

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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88 FEB -1 P4 50

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,)	(School Bus Driver Issue)
Unit 1))	

LILCO'S THIRD SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF
SCHOOL BUS DRIVERS TO SUFFOLK COUNTY AND NEW YORK STATE

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

INSTRUCTIONS AND DEFINITIONS

The "Instructions" and "Definitions" for this third set of interrogatories on school bus drivers are the same ones set out in LILCO's First Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers to Suffolk County and New York State, dated January 5, 1988, at pages 1-7.

In addition, the term "bus drivers" as used below refers to people who, as part of their jobs (either part-time or full-time jobs) drive school buses or other buses (for example, ordinary mass transit buses). The term "school bus drivers" refers to people who drive buses to transport students to or from public, private, or parochial schools.

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The following Requests are numbered beginning where the second set, dated January 13, 1988, left off.

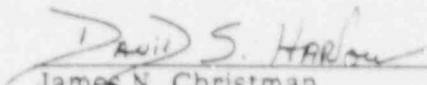
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

31. In the January 19, 1988 Response of the State of New York to LILCO's First Set of Interrogatories you list (pp. 4-6) in response to Request No. 8 certain information "provided by the schools to the New York State Education Department" concerning "student enrollment for schools within the 10-mile EPZ." Please provide the date of this information and list those persons who provided this information to the Education Department. Identify and provide any and all documents from which this information was obtained.
32. In the State of New York's January 19, 1988 Response, you list (pp. 6-8) in response to Request No. 9 certain information "provided by school districts to the New York State Education Department" concerning "the bus companies that contract with each school district identified in LILCO's Motion at Attachment 1." Please provide the date of this information and list those persons who provided this information to the Education Department. Identify and provide any and all documents from which this information was obtained.
33. In the State of New York's January 19, 1988 Response, you list (pp. 8-9) in response to Request No. 10 certain information "provided by the school districts" concerning "the number of school bus drivers and mechanics on the payroll of each pertinent school district." Please provide the date of this information and list those persons who provided this information. Identify and provide any and all documents from which this information was obtained.

34. Please provide, as agreed in your conversation with LILCO counsel on January 25, 1988, current copies of the radiological emergency preparedness plans for the counties of Orange, Putnam, and Rockland. Please provide as well current copies of the radiological emergency preparedness plans for the counties of Dutchess, Jefferson, and Onondaga.
35. To the extent not provided by your answers to Requests 23 and 24 in LILCO's Second Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers to Suffolk County and New York State, dated January 13, 1988, please provide one example known to Intervenors (as defined in Definition F of the "Definitions" cited above) of a bus driver who, in an emergency, attended to the safety of his own family before reporting to perform his bus driving duties. For this example please identify the emergency, the date, the organization for which the bus driver worked at the time, the duties the bus driver was expected to perform in connection with the emergency, the length of time before the bus driver reported to perform these duties, and the family members whose safety the driver attended to. Identify also the source (person or document or both) of this example.
36. Give a second example of a bus driver who, in an emergency, attended to the safety of his own family before reporting to perform his bus driving duties and identify the example and source as requested in Request No. 35 above.
37. Give a third example of a bus driver who, in an emergency, attended to the safety of his own family before reporting to perform his bus driving duties and identify the example and source as requested in Request No. 35 above.

38. In your response to LILCO Interrogatory No.1, Suffolk County's Answers to LILCO's First Set of Interrogatories and Document Requests Regarding Role Conflict of School Bus Drivers (Jan. 19, 1988), at 3, you refer to Professor Cole's "contacts with other experts on the subject." Please identify all such contacts.
39. In the same response cited in No. 38 above you refer to the "causes of role conflict and the factors existing on Long Island which could lead to role conflict." Identify all such "causes" and "factors."
40. In your response to LILCO Interrogatory 21 (dated January 19, 1988) you say that "[f]urther research, analysis and discovery may reveal additional State and/or local laws, regulations and ordinances that would be violated by LILCO's proposal." Have you identified any such laws, regulations, or ordinances? If so, what are they?
41. Are you aware of any contacts or communications in which any person or group has attempted to persuade schools or school districts (or representatives or employees of schools or school districts) not to participate in LILCO's auxiliary school bus driver arrangement or otherwise not to cooperate with LILCO with regard to the evacuation of schools during a Shoreham emergency? If so, please identify such contacts and communications. To the extent that such information is available to you or can be obtained, please include, for each contact and communication, the school or school district contacted and the person talked with, the date of each contact, and the substance of each conversation. Please produce any documents related to such contacts.

42. Are you aware of any contacts or communications in which any person or group has attempted to persuade any bus companies under contract to schools and school districts not to participate in LILCO's auxiliary school bus driver arrangement or otherwise not to cooperate with LILCO with regard to the evacuation of schools during a Shoreham emergency? If so, please identify those contacts as requested in Request No. 41 above.
43. Are you aware of any contacts or communications in which any person or group has attempted to persuade any bus company on Long Island, to the extent not identified in Request No. 42, not to participate in LILCO's auxiliary school bus driver arrangement or otherwise not to cooperate with LILCO with regard to the evacuation of schools during a Shoreham emergency? If so, please identify those contacts as requested in Request No. 41 above.
44. Are you aware of any contacts or communications in which any person or group has attempted to persuade any school bus drivers on the payroll of or under contract with schools or school districts not to participate in LILCO's auxiliary school bus driver arrangement or otherwise not to cooperate with LILCO with regard to the evacuation of schools during a Shoreham emergency? If so, please identify those contacts as requested in Request No. 41 above.


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DATED: January 27, 1988

LILCO, January 27, 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 THIRD SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS TO SUFFOLK COUNTY AND NEW YORK STATE were served this date upon the following by telecopier as indicated by one asterisk, or by first-class mail, postage prepaid.

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DATED: January 27, 1988