

ting school children from the Shoreham 10-mile EPZ during a radiological emergency at Shoreham, by using LILCO employees to serve as auxiliary, or backup, and primary school bus drivers, all as more fully described by LILCO in its "Motion for Summary Disposition of Contention 25.C ('Role Conflict' of School Bus Drivers)," dated October 22, 1987.

The following interrogatories and requests for production of documents are numbered beginning where the first set, dated January 4, 1988, left off.

INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS

33. Please identify each and every bus company that has entered into contracts with LILCO to provide buses in the event of a Shoreham emergency. For each bus company, specify whether such company provides buses and/or drivers for schools and/or school districts. For each such company which provides buses and/or drivers for schools and/or school districts, identify the particular schools and/or school districts with which the company contracts, and specify whether such schools and/or school districts are in or outside the EPZ. Provide a copy of all correspondence and documents relating to each and every bus company that has entered into a contract with LILCO.

34. With respect to each bus company identified in response to Interrogatory 33, please specify the number of buses that are

contracted to LILCO and further specify whether such buses are to be used by LILCO for the evacuation of the transit-dependent general population, the evacuation of the handicapped and special facilities, the evacuation of parochial and nursery schools, the evacuation of public schools, or some other purpose. If for some other purpose, specify that purpose.

35. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk County's Request for Admission No. 5 was denied. Please provide the basis for LILCO's denial of that Request.

36. Please identify each and every school district, having schools located in the EPZ, which has consented to any LILCO proposal to have LILCO employees drive buses to evacuate school children during a Shoreham emergency.

37. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk County's Request for Admission No. 6 was denied. Please provide the basis for LILCO's denial of that Request.

38. Please identify each and every school district, having schools located in the EPZ, which has consented to have LILCO em-

ployees drive school buses containing children during an evacuation from a Shoreham emergency.

39. Please provide a list of LILCO "auxiliary" bus drivers and, if such drivers have been or will be assigned as drivers of buses transporting school children from a particular school district or school within the EPZ, specify the LILCO drivers for each school or school district.

40. Please specify whether any LILCO "auxiliary" bus drivers have been approved by any school or school district and, if so, identify the school(s) and/or school district(s) which have approved such drivers as drivers of buses transporting school children.

41. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk County's Request for Admission No. 15 was denied. Please provