff

The testimony of Deputy Chief Inspector Richard C. Roberts and Charles E. Kilduff seeks to raise a spectrum of issues about alleged traffic problems resulting from the use of the Nassau Coliseum as a decontamination facility. Generally, this testimony does little more than talismanically recite themes that were litigated in the traffic-related contentions (Contentions 23, 65, 66, and 67). Accordingly, the testimony is untimely and does not justify a public hearing before this

Board. In addition, no effort is made in either piece of testimony to identify any requirement in NUREG-0654 that dictates consideration and planning for traffic flow beyond the boundaries of the 10-mile EPZ. Indeed, no such requirement exists. This testimony represents but another attempt to expand planning boundaries beyond the 10-mile EPZ. This Board has refused to grant this request in the past, Special Prehearing Conference Order, at 8-1⁷ (August 19, 1984) (order denied admission of contentions that had as their basis an expansion of the 10-mile emergency planning zone), and it should now do so again.

Briefly, Inspector Roberts' testimony focuses largely on alleged congestion and delays that will result in reaching the Nassau Coliseum (pages 3 to 8). In addition, he argues that no provision is made for traffic guides, fuel trucks, and tow trucks outside the EPZ along major routes to the Coliseum (page 8) and that the Coliseum's parking capacity is insufficient to handle expected demand (page 8). Mr. Kilduff's testimony makes similar arguments, although packaged in the vernacular of earlier New York State witnesses.^{8/} Mr. Kilduff argues generally that congestion and delays will be encountered by evacuees

^{8/} See, e.g., Direct Testimony of Dr. David T. Hartgen, Richard D. Albertin, Robert G. Knighton and Foster Beach on Contention 65, ff. Tr. 3695.

attempting to reach the Coliseum. As bases for this argument, Mr. Kilduff cites limited roadway capacities impacted in part by "side friction" (pages 3 to 6), intersection design deficiencies which have a propensity to increase accident rates (page 5), and future construction activities which may affect some routes to the Coliseum (pages 5 and 8). Of these factual assertions, only Inspector Roberts' claim about the adequacy of the parking facilities at the Nassau Coliseum is germane to the issues reopened on Contention 24.0, and as will be demonstrated below, this claim is factually meritless. The remaining issues are general concerns about traffic congestion, accidents, construction, and the effect of voluntary evacuation from areas outside the 10-mile EPZ that have already been litigated in Contentions 23 and 65, and additional hearings are not required on these issues.^{9/}

Even if accepted as germane to Contention 24.0, these two pieces of testimony must fail for a number of reasons. First,

^{9/} This response will not attempt to address in factual detail the myriad of traffic-related issues raised in Inspector Roberts' and Mr. Kilduff's testimony concerning roadway conditions around the Nassau Coliseum. Suffice it to say that a study performed by a LILCO consultant showed that the Coliseum parking lot and surrounding streets were clear of traffic within approximately 45 minutes following the end of a sold-out New York Islanders hockey game. Affidavit of Elaine D. Robinson at 3, attached to LILCO's January 11, 1985 Motion to Reopen Record.

the vast majority of Inspector Roberts' and Mr. Kilduff's arguments are untimely. Concerns about traffic conditions on Long Island that would be encountered by evacuees traveling to relocation centers were never raised by either Suffolk County and New York State in earlier proceedings. Yet those issues are largely generic to any relocation center located on Long Island.^{10/} Thus, this testimony must be rejected as untimely.

Second, Intervenors have cited no basis in NUREG-0654 for the consideration of traffic conditions outside the EPZ. Indeed, Appendix 4 to NUREG-0654 only addresses traffic planning within the 10-mile EPZ. The only NUREG-0654 guideline which even peripherally includes traffic conditions outside a 10-mile EPZ simply provides that:

. . . personnel and equipment available should be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

NUREG-0654, II.J.12. Yet, even if one accepts the driving times contained in Inspector Roberts' testimony as accurate,^{11/}

^{10/} For example, SUNY-Farmingdale, which was an earlier relocation center, is located about 13 miles from the Nassau Coliseum. Claims about congestion on the Long Island Expressway and Northern States Parkway apply equally to SUNY Farmingdale. In addition, it can hardly be claimed, and is not by Messrs. Roberts or Kilduff, that the additional 13 miles to the Coliseum create unique problems which trigger the need for this testimony.

^{11/} While LILCO has doubts about the representativeness of those travel times, LILCO will not burden the Board with a dis-

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the two-hour maximum driving time to the Coliseum comprises but a small percentage of the 12-hour monitoring time specified in NUREG-0654, II.J.12, and indeed, Intervenor's have not attempted to link travel times to the Coliseum with NUREG-0654 monitoring requirements.

Third, a majority of Inspector Roberts' and Mr. Kilduff's arguments are factually flawed because they proceed from an unsupported assumption -- namely that all EPZ evacuees will seek to travel to the reception center (Roberts, page 2; Kilduff, page 2). The capacity of relocation centers, and hence, the number of evacuees expected to report to those facilities, was the subject of discussion in Contention 75. There, LILCO witnesses testified without refutation that no more than 20% of the population of 10-mile EPZ would seek shelter in relocation centers. See LILCO Proposed Findings, ¶ 529. Intervenor's implicit attempt to relitigate this issue at this late date should not be permitted.

Finally, with regard to the one factual issue that arguably relates to the Nassau Coliseum's suitability as a decontamination facility, Inspector Roberts merely asserts,

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discussion of factual details that are irrelevant to the issues reopened by this Board.

with little explanation, that the available parking facilities are inadequate (page 8). Again, this conclusion is premised on the faulty assumption that all EPZ residents will report to the Nassau Coliseum for decontamination. As the attached affidavit of Edward B. Lieberman clearly indicates, if correct assumptions are made about the number of evacuees likely to use the Coliseum, then it must be concluded that sufficient parking exists to accommodate that demand.

Thus, the testimony of Inspector Roberts and Mr. Kilduff fails to raise issues which justify a hearing before this Board, let alone a conclusion that the Nassau Coliseum is unsuitable as a decontamination facility.

E. Response to the Testimony of Langdon Marsh

1. The SEQRA Issue Is Not a Litigable Issue

The testimony of Langdon Marsh (pages 3-9) asserts, in part, that Nassau County has failed to prepare an environmental assessment, pursuant to ECL § 8-0109(2) of the New York State Environmental Quality Review Act (SEQRA), for the use of the Nassau Coliseum as a relocation center. Mr. Marsh's testimony does not justify a public hearing before this Board, let alone a finding that LILCO's plan is inadequate. First, this testimony, like other pieces of Suffolk County's and New York

State's testimony, is untimely. The issue of compliance with SEQRA is the same at any facility designated as a relocation center, yet this issue was never raised before by Intervenors. Second, Mr. Marsh's "testimony" is unsupported by the plain language of the statute and regulations on which it purports to rely. Finally, the issue of compliance with SEQRA is a matter for New York State agencies and state courts. It is unrelated to the question of whether NRC emergency regulations have been met.

a. SEQRA Does Not Require Nassau County to Prepare an Environmental Assessment

Mr. Marsh's testimony on Nassau Coliseum's compliance with SEQRA is essentially devoid of factual assertions. Indeed, the only arguable facts contained in that testimony are that Nassau County has not submitted a negative declaration to the New York State Department of Environmental Conservation (page 5) nor has it submitted a written statement based on a federal environmental impact statement (page 6). The remainder of Mr. Marsh's "testimony" is legal opinion that is not proper testimony and does not trigger the need for hearings before this Board.

Even if accepted as proper testimony, Mr. Marsh's analysis of SEQRA is legally flawed. Mr. Marsh's reasoning begins

with the threshold statement that SEQRA requires an environmental impact statement for any action that state agencies, including counties, "propose or approve which may have a significant effect on the environment" (page 3). What Mr. Marsh neglects ;is that certain actions are exempted from SEQRA. See 6 NYCRR §§ 617.2(n); 617.13(a); 617.16. For those actions, no SEQRA findings are required. 6 NYCRR §§ 617.13(a); 617.16(d).

