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October 27, 1978

Jerome E. Sharfman, Esq., Chairman Atomic Safety and Licensing Appeal Board U.S. Nuclear Regulatory Comm. Washington, D.C. 20555

Re: In the Matter of Long Island Lighting Company (Jamesport Nuclear Power Station, Units 1 & 2) Docket Nos. 50-516 and 50-517

Dear Chairman Scharfman:

IRVINO LIKE

BERNARD J. REILLY WILBUR H. SCHNEIDER

DEORGE HOFFMAN EDWARD A. BROOKS, JR. WERNER J. ZUMBRUNN RICHARD C. HAND ENRICO J. CONSTANTINO PATRICIA A. DEMPSEY

Pursuant to the Appeal Board's request made at the October 19, 1978 oral argument in the above-captioned proceeding, please find enclosed redrawn copies of the display charts presented by the County at said argument. The charts have been redrawn to fit on standard size paper and maintain insofar as possible approximately the same relative scale and color schemes used in the originals. I have also enclosed notes explaining the charts and documenting the basis in the record for the data used in their preparation.

If detailed explanation of the small scale xeroxed figures distributed during oral argument is required, please so notify us. The only additional data reflected in those figures beyond what has been documented herein are the summer and winter peak forecasts presented by the Applicants in the 1978 149-b Report which the League of Women Voter's has requested the Board to take official notice of. Portions of this material are already in evidence in the form of LILCO 1978 summer peak forecasts and NYSEG 1978 winter peak forecasts as presented in Amendment 7 to the Environmental Report, pp. Q.3.3 and Q.3.4 (3/15/78). All of these data represent an updating of the portions of the 149-b Reports now in the record as documented in the enclosed attachments.

REILLY, LIKE AND SCHNEIDER Jerome E. Scharfman, Esq. October 27, 1978 Page 2

> Although exceptions might be taken to some details of the County's argument as presented in its Brief in Support of Exceptions, and graphically displayed in the enclosed charts, the implications of any such arguments cannot properly be evaluated in view of the Hearing Board's utter failure to consider and weigh such alternatives. Thus, it is the County's fundamental position that the Hearing Board, by its failure to consider the County's arguments, deprived itself of the opportunity to weigh the costs and benefits of relevant alternatives thus invalidating the entire decisional basis for its approval of the subject application.

> > Very truly yours,

Irving Like Special Counsel for the County of Suffolk

IL/jg

CC: Copy of letter with attachments:

Richard S. Salzman, Esq. Member, Atomic Safety & Licensing Member, Atomic Safety & Licensing Board

W. Taylor Reveley, III, Esq. Counsel for Applicant Long Island Lighting Company

Copy of letter without attachments:

Sheldon J. Wolfe, Esq. Mr. Ralph S. Decker Dr. Leonard E. Cheatum Edward J. Walsh, Jr., Esq. Dr. Harris Fischer Mrs. Laetitia deK. Bradley Dr. W. Reed Johnson

Bernard M. Bordenick, Esq. Counsel for NRC Staff Ms. Jean Tiedke, Ms. Shirley Bachrach - League of Women Voters

Ira Lee Zebrak, Esq. Joseph C. Gramer, Esq. Frederick H. Lawrence, Esq. NRC Docketing & Service Section NRC Office of the Secretary Jeffrey C. Cohen, Esq.