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January 27, 1988

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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,)	
Unit 1))	
_____)	

SUFFOLK COUNTY'S SUPPLEMENTAL RESPONSE TO
LILCO'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS

Pursuant to 10 CFR § 2.740(e), Suffolk County hereby supplements and amends its response to LILCO's First Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers, dated January 5, 1988.

LILCO Interrogatory No. 21

21. Please list each and every state and local law, regulation, or ordinance that intervenors claim might make LILCO's proposal to evacuate schools in the EPZ in a single wave illegal.

Answer. At this time, the County has determined that LILCO's proposal may violate the following State law provisions: Sections 305, 1604, 1709, 1711, 1805, 3623, 3624 and 3635 of the

Education Law; Part 156 of Title 8 of the Official Compilation of Codes, Rules and Regulations of the State of New York; Article 19-A of the Vehicle and Traffic Law; and Part 6 of Title 15 of the Official Compilation of Codes, Rules and Regulations of the State of New York.

Further research, analysis and discovery may reveal additional State and/or local laws, regulations and ordinances that would be violated by LILCO's proposal.

Respectfully submitted,



Michael S. Miller
J. Lynn Taylor

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Attorneys for Suffolk County

January 27, 1988

RELATED CORRESPONDENCE

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NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

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

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

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S ANSWERS TO LILCO'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS and SUFFOLK COUNTY'S SUPPLEMENTAL RESPONSE TO LILCO'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS have been served on the following this 27th day of January, 1988 by U.S. mail, first class, except as noted:

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DOCKET NUMBER 50-322-063
PROD. & UTIL. FAC.

HUNTON & WILLIAMS

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January 29, 1988

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Backup Documentation for Study on
Role Abandonment of Bus Drivers

Dear Mike:

Enclosed are copies of all backup documentation of the 16 emergency evacuation cases referenced in Robert B. Kelly's report entitled "Role Abandonment of Bus Drivers During Major Emergency Evacuations."

Sincerely,

Mary Jo Leugers/SDM

Mary Jo Leugers

438/6157

cc: Service List w/out Enclosures

DS03

CERTIFICATE OF SERVICE

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 a letter to Michael S. Miller of Kirkpatrick and Lockhart regarding "Backup Documentation for Study on Role Abandonment of Bus Drivers" were served this date upon the following by hand as indicated by one asterisk, or by first-class mail, postage prepaid.

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DATED: January 29, 1988