Nassau County's approval of the use of the Nassau Coliseum as a decontamination facility is exempted from the SEQRA requirements on three grounds. First, the regulations exempt "actions which are immediately necessary on a limited emergency basis for the protection or preservation of life, health, property or natural resources." 6 NYCRR § 617.2(n)(6). Definitionally, the Nassau Coliseum would only be used as a decontamination facility on a limited emergency basis. Hence, its use for this purpose is exempt from the requirements of SEQRA.

Second, the implementing regulations contain a list of "Type II" governmental actions, 6 NYCRR § 617.13, that have been generically "determined not to have a significant effect on the environment" and "do not require environmental impact statements or any other determination or procedure" under the SEQRA regulations, 6 NYCRR § 617.13(a). These actions include "minor temporary uses of land having negligible or no permanent

effect on the environment," 6 NYCRR § 617.13(d)(19) -- a description that clearly applies to the use of the Nassau Coliseum as a relocation center.

Third, both the state enabling statute (ECL §§ 8-0111(1) and (2)) and the implementing regulations (6 NYCRR § 617.16) recognize that if a federal EIS has been prepared, separate compliance with the SEQRA is not required. Mr. Marsh recognizes this exemption; however, he argues that the NRC's Shoreham EIS does not address the Shoreham evacuation plan and because of this omission, Nassau County needs to prepare a separate environmental determination under SEQRA. This strained interpretation of the NRC's Shoreham EIS and New York State's regulations is untenable. The Shoreham EIS, like EIS's for other nuclear power plants, does not include the consideration of "Class 9" accidents that give rise to offsite radiation doses and hence, the need for emergency plans. This omission is by no means an accident or oversight. Instead, Class 9 accidents are excluded because they are too speculative and remote to require consideration in an EIS. Indeed, NRC's categorical exclusion of these accidents has been upheld in Carolina Environmental Study Group v. U.S., 510 F.2d 796, 798-800 (D.C. Cir. 1975) and most recently in Deukmejian v. NRC, No. 81-2034 (D.C. Cir. Dec. 31, 1984) (CEQ worst case regulations do not require the supplementation of EIS's to include

discussions of Class 9 accidents). Similarly, the SEQRA regulations only require the consideration of "environmental impacts which can be reasonably anticipated," 6 NYCRR § 617.14(c) -- a standard which is identical to the "reasonably foreseeable" standard used by the D.C. Circuit to judge, and approve, the EIS's in Carolina Environmental Study Group and Deukmejian. Thus, the NRC's EIS for Shoreham encompasses the environmental effects of accidents that would give rise to offsite emergency response; a separate Nassua County assessment of the use of the Nassau Coliseum as a decontamination facility is unnecessary and not required by law.

b. Compliance with SEQRA Is Not
an Issue Within the Purview
of This Board

Even if compliance with SEQRA were required, it would be solely a matter for New York State agencies to pursue. Compliance with the SEQRA is not a matter cognizable within this licensing proceeding. No NRC regulation and no guideline in NUREG-0654 requires an applicant to demonstrate that a relocation center has complied with all state laws and local ordinances. Indeed, compliance with SEQRA is a matter of form rather than substance. Like the National Environmental Policy Act, SEQRA does not require environmental impacts to be given determinative effect. 6 NYCRR § 617.1(d). Thus, SEQRA is a

procedural statute which requires the disclosure of environmental effects; discussion of compliance with that statute serves no purpose in an NRC licensing proceeding.

Moreover, New York State's actions indicate that their primary interest in this issue is to delay further a decision in the emergency planning proceedings. New York courts clearly have authority to review Nassau County's alleged noncompliance with SEQRA. Typically, review of a governmental agency's compliance with SEQRA is subject to a four-month period of limitations. CPLR § 217; see also Ecology Action v. Van Cort, 417 N.Y.S. 2d 165, 169 (Sup. Ct. 1979). This four-month period runs from the time of the final permitting action by the appropriate governmental body. See Town of Yorktown v. N.Y.S. Dept. of Mental Hygiene, 459 N.Y.S.2d 891, 892 (App. Div.) aff'd 466 N.Y.S.2d 965, 453 N.E.2d 1254 (N.Y. 1983). Here, Nassau County approved the use of the Nassau Coliseum as a decontamination facility on October 1, 1984. More than four months have passed since that event, yet New York State has never sought review of Nassau County's alleged non-compliance with SEQRA in state courts. Such an action is now time barred. New York State's attempt to avoid this time bar by raising the issue of compliance with SEQRA before this Board should not be permitted.

2. The Issue of an SPDES Permit Is Not Properly Before this Board

Pages 9-10 of Mr. Marsh's testimony, like the whole of Ms. Meyland's (see below), attempts to raise a new issue about water pollution. In particular, Mr. Marsh raises the purely legal issue of whether the Coliseum must get a New York State permit (SPDES permit) to discharge the wash water after people and vehicles have been decontaminated.

Assuming, for the purpose of this Response, that Mr. Marsh is correct that an SPDES permit is required by state law, there are two reasons why Mr. Marsh's testimony at pages 9-10 does not justify the need for a public hearing, let alone a finding that LILCO's plan is inadequate. The two reasons are (1) that this issue would be precisely the same for any relocation center designated by LILCO, and yet the Intervenors did not raise it for any of the previously designated relocation centers, and (2) that this is a matter to be pursued exclusively by New York State agencies and has absolutely nothing to do with meeting NRC emergency planning regulations.

a. The Issue of an SPDES Permit Is Untimely

First, LILCO has in the past designated a number of other relocation centers before finally settling on the Nassau Coliseum. In particular, the following were the relocation centers named in Revisions 0-3 of the LILCO Plan:

Suffolk County Community College (primary)
SUNY-Stony Brook (primary)
BOCES Islip Occupational Center (primary)
SUNY-Farmingdale (secondary)
Saint Joseph's College (Patchogue) (secondary)

In all the many months that these other relocation centers were designated, the Intervenors never made the slightest mention of SPDES permits. Clearly this issue is not raised by any of the existing contentions; the only contention about monitoring and decontamination at the relocation center is Contention 77, which simply challenges the choice of the instrument used for monitoring. And if the Intervenors are now proposing to raise a new contention, they have failed to meet or even to address the standards for admitting late-filed contentions.

In short, the issue of a state water discharge permit for the monitoring and decontamination site is one that could -- and should -- have been raised before, if the Intervenors wanted to raise it. It is not an issue raised by the designation of Nassau Coliseum, because it would be the same issue no matter where the reception center were located.

b. The SPDES Permit is a Matter Entirely
Outside NRC Regulations

Second, assuming an SPDES permit is required, it is entirely a matter for New York State agencies to pursue, if they think it important. The issue of whether a permit is required, whether it must be applied for now or at the time of

an accident, and what its terms ought to be are all matters of state law.^{12/}

By the same token, the issue of the SPDES permit is not a matter cognizable within this NRC licensing proceeding. There is no NRC regulation and no guideline in NUREG-0654 that requires an applicant to show that the relocation center has complied with all state laws, local ordinances, etc.^{13/} And there is no other reason for the Board to engage questions of state law. As another licensing board observed in a similar situation:

22. Intervenors raise as an issue whether the Office of the Governor is legally empowered to exercise the command and control responsibilities assigned to it under the South Carolina plan. In effect Intervenors are requesting us to legally interpret the State Constitution and a South Carolina statute to determine if the

^{12/} Indeed, the testimony invites the Board to rule on such matters of state law as whether runoff from a parking lot is an "outlet or point source" within the meaning of ECL § 17-0803 and § 17-0105. LILCO believes that no relocation center for any other nuclear plant in New York State has been required to apply for an SPDES permit (see the Affidavit of John A. Weismantle, attached to this Response), and this throws substantial doubt on Mr. Marsh's interpretation of the law. While the question of whether or not an SPDES permit is required is largely or entirely a legal one and might well be resolved by summary disposition, there is simply no reason under NRC regulations for the Board to engage it at all.

^{13/} There is also no suggestion in Mr. Marsh's testimony that the existence or nonexistence of an SPDES permit would materially affect the public health and safety. That point is raised by Ms. Meyland's testimony, which we deal with below.

