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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '88 APR -1 P3:31

In the Matter of )  
LONG ISLAND LIGHTING COMPANY )  
(Shoreham Nuclear Power Station, )  
Unit 1 )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket No. 50-322-OL-3  
(Emergency Planning)

NRC STAFF FIRST SET OF INTERROGATORIES  
TO SUFFOLK COUNTY, NEW YORK STATE, AND THE  
TOWN OF SOUTHAMPTON REGARDING CONTENTIONS 1-2, 4-8 AND 10

The NRC Staff, pursuant to 10 C.F.R. §§ 2.740 and 2.740b, serves the following interrogatories to Suffolk County, New York State and the Town of Southampton ("Intervenors") to be answered in writing under oath or affirmation within 14 days. Each Interrogatory shall be answered separately and fully and shall include all pertinent information available to Intervenors, their officers, directors, members, employees, advisors, representatives, or counsel, based upon the personal knowledge of the person answering.

In addition, Intervenors are requested, pursuant to 10 C.F.R. § 2.740(e), to supplement their responses as necessary with respect to the identity of each person expected to be called as an expert witness at hearing, the subject matter on which the witness is expected to testify and the substance of that testimony.

ALL REALISM CONTENTIONS (CONTENTIONS 1-2, 4-8 AND 10)

1. (a) Do you intend to call any witness on any of the Contentions 1, 2, 4, 5, 6, 7, 8, or 10?

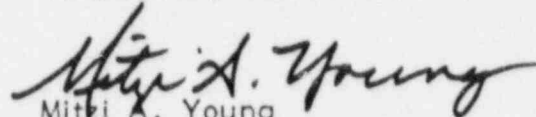
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- (b) If the answer to (a) is yes, which contentions?
  - (c) What is the substance of the testimony which will be presented on these contentions?
  - (d) Do you know the identity of such witness?
  - (e) If the answer to (d) is yes, identify each witness by name and address and provide their professional credentials and resume.
  - (f) What is the substance of the testimony of each witness?
  - (g) What is each witness' qualification to testify?
2. (a) Do you intend to subpoena any witnesses?
- (b) What persons do you intend to subpoena?
- (c) What subjects do you intend to ask them about?
- (d) What information do you intend to elicit by such examination?
3. (a) What documents do you intend to subpoena for the "realism" hearings?
- (b) Through which witness will you introduce such documents?
4. (a) Do you contend that LILCO's emergency plan supplemented by a best effort response by the affected governments will not meet the adequacy standards with respect to each matter at issue?  
See Memorandum and Order, February 29, 1988, at 3-4.
- (b) Specify each and every manner in which you maintain that LILCO's emergency plan supplemented by a "best effort" response by affected governments does not meet the adequacy standards with respect to each matter at issue.
- (c) Specify each and every way in which the matter(s) identified in (b), above, prevents a reasonable assurance finding from being made.

5. Do you intend to present "a positive case" at hearing in response to a prima facie case presentation by LILCO on the contentions? See Memorandum and Order, February 29, 1988, at 3-4.
6. Identify all persons who participated in, or substantially contributed to, the preparation of the responses to these Interrogatories.

Respectfully submitted,

  
Mitzi A. Young  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 31st of March 1988

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF FIRST SET OF INTERROGATORIES TO SUFFOLK COUNTY, NEW YORK STATE, AND THE TOWN OF SOUTHAMPTON REGARDING CONTENTIONS 1-2, 4-8 AND 10" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system or, as indicated by double asterisks, express mail, this 31st day of March 1988.

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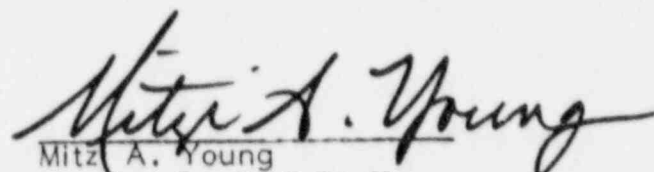
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