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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'88 MAR 28 P4:03

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

LILCO'S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
REGARDING LILCO'S EMERGENCY BROADCAST SYSTEM TO SUFFOLK COUNTY

Long Island Lighting Company, by its counsel, propounds the following requests for production of documents to Suffolk County ("Intervenor" or "the Intervenor"), pursuant to §§ 2.740, 2.740b, and 2.741 of the Nuclear Regulatory Commission's Rules of Practice. By propounding these requests for production of documents LILCO makes no admission or representation about the proper scope of the issues to be decided or the evidence that may be presented.

INSTRUCTIONS AND DEFINITIONS

The "Instructions" and Definitions" for this second set of requests on the EBS issue are the same ones set out in LILCO's First Set of Interrogatories and Requests for Production of Documents Regarding LILCO's Emergency Broadcast System to Suffolk County and New York State, dated February 24, 1988.

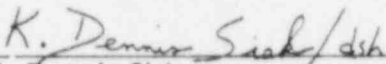
The following Requests are numbered beginning where the first set, dated February 24, 1988, left off.

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Requests for Production of Documents

13. Please identify and provide copies of any testimony or transcripts of testimony, including deposition testimony, given by Charles G. Perry, III regarding a zoning proceeding in Avon, Connecticut, before any local zoning body or any court.
14. Please identify and provide copies of all strip charts or other compilations or recordations of data, in any form or nature, concerning field surveys of the signal strength of WPLR-FM, specifically including any such field surveys conducted by or under the supervision or direction of Charles G. Perry, III or the firm of Moffet, Larson & Johnson, Inc.
15. Please identify and provide copies of all notebooks or other compilations or recordations of data, in any form or nature, concerning field surveys of the signal strength of any and all radio stations participating in LILCO's emergency broadcast system for the Shoreham Nuclear Power Station, specifically including any such field surveys conducted by or under the supervision or direction of Charles G. Perry, III or the firm of Moffet, Larson & Johnson, Inc.


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DATED: March 24, 1988

LILCO, March 24, 1988

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CERTIFICATE OF SERVICE

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

I hereby certify that copies of LILCO'S SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING LILCO'S EMERGENCY BROADCAST SYSTEM TO SUFFOLK COUNTY were served this date upon the following by telecopier as indicated by one asterisk, by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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DATED: March 24, 1988