Office of the Governor is acting lawfully. That is not our function nor is it necessary for deciding the emergency planning issue at hand. Section II.A.2.b. of NUREG-0654 only requires that the plan contain, by reference to specific acts, codes or statutes, the legal basis for such authorities. No legal interpretations by this Commission are called for. There is a presumption that State officials are carrying out their duties in a proper and lawful manner. If Intervenors question that, they should seek a more appropriate forum than this licensing proceeding. We conclude on the record before us that the Office of the Governor can exercise the command and control responsibilities assigned to it under the South Carolina plan.

Duke Power Co. (Catawba Nuclear Station, Units 1 & 2), LBP-84-37, 20 NRC 933, 967-68 (1984).

In short, the Marsh testimony is deficient both because it is outside existing contentions (and because a new contention has not been proffered or justified) and because it is outside NRC regulations. Either would be sufficient reason for paying it no further attention.

F. Response to Testimony of Sarah J. Meyland

The testimony of Sarah J. Meyland is a nonspecific, nonquantitative catalog of fears about how contaminated wash water from decontaminating cars or people might "conceivably" (page 8) find its way into the drinking water on Long Island. (She adds, at page 10 of her testimony, that "the impact of radiologically contaminated urine and feces from evacuees should

not be overlooked," because the radiation might interfere with the bacteria necessary for sewage treatment.) Ms. Meyland's testimony does not require a public hearing, or show a deficiency in LILCO's Plan, for three reasons:

- (1) The testimony is untimely; it raises an issue that could have been raised with respect to other relocation centers designated earlier, all of which are over the same aquifer, and three of which are in primary recharge areas for the aquifer.
- (2) The testimony raises essentially an issue about monitoring water supplies after a radiological accident that should have been raised when the 50-mile EPZ issues were still open for litigation; alternatively it is an issue addressing only one of the environmental impacts of a serious radiological accident, and the environmental impacts of Class 9 accidents are not litigable for the reasons set out above in the discussion of Mr. Marsh's testimony.
- (3) The testimony raises an issue that are outside the scope of this proceeding, because NRC regulations and guidelines require no particular decontamination measures for the general public, and, indeed, NUREG-0396

provides that extraordinary measures need not be taken.

1. The Issues Raised are Untimely

The issue of discharge of wash water from the decontamination facility could have been raised long ago, when relocation centers were first designated in the plan. Clearly the same issue could have been raised with respect to those other, earlier relocation centers. As Ms. Meyland's testimony indicates (page 3), there is a single principal aquifer for all of Long Island. Moreover, as the attached Affidavit of John A. Weismantle indicates, three of the relocation centers originally designated by LILCO are located in primary recharge areas for this aquifer. Yet this issue is not included in any of the existing contentions, and the Intervenors have not attempted to meet the standards for submitting late contentions. It is therefore improperly raised at this time.

2. The Issue Was Litigated in the 50-Mile EPZ Contentions

It is obvious that if there were an accident at Shoreham severe enough to contaminate members of the general public so that they had to be decontaminated, radioactive material would be spread over the ground, trees, buildings, etc. of some portion of the EPZ. This material would be washed into streams,

rivers, storm drains, and ultimately the groundwater during the first rain after the accident. And it is equally obvious that the amount of radiation in the wash water used for decontamination would be small compared to the contamination that would be spread generally over the landscape.

These indisputable facts raise two objections to the Meyland testimony. In the first place, the testimony is essentially a complaint about a portion of the environmental impact of a serious radiological accident. It has nothing to do with the emergency planning regulations, and, as noted above, the environmental impacts of Class 9 accidents are not litigated in NRC proceedings. In the second place, the concerns expressed in the Meyland testimony were already addressed in the litigation of the contentions about the 50-mile ingestion pathway EPZ. The contamination of water, food, and land by the radiation from an accident is dealt with in the planning for the 50-mile EPZ, and the issue of decontamination wash water should have been raised under the contentions that the Intervenors submitted on the 50-mile EPZ. See Contentions 81, 85, and 88.^{14/}

^{14/} In particular, Ms. Meyland's concern about contaminated feces and urine (page 10) is off base. The purpose of planning for the 50-mile EPZ is to prevent people from ingesting radioactive materials, and it is unlikely evacuees would ingest radioactivity before they got to the Coliseum.

Since Contention 81.C very specifically raises the issue of how wash water from washing contaminated fruits and vegetables is to be disposed of, it is quite evident that the Intervenors thought of decontaminating foodstuffs but failed to think of decontaminating people and cars. Indeed, concerns of the type expressed in Ms. Meyland's testimony were addressed in LILCO's testimony. For example:

Contaminated fruits and vegetables may be washed or scrubbed in an ordinary kitchen sink. Radioactive particulates that are washed down the drain would be so diluted by the water purification process as not to pose a potential public health problem. The average American household, for example, uses 50-100 gallons of water per day.

Washing fruits and vegetables to eliminate radioactive contamination is no different from washing them to remove other toxic residues. In both cases, the contamination is significantly diluted by the wash water, which is further diluted by sewer water or septic systems. By the same token, peelings and other residue should be disposed of as any other garbage would, in a trash receptacle or other container. In short, there is no need for the Plan to have specific procedures governing the disposal of radioactive wash water and residue.

Cordaro, et al., ff. Tr. 13,563, at 21-22. Similarly,

Contention 81.D.1 is premised on the assumption that the greater portion of the drinking water supply for residents of the 50-mile EPZ would be susceptible to radioactive contamination in the event of an accident. This premise is faulty.

Wells provide the only source of drinking water for residents of Nassau and Suffolk Counties. Because of the natural filtration process that occurs when surface water enters the aquifer, it is extremely unlikely that a release of radioactive material from a nuclear plant would cause the contamination of well water supplies. Therefore, it is highly unlikely that residents of Nassau and Suffolk Counties (which represent approximately 80% of the New York portion of the 50-mile EPZ) would ever be in need of "alternative drinking water supplies."

Id. 26-27. This same testimony goes on to describe the monitoring of wells that would be done in the aftermath of an accident at Shoreham. In short, there is no excuse for the Intervenor's not having presented Ms. Meyland's testimony earlier.

3. The Testimony is Irrelevant to NRC Regulations

Finally, Ms. Meyland's testimony is irrelevant to the meaning of NRC regulations and even the guidelines of NUREG-0654, for the following reason. The emergency planning regulations do not require particular provisions for decontaminating the general public. NUREG-0654 Standard K provides for decontamination of "emergency personnel wounds, supplies, instruments and equipment" (K.5.6) and "relocated onsite personnel" (K.7). Criterion J.12 provides for registering and "monitoring" (but not decontaminating) evacuees at relocation

centers. More telling still, NUREG-0396 at page 14 provides that no special decontamination provisions for the general public need be provided:

The EPZ guidance does not change the requirements for emergency planning, it only sets bounds on the planning problem. The Task Force does not recommend that massive emergency preparedness programs be established around all nuclear power stations. The following examples are given to further clarify the Task Force guidance on EPZs:

No special local decontamination provisions for the general public (e.g., blankets, changes of clothing, food, special showers)

.

(Emphasis in original.) This is why licensing boards have not required specific decontamination materials, methods, schedules, etc. for the public. For example, in Shearon Harris 1 & 2, the licensing board refused to admit a contention insofar as it questioned the availability of materials for evacuee decontamination:

The ERPs do not give, and are not called upon by regulation or guidance to give, an accounting of materials available for evacuee decontamination. Indeed, neither regulations nor guidance even mention [sic] evacuee decontamination. Rather, NUREG-0654 focuses on providing for decontamination of emergency workers, who would be likely to face greater contamination dangers than evacuees would. See the evaluation criteria under § II.K in NUREG-0654.

.

Therefore Contention 240 is admitted, but only on the following questions: (1) What agency of Chatham County government is responsible for the decontamination of evacuees at the Chatham County Shelters? and (2) Which emergency response organizations are assigned the responsibility of providing support for the decontamination of evacuees? Perhaps all that is needed to answer these questions is authoritative clarification of the relevant sections of the ERPs.

Carolina Power & Light Co. (Shearon Harris Nuclear Power Plant, Units 1 & 2), LBP-84-29B, 20 NRC 389, 397, 398 (1984). Another board considered disposal of wash water, but the opinion does not reveal whether this was limited to emergency workers and their equipment or whether it covered the public as well. In any event, the Board did not require particular methods for disposing of wash water:

Contention 19(kk) alleges that the County Plan is deficient because it does not provide for disposal of contaminated equipment, vehicles, decontaminated [sic] water, or any other materials that might be contaminated.

. . . .

84. Vehicles can be decontaminated by washing. Water would be released but is not likely to be a public health or safety problem -- personal health and safety of evacuees would be the initial concern. . . . The State would, however, monitor the disposal of decontamination water in the host counties.

Kansas Gas & Elec. Co. (Wolf Creek Generating Station, Unit 1), LBP-84-26, 20 NRC 53, 79, 111 (1984).

This view -- that wash water is not likely to be a public health or safety problem -- is consistent with the view of the Director of the New York State Radiological Emergency Preparedness Group. As he points out in the two letters attached to this Response, decontamination waste water would be so diluted that it would not be a problem. This is consistent also with LILCO's testimony on Contention 81, quoted above. In short, there are no NRC requirements or guidelines about how decontamination for members of the public should take place, and so the details of how LILCO will make such provisions are outside the scope of the regulations and outside the scope of this proceeding. To the extent that Ms. Meyland's testimony raises any issue recognizable by this Board, it is an issue, as noted above, that should have been raised in the context of planning for the 50-mile EPZ and is now untimely.

4. Specific Parts of the Testimony Would Be Irrelevant Even if the Testimony as a Whole Were Admissible

In addition to the objections to Ms. Meyland's testimony set out above, two portions of the testimony are irrelevant even to the thesis that the testimony attempts to establish. To be specific, (1) lines 16-27 on page 7, which say that the aquifer is already stressed by toxic chemical pollution, and (2) lines 15-26 on page 9, which say that too much water is

presently being drawn from the aquifer, are irrelevant. Their purpose seems to be to show that the water supply is already in bad condition (and radiological contamination would make it even worse). But this is entirely irrelevant to the issue of the impact on the water supply of an accident at Shoreham.

III. CONCLUSION

For the foregoing reasons, LILCO submits that the testimony submitted by the Intervenors should not be admitted because it is untimely, outside the scope of the very narrow issue on which the record has been reopened, or not relevant to or probative of the issue whether NRC regulations are met. Likewise no public hearing on the testimony should be held.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

BY James N. Christman
James N. Christman
Lee B. Zeugin
Kathy E. B. McCleskey

Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, VA 23219

DATED: February 26, 1985

UNITED STATES OF AMERICA '85
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF JOHN A. WEISMANTLE

My name is John A. Weismantle. I am Manager of the Local Emergency Response Implementing Organization.

1. Based on discussions with planners involved in radiological emergency planning for the operating nuclear plants in New York State (Indian Point, FitzPatrick, Nine Mile Point, and Ginna), LERIO believes (1) that no monitoring and decontamination center designated in the emergency plans for any of those facilities has been required to apply for an SPDES permit and (2) that no such center has been the subject of a state environmental impact statement under the State Environmental Quality Review Act.

2. In order to protect Long Island's groundwater resources, a study entitled "The Long Island Comprehensive Waste Treatment Management Plan" (or "the 208 Study"), was completed by the Long Island Regional Planning Board under Section

208 of the Clean Water Act Amendments of 1972. The 208 Study divides Long Island into eight hydrogeologic zones and makes specific recommendations pertaining to each zone. The 208 Study identified deep flow recharge areas on Long Island as consisting of hydrogeologic zones I, II, and III.

3. According to the 208 Study, Suffolk County Community College (Zone III), SUNY - Stony Brook (Zone I), and SUNY - Farmingdale (Zone II) are located in the primary groundwater recharge areas for Long Island, as shown on the map of hydrogeologic zones in the Nassau-Suffolk 208 Study Area (Figure 3-2 on page 45 of the 208 Study).

John A. Weismantle

Subscribed and sworn to before me this ____ day of _____, 1985.

My commission expires: _____.

Notary Public

DOCKETED
USNPC

Attachment 2

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

FEB 28 AM 11:12

OFFICE OF SECRETARY
DOCKETING & SERVICE

Before the Atomic Safety and Licensing Board

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

AFFIDAVIT OF EDWARD B. LIEBERMAN ON NASSAU COLISEUM

1. My name is Edward B. Lieberman. My professional qualifications are at Tab 10 after page 4068 of the hearing transcript in this proceeding.

2. I have performed a variety of activities for LILCO relating to the traffic portions of the LILCO Transition Plan. As part of those efforts, I have surveyed the available parking facilities accessible to the Nassau Coliseum.

3. The results of my survey are described in the three-page letter which is attached to this affidavit. Briefly, I have concluded that the Coliseum parking facilities are adequate to accommodate the expected peak demand from an evacuation of the entire Shoreham EPA. In addition, nearby parking areas provide additional capacity should an unexpected surge in traffic demand occur.

Subscribed and sworn to before me this _____ day of February 1985.

My commission expires: _____

Notary Public

KLD ASSOCIATES

INCORPORATED

300 Broadway
Huntington Station, N.Y. 11746
(516) 549-403

July 24, 1984

Mr. John Weismantle
LILCO
100 E. Old Country Road
Hicksville, NY 11801

Dear John:

On July 20, 1984, I undertook an on-site survey of the available parking facilities accessible to the Nassau County Veterans Memorial Coliseum.

There are three major parking facilities:

- On-site
- Hofstra University Campus
- Nassau County Community College Campus

The on-site parking is partitioned into several fields, separated by access roads or curbed medians. The aggregate number of parking slots, as counted during this survey, was estimated at 6900.

The Hofstra site is to the west, across Earle Ovington Blvd. There are several large paved areas at the eastern edge of this site (closest to the Coliseum) which are not presently delineated for parking. (This pavement was originally used for flight operations.) I estimate a total parking capacity of 1300 vehicles on the paved areas. There are also grassy areas at grade (i.e. no curbs) which could accommodate some 600 vehicles, weather permitting.

The Nassau County Community College (NCCC) campus to the north of the Coliseum, has a large parking field at its southern edge (closest to the Coliseum). This parking field, which is behind (i.e. south of) the College Union building can accommodate approximately 1800 vehicles.

Both the Hofstra and NCCC parking areas are within one-half mile of the Coliseum building and are accessible to the Coliseum property via paved roads and paths. Thus, the total number of vehicles that can be accommodated at any time is approximately:

$$6900 + 1300 + 1800 = 10,000$$

Estimate of Parking Demand

This estimate addresses the worst-case scenario wherein the entire EPZ must be evacuated during the summer. We will adopt the assumption that 20 percent of all evacuating vehicles will travel to this Coliseum. Thus, the total demand will approximate:

$$0.2 \times 53000 = 10,600 \text{ vehicles}$$

The arrival rate must be estimated. It is well-known that traffic exhibits a natural tendency to disperse as it travels over a system of highways. Thus, if these vehicles leave the EPZ over a period of 4.6 hours, then they can be expected to arrive in the neighborhood of the Coliseum over a period of say, 6 hours, after travelling a distance of some 45 miles. The average arrival rate will then be approximately:

$$10,600 \div 6 = 1770 \text{ vehicles per hour}$$

The departure rate must be estimated. This departure rate depends on the rate at which people are processed and then assigned to a nearby shelter.

At this time, we have not developed the detailed procedures for processing these people. If we assume that all people will be processed in 12 hours, then the departure rate will approximate 880 vehicles per hour. If we assume a one-hour time lag, then the maximum number of vehicles requiring parking at a point in time that occurs at the end of 6 hours, is:

$$1770 + (1770 - 880) \times 5 = 6220 \text{ vehicles}$$

It thus appears that the Coliseum parking facilities are adequate to accommodate this peak demand ($6220 < 6900$). The adjoining parking areas can be used to accommodate surges in demand. In all, the estimated peak demand for parking is less than two-thirds the available capacity.*

*NCCC has an additional 3800 parking slots available which are within one mile from the Coliseum. Hofstra University has additional parking capacity within one mile of the Coliseum. The Marriott Hotel, to the immediate east of the Coliseum property, can probably provide about 100-200 parking areas.

Accessibility

The Coliseum parking areas are accessible from the east via Meadowbrook Parkway (a total of 3 lanes on the ramps - 2 from the N.B. direction, 1 from the S.B. direction) and from Merrick Avenue, onto the westbound Charles Lindbergh Blvd. access road (3 lanes in each direction). Also, access from the south via Hempstead Turnpike (3 lanes in each direction), from the west via Earle Covington Road. Direct access to the Coliseum parking lot is provided by more than 12 entry lanes.

It is my opinion that the aggregate capacity of all access roads to these parking facilities exceeds 4000 vehicles per hour in each direction (i.e. inflow and outflow).

Personnel

It will be necessary to assign personnel to assist the public in gaining access to the parking areas. This personnel should consist of:

- Nassau County Police along all public roads
- Parking guides within all parking areas.

Approximately a dozen personnel of each category would be desirable plus supervisory personnel.

Yours truly,



Edward Lieberman

EL:ld

STATE OF NEW YORK



DEPARTMENT OF HEALTH

TOWER BUILDING • THE GOVERNOR NELSON A. ROCKEFELLER EMPIRE STATE PLAZA • ALBANY, N.Y. 12237

DAVID AXELROD, M.D.
Commissioner

DOCKETED
USNRC

SEP 28 11:12

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

August 29, 1983

RECEIVED
SEP 1 1983

OFFICE OF EMERGENCY PREPAREDNESS

Mr. George Brower
Director
Disaster/Emergency Preparedness
200 North Second Street
Fulton, NY 13069

Dear Mr. Brower:

Referring to your question today on the decontamination of vehicles leaving the 10 mile EPZ as to what problems may arise from water used to wash off a vehicle that may become contaminated, we believe that this is not a problem that creates any major concern.

It is believed that the small amount of contamination that may settle on a car will be diluted to a great extent by washing and that this water can either seep into the ground or enter the sewer system. Care should be taken to see that the wash water does not enter the area where people gather.

The major concern with contamination is still with human beings first and equipment second. I hope this information gives you enough guidance to answer your questions.

Sincerely yours,

Donald D. Davidoff
Donald D. Davidoff
Director
Radiological Emergency
Preparedness Group

cc: Mr. Kowieski, FEMA

STATE OF NEW YORK  DEPARTMENT OF HEALTH

CORNING TOWER • THE GOVERNOR NELSON A. ROCKEFELLER EMPIRE STATE PLAZA • ALBANY, N.Y. 12237

DAVID AXELROD, M.D.
Commissioner

November 16, 1983

RECEIVED
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OFFICE OF EMERGENCY PREPAREDNESS

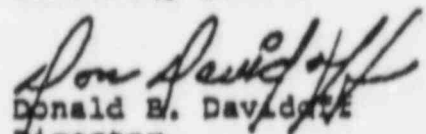
Mr. George Brower
Director
Disaster/Emergency Preparedness
200 North Second Street
Fulton, NY 13069

Dear Mr. Brower:

The question of what to do with waste shower water that has become contaminated due to the cleansing of a contaminated individual has been asked.

In consultation with Dr. Karim Rimawi, Director, Bureau of Environmental Radiation Protection, it has been determined that such waste water should be allowed to flow directly into the normal sewer system since it would be greatly diluted by the volume of water in the system and there are no health problems.

Sincerely yours,


Donald B. Davidoff
Director
Radiological Emergency
Preparedness Group



Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

February 12, 1985

Michael S. Miller, Esq.
Kirkpatrick & Lockhart
1900 M Street, N.W.
Washington, D.C. 20036

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

Dear Mr. Miller:

This office is in receipt of your letter dated January 31, 1985 in which you requested the following information relating to the Shoreham Nuclear Power Station and the proposed utilization of the Nassau Coliseum:

1. All documents and correspondence of any kind between or among representatives of the FEMA and the NRC Staff and/or LILCO concerning LILCO's proposed use of the Nassau Coliseum.
2. All documents relating to the use or proposed use by any licensee, including LILCO, of a relocation center (or other facility at which all evacuees would be monitored and, if necessary, decontaminated in the event of a radiological accident) which is 40 or more miles from the licensee's nuclear power plant.
3. All documents relating to the health effects to EPZ evacuees or to the population of Nassau County or other areas outside the EPZ that could result from LILCO's proposal to use the Nassau Coliseum as a relocation center.

Upon receipt of the above referenced letter FEMA's Regional Counsel requested clarification of the request from counsel for Suffolk County. It was agreed that the second question only required identification of those sites where monitoring and/or decontamination functions were located more than (40) miles from a Nuclear Generating facility. In addition, it was agreed that the last question was directed to the identification of Shoreham site specific studies and was not an attempt to ascertain the existence of general literature in the field.

In reference to the above inquiry, FEMA provides the following responses:

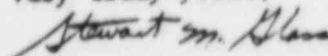
1. To the best of our knowledge and belief, all the documents and correspondence concerning LILCO's proposed use of the Nassau Coliseum that are in FEMA's possession were provided through the service list in the above captioned matter.

2. The attached charts contain the identification of those sites utilizing facilities which are thirty or more miles from a nuclear power plant to monitor, and if necessary, decontaminate evacuees in the event of a radiological accident. This material was compiled at the direction of this office. The difference in form utilized in the attached charts is a result of having different individuals compile the material to insure a timely response and has no other intended significance.

3. It is our belief that generic material does exist relating to the health effects on EPZ evacuees around Nuclear Power Plants but this office is not aware of any specific documents relating to LILCO's proposal to use the Nassau Coliseum as a relocation center.

FEMA is aware of the Board's ruling of February 5, 1985 and its voluntary response to the above questions is intended to facilitate the dissemination of information in this proceeding without unduly hindering the ability of FEMA to carry out its assigned responsibilities. This response is not a waiver of any rights that FEMA has to formally object to these requests or any possible future requests that may result directly or indirectly from these responses.

Very truly yours,



Stewart M. Glass
Regional Counsel

cc: Morton B. Margulies, Chairman
Frederick J. Shon
Dr. Jerry R. Kline
Jonathan D. Feinberg, Esq.
Howard L. Blau, Esq.
Atomic Safety and Licensing
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Edward M. Barrett, Esq.
Marc W. Goldsmith
Fabian G. Palomino, Esq.
Hon. Peter Cohalan
John F. Shea, III, Esq.
James B. Dougherty, Esq.
Ms. Nora Bredes
Gerald C. Crotty, Esq.
Chris Nolin
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Norman L. Greene, Esq.
W. Taylor Reveley II, Esq.
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Atomic Safety and Licensing
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Martin Bradley Ashare, Esq.
MHB Technical Associates
Mr. Jay Dunkleberger
Docketing and Service Section
Spence Perry, Esq.
Leon Friedman, Esq.
Ben Wiles, Esq.
Bernard M. Bordenick, Esq.
Donald Irwin, Esq.

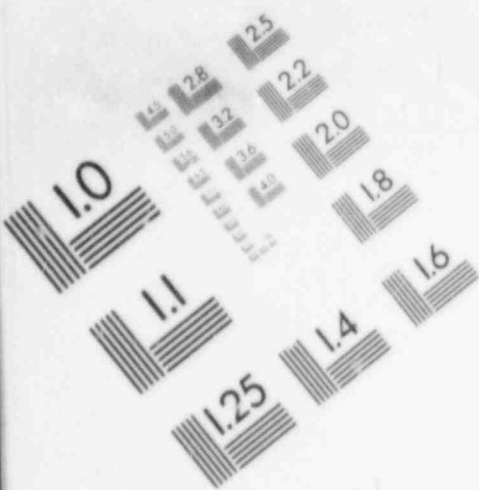
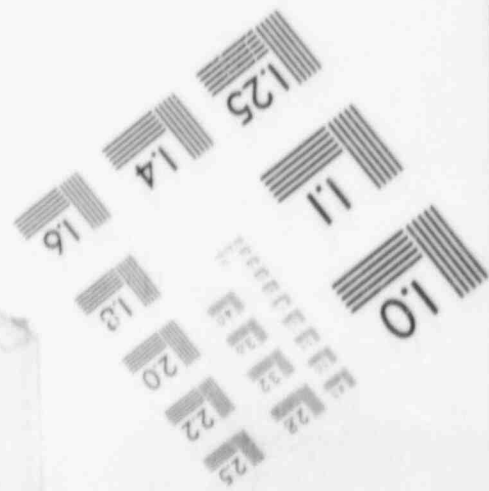
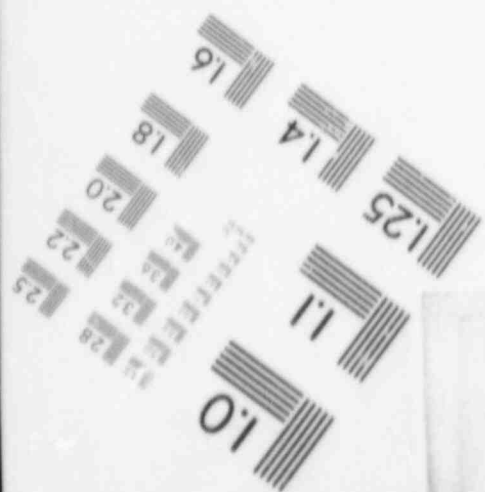
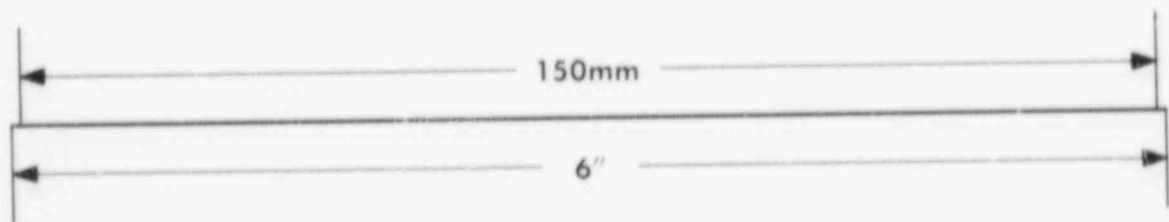
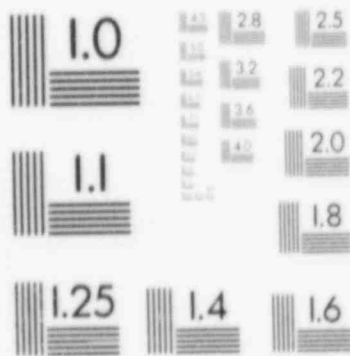
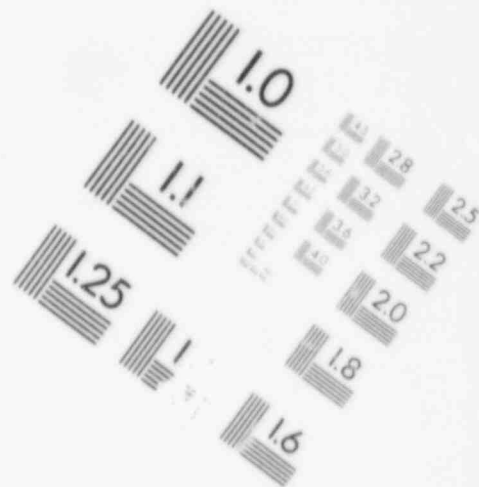


IMAGE EVALUATION
TEST TARGET (MT-3)



Plant Name	Distance From Plant	Name of Facility	Purpose of Facility
1. Arkansas Nuclear One	30 Miles	Morrilton Reception Center, Morrilton, Arkansas	Reception Center Monitoring and Decontamination
2. River Bend	30 Miles	Riverside Centroplex East Baton Rouge, LA	" "
3. Grand Gulf	38 Miles	Ferriday Reception Center, Ferriday, LA	" "
4. Waterford	50 Miles	Riverside Centroplex East Baton Rouge, LA	" "
5. Millstone	35 Miles	City Hall/Parking lot Weatherfield, CT	Monitoring Decontamination Registration
	35 Miles	Yale Bowl New Haven, CT	" "
6. Trojan	46 Miles* *This mileage is in air miles (straight vector) from plant location; actual road miles would be greater than 46.	Lewis County Assistance Center	Registration, Monitoring, Decontamination
7. Browns Ferry	32 Miles	Morris School Huntsville, AL	" "
	32 Miles	Westlawn Middle School, Huntsville, AL	" "
	32 Miles	Milton Frank Stadium, Huntsville, AL	" "
	32 Miles	Huntsville-Madison County Airport, Huntsville, AL	" "

Plant Name	Distance From Plant	Name of Facility	Purpose of Facility
8. Catawba	30 Miles	Lockhart School, Lockhart, SC	Shelter - Monitoring/ Decontamination
	39 Miles	Union High School, Union, SC	" "
	30 Miles	Cherokee Vocational School, Cherokee County, SC	" "
	34 Miles	East Junior High School, Cherokee County, SC	" "
	32 Miles	Gaffney High School, Gaffney, SC	Shelter - Monitoring/ Decontamination
	34 Miles	Luther Vaugh Elementary School, Cherokee County, SC	" "
	35 Miles	B. D. Lee Elementary School, Cherokee County, SC	" "
	35 Miles	West School, Cherokee County, SC	" "
9. Crystal River	41 Miles	Bronson High School Bronson, FL	" "
	42 Miles	Chiefland High School, Chiefland, FL	" "
	41 Miles	Williston High School, Williston, FL	" "
	41 Miles	Williston Elementary School, Williston, FL	" "
	41 Miles	Williston Intermediate School, Williston, FL	" "
	32 Miles	Cedar Key School, Cedar Key, FL	" "

Plant Name	Distance From Plant	Name of Facility	Purpose of Facility
10. Grand Gulf	40 Miles	Hazlehurst North Campus Elementary School, Hazlehurst, MS	Shelter - Monitoring/ Decontamination
	40 Miles	Hazlehurst South Campus Elementary School, Hazlehurst, MS	" "
	37 Miles	North Natchez Adams High School, Natchez, MS	" "
	37 Miles	South Natchez Adams High School, Natchez, MS	" "
11. Watts Bar	35 Miles	Oliver Springs Elementary School, Oliver Springs, TN	Shelter - Monitoring/ Decontamination
	35 Miles	Oliver Springs High School, Oliver Springs, TN	" "
12. Palo Verde	35 Miles	Tolleson High School Tolleson, AZ	These four centers are backup/overflow relocation centers only. The primary centers, all less than 30 miles from the plant, are designed to accommodate all anticipated needs.
	40 Miles	Glendale High School Glendale, AZ	
	50 Miles	Trevor Browne High School Trevor Browne, AZ	
	50 Miles	Quartzsite Community Center Quartzsite, AZ	

Facilities Located 30-40 Miles From A Nuclear Power Plant

<u>Site</u>	<u>Facility Name and Location</u>	<u>Purpose of Facility</u>				
		<u>rad</u>	<u>mon</u>	<u>decon</u>	<u>rcpt</u>	<u>cong ca</u>
Quad Cities	Mt Carroll Unit District Schools Mt Carroll, IL	x		x	x	x
	Sterling High School Sterling, IL	x		x	x	x
	Challand Jr High School Sterling, IL	x		x	x	x
	Franklin Grade School Sterling, IL	x		x	x	x
	Lincoln Grade School Sterling, IL	x		x	x	x
	Wallace Grade School Sterling, IL	x		x	x	x
	Washington Grade School Sterling, IL	x		x	x	x
	Jefferson Grade School Sterling, IL	x		x	x	x
<hr/>						
Byron	Mt Carroll Unit District Schools Mt Carroll, IL	x		x	x	x
	Paw Paw Elementary School Paw Paw, IL	x		x	x	x
	Paw Paw High School Paw Paw, IL	x		x	x	x
	Sycamore High School Sycamore, IL	x		x	x	x
	Sycamore Jr High School Sycamore, IL	x		x	x	x
	North Elementary School Sycamore, IL	x		x	x	x
	Southeast Elementary School Sycamore, IL	x		x	x	x
	West Elementary School Sycamore, IL	x		x	x	x

Zion

Alden-Hebron High School (#19) Hebron, IL	x	x	x	x
Alden-Hebron Elementary School Hebron, IL	x	x	x	x
Woodstock High School Woodstock, IL	x	x	x	x
Northwood Jr High School Woodstock, IL	x	x	x	x
Westwood School Woodstock, IL	x	x	x	x
Olson School Woodstock, IL	x	x	x	x
Northwood Elementary School Woodstock, IL	x	x	x	x
Greenwood School Woodstock, IL	x	x	x	x
Dean Street School Woodstock, IL	x	x	x	x
Clay Street School Woodstock, IL	x	x	x	x
Marion Central Catholic HS Woodstock, IL	x	x	x	x
St Marys Grade School Woodstock, IL	x	x	x	x
Illinois National Guard Armory Woodstock, IL	x	x	x	x
Sedom School Woodstock, IL	x	x	x	x
McHenry Community College Crystal Lake, IL	x	x	x	x
Crystal Lake Central High School Crystal Lake, IL	x	x	x	x
Crystal Lake High School South Crystal Lake, IL	x	x	x	x
North Jr High School Crystal Lake, IL	x	x	x	x

Zion (cont)

Lundahl Jr High School Crystal Lake, IL	x	x	x	x
Prairie Grove School Crystal Lake, IL	x	x	x	x
North Elementary School Crystal Lake, IL	x	x	x	x
West Elementary School Crystal Lake, IL	x	x	x	x
South Elementary School Crystal Lake, IL	x	x	x	x
Central Elementary School Crystal Lake, IL	x	x	x	x
Coventry School Crystal Lake, IL	x	x	x	x
Canterbury Elementary School Crystal Lake, IL	x	x	x	x
Emanuel Lutheran School Crystal Lake, IL	x	x	x	x
St Thomas the Apostle School Crystal Lake, IL	x	x	x	x
H.D.Jacobs High School Algonquin, IL	x	x	x	x
Algonquin Middle School Algonquin, IL	x	x	x	x
Kenneth E. Weubert Elem School Algonquin, IL	x	x	x	x
Eastview Elementary School Algonquin, IL	x	x	x	x
Conant High School Hoffman Estates, IL	x	x	x	x
Hoffman Estates High School Hoffman Estates, IL	x	x	x	x
Schaumburg High School Schaumburg, IL	x	x	x	x
Maine Twp High School East Park Ridge, IL	x	x	x	x

Zion (cont)

Maine Twp High School South Park Ridge, IL	X	X	X	X
Maine West High School Des Plaines, IL	X	X	X	X
Algonquin Jr High School Des Plaines, IL	X	X	X	X
Chippewa Jr High School Des Plaines, IL	X	X	X	X
Iroquois Jr High School Des Plaines, IL	X	X	X	X
Cumberland School Des Plaines, IL	X	X	X	X
Central High School Des Plaines, IL	X	X	X	X
Forrest School Des Plaines, IL	X	X	X	X
North School Des Plaines, IL	X	X	X	X
Orchard Place School Des Plaines, IL	X	X	X	X
Plainfield School Des Plaines, IL	X	X	X	X
South School Des Plaines, IL	X	X	X	X
Terrace School Des Plaines, IL	X	X	X	X
Elk Grove High School Elk Grove Village, IL	X	X	X	X
Liberty Jr High School Elk Grove, IL	X	X	X	X
Margaret Mead Jr High School Elk Grove, IL	X	X	X	X
Grove Jr High School Elk Grove, IL	X	X	X	X
Admiral Byrd Elementary School Elk Grove, IL	X	X	X	X

Zion (cont)

Clearmont Elementary School Elk Grove, IL	X	X	X	X
Salt Creek Elementary School Elk Grove, IL	X	X	X	X
Rupley Elementary School Elk Grove, IL	X	X	X	X
Adlai Stevenson SCHOOL Elk Grove, IL	X	X	X	X
Adolph Link SCHOOL Elk Grove, IL	X	X	X	X
Elk Grove Twp Community Day Care Center Elk Grove, IL	X	X	X	X
Grant Wood Senior Center Elk Grove, IL	X	X	X	X
Elk Grove Public Library Elk Grove, IL	X	X	X	X
Lions Park Community Center Elk Grove, IL	X	X	X	X
Queen Of Rosary (SCHOOL) Elk Grove, IL	X	X	X	X
Streamwood High School Streamwood, IL	X	X	X	X
Canton Middle School Streamwood, IL	X	X	X	X
Taft Jr High School Streamwood, IL	X	X	X	X
Glenbrook Elementary School Streamwood, IL	X	X	X	X
Heritage Elementary School Streamwood, IL	X	X	X	X
Oak Hill Elementary School Streamwood, IL	X	X	X	X
Ridge Circle Elementary School Streamwood, IL	X	X	X	X
Sunnydale SCHOOL Streamwood, IL	X	X	X	X

Zion (cont)	Elgin High School Elgin, IL	x	x	x	x
	Larkin High School Elgin, IL	x	x	x	x
	Abbott Middle School Elgin, IL	x	x	x	x
	Ellis Middle School Elgin, IL	x	x	x	x
	Kimball Jr High School Elgin, IL	x	x	x	x
	Larson Middle School Elgin, IL	x	x	x	x
	Century Oaks School Elgin, IL	x	x	x	x
	Channing Elementary School Elgin, IL	x	x	x	x
	Coleman Elementary School Elgin, IL	x	x	x	x
	Gifford Elementary School Elgin, IL	x	x	x	x
	Highland Elementary School Elgin, IL	x	x	x	x
	Hillcrest School Elgin, IL	x	x	x	x
	Huff Elementary School Elgin, IL	x	x	x	x
	Illinois Park School Elgin, IL	x	x	x	x
	Lords Park Elementary School Elgin, IL	x	x	x	x
	Sheridan Elementary School Elgin, IL	x	x	x	x
	Willard Grammar School Elgin, IL	x	x	x	x
	Elgin Community College Elgin, IL	x	x	x	x

Zion (cont)

Elgin Mental Health Center Elgin, IL	x	x	x	x
Illinois National Guard Armory Elgin, IL	x	x	x	x
Dundee Community High School Carpentersville, IL	x	x	x	x
Dundee Middle School Dundee, IL	x	x	x	x
Ferry Middle School Carpentersville, IL	x	x	x	x
Dundee Highlands Elementary School Dundee, IL	x	x	x	x
Lakewood Middle School Carpentersville, IL	x	x	x	x
Golfview Elementary School Carpentersville, IL	x	x	x	x
Irving Crown High School Carpentersville, IL	x	x	x	x
Kings Road Elementary School Carpentersville, IL	x	x	x	x
Parkview Elementary School Carpentersville, IL	x	x	x	x
Meadowdale Elementary School Carpentersville, IL	x	x	x	x
Cary-Grove High School Cary, IL	x	x	x	x
Cary Jr High School Cary, IL	x	x	x	x
Briargate Elementary School Cary, IL	x	x	x	x
Oak Knoll Elementary School Cary, IL	x	x	x	x
Maplewood Elementary School Cary, IL	x	x	x	x
Saints Peter and Paul <i>SCHOOL</i> Cary, IL	x	x	x	x

Zion (cont)

East Troy Jr High School East Troy Village, WI	X	X	X	X
St Peters Elementary School East Troy Village, WI	X	X	X	X
East Troy High School East Troy Village, WI	X	X	X	X
East Troy Elementary School East Troy Village, WI	X	X	X	X
Stone Elementary School East Troy Village, WI	X	X	X	X
St Edwards Elementary School East Troy Village, WI	X	X	X	X
Gateway Technical Institute Elkhorn City, WI	X	X	X	X
St Patricks Grade School Elkhorn City, WI	X	X	X	X
Lakeland School Elkhorn City, WI	X	X	X	X
Elkhorn Middle School Elkhorn City, WI	X	X	X	X
Elkhorn High School Elkhorn City, WI	X	X	X	X
Westside Primary School Elkhorn City, WI	X	X	X	X
Fontana Elementary School Fontana, WI	X	X	X	X
Denison Jr High School Lake Geneva, WI	X	X	X	X
Walworth Elementary School Walworth, WI	X	X	X	X
Big Foot High School Walworth, WI	X	X	X	X
North Walworth School Walworth, WI	X	X	X	X
Williams Bay High School Williams Bay, WI	X	X	X	X

Zion (cont)	George Williams College Williams Bay, WI	x	x	x	x
	Reak School Linn Township, WI	x	x	x	x
	Traver Elementary School Linn Township, WI	x	x	x	x
	N.W. Military Academy Linn Township, WI	x	x	x	x

Prairie Island	Univ of Wisconsin - Stout Menominee, WI	x	x	x	x
	State Fair Grounds (4-H BLDG) St Paul, MN	x	x	x	x

Monticello	State Fair Grounds (4-H BLDG) St Paul, MN	x	x	x	x
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		MILES FROM PLANT				
Perry	Southeast Elementary School Conneaut, OH	32	x	x	x	x
	Conneaut High School Conneaut, OH	32	x	x	x	x
	Chestnut School Conneaut, OH	32	x	x	x	x
	Lakeview School Conneaut, OH	32	x	x	x	x
	West Main School Conneaut, OH	32	x	x	x	x

Facilities Located Over 40 Miles From A Nuclear Power Plant

<u>Site</u>	<u>Facility Name and Location</u>	<u>Purpose of Facility</u>				
		rad	mon	decon	rcpt	cong ca
Prairie Island	Olmsted County Fair Grounds Rochester, MN	x		x	x	x
<hr/>						
Zion	St Andrews School Delavan, WI	x		x	x	x
	Delavan Christian School Delavan, WI	x		x	x	x
	Wileman School Delavan, WI	x		x	x	x
	Delavan Phoenix Delavan, WI	x		x	x	x
	Park School Delavan, WI	x		x	x	x
	Delavan-Darien High School Delavan, WI	x		x	x	x
	Learn/Play Nursery School Delavan, WI	x		x	x	x
	Franklin School Whitewater, WI	x		x	x	x
	Whitewater High School Whitewater, WI	x		x	x	x
	Washington Elementary School Whitewater, WI	x		x	x	x
	Christian Education Building Whitewater, WI	x		x	x	x
	Lincoln Elementary School Whitewater, WI	x		x	x	x
	Univ Of Wisconsin - Whitewater Whitewater, WI	x		x	x	x

Region III - Philadelphia

<u>Plant Name/Location</u>	<u>Distance from Plant</u>	<u>Number of Facilities</u>	<u>Purpose*</u>
Surry (Virginia)	between 30 & 40 miles	1	
TMI (Pennsylvania)	between 30 & 40 miles over 40 miles	37 146	
(One county lists all mass care centers - 90) will depend an need			
Limerick (Pennsylvania)	between 30 & 40 miles	2	
Peach Bottom (Pennsylvania)	between 30 & 40 miles	2	
Beaver Valley (Pennsylvania)	between 30 & 40 miles	4	
Susquehanna (Pennsylvania)	between 30 & 40 miles over 40 miles	24 4	
Salem (New Jersey)	between 30 & 40 miles	2	

* All mass care facilities will potentially serve as public monitoring and decontamination centers.

Nuclear Power Plant	Name & Location of Facility for Monitoring and/or decontamination			Purpose	Comments
	Distance from plant	30-40 miles from plant*	>40 miles from plant		
Callaway	30	Hearnes Mult-Purpose Bldg. Columbia, MD		M and D	* Sites selected based on these 2 criteria only. Facilities < 30 miles not included, unless they were very close to 30.
Cooper			NW Missouri State Univ. Maryville, MD	M and D	
a) MD	~50			M and D	
b) NE	35	11th & 3rd Corse & 21st & 4th " Nebraska City, NE		M and D performed at roadblocks also	
Duane Arnold	58 30 75 68 28	Iowa City, IA	Marshall town, IA Davenport, IA Dubuque, IA	M and D M and D M and D M and D M and D	
Ft. Calhoun					
a) NE	43		First Baptist Church, Bellewue, NC	M and D	
b) IA	50		Denison, IA 1) Zion Lutheran Church 2) Carlyle Memorial 3) Sr. Citizens Center 4) Denison Jr. High 5) Denison Comm. High	Registration & M Plan does not explicitly detail M&D M-State Patrol D-Selected Central Locations	
Quad Cities					All within 20 miles from plant
Wolf Creeek	32 28 28 29 30	All in Kansas Ottawa H.S. Garnett H.S. Emporia State Univ. Lyon Co. Fairgrounds Iola National Guard Armory			

LOCATIONS OF MONITORING/DECONTAMINATION FACILITIES
FEBRUARY 1985

Attachment 5

SITE	NAME OF MONITORING DECONTAMINATION FACILITIES	FACILITY LOCATED 40 MILES OR MORE FROM THE PLANT	FURTHEST FACILITY FROM THE PLANT
Oyster Creek, N.J.	Carl Goetz School Patterson Road Jackson, New Jersey	None	Approximately 25 miles
Salem, NJ	Glassboro College Route 322 Glassboro, New Jersey	None	Approximately 28 miles
Indian Point, N.Y.	Dutchess Mall Fishkill, New Jersey	None	Approximately 31 miles
Ginna, N.Y.	Sperry Sr. High School 1799 Lehigh Station Road	None	Approximately 20 miles
Nine Mile Point	Jefferson Community College 120 Coffeen Street Watertown, New Jersey	Approximately 40 miles	-----

LILCO, February 26, 1985

DOCKETED
USNRC

'85 FEB 28 AM 11:12

CERTIFICATE OF SERVICE

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

I hereby certify that copies of LILCO'S RESPONSE TO INTERVENORS' PROFFERED TESTIMONY ON THE DESIGNATION OF NASSAU COLISEUM AS A RECEPTION CENTER were served this date upon the following by first-class mail, postage prepaid or, as indicated by an asterisk, by Federal Express, or, as indicated by two asterisks, by hand:

Morton B. Margulies,**
Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 402A
4350 East-West Hwy.
Bethesda, MD 20814

Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Jerry R. Kline**
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 427
4350 East-West Hwy.
Bethesda, MD 20814

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Frederick J. Shon**
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
East-West Tower, Rm. 430
4350 East-West Hwy.
Bethesda, MD 20814

Bernard M. Bordenick, Esq.**
Oreste Russ Pirfo, Esq.
Edwin J. Reis, Esq.
U. S. Nuclear Regulatory
Commission
7735 Old Georgetown Road
(to mailroom)
Bethesda, MD 20814

Donna Duer, Esq.**
Attorney
Atomic Safety and Licensing
Board Panel
U. S. Nuclear Regulatory
Commission
East-West Tower, North Tower
4350 East-West Highway
Bethesda, MD 20814

Fabian G. Palomino, Esq.*
Special Counsel to the
Governor
Executive Chamber
Room 229
State Capitol
Albany, New York 12224

Herbert H. Brown, Esq.**
Lawrence Coe Lanpher, Esq.
Christopher McMurray, Esq.
Kirkpatrick & Lockhart
8th Floor
1900 M Street, N.W.
Washington, D.C. 20036

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Mr. Jay Dunkleberger
New York State Energy
Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Stewart M. Glass, Esq.*
Regional Counsel
Federal Emergency Management
Agency
26 Federal Plaza, Room 1349
New York, New York 10278

Stephen B. Latham, Esq.*
Twomey, Latham & Shea
33 West Second Street
P.O. Box 398
Riverhead, New York 11901

Ralph Shapiro, Esq.*
Cammer & Shapiro, P.C.
9 East 40th Street
New York, New York 10016

James Dougherty, Esq.
3045 Porter Street
Washington, D.C. 20008


Jonathan D. Feinberg, Esq.
New York State Department of
Public Service, Staff Counsel
Three Rockefeller Plaza
Albany, New York 12223

Spence W. Perry, Esq.
Associate General Counsel
Federal Emergency Management
Agency
500 C Street, S.W.
Room 840
Washington, D.C. 20472

Ms. Nora Bredes
Executive Coordinator
Shoreham Opponents' Coalition
195 East Main Street
Smithtown, New York 11787

Gerald C. Crotty, Esq.
Counsel to the Governor
Executive Chamber
State Capitol
Albany, New York 12224

Martin Bradley Ashare, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788


James N. Christman

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

DATED: February 26, 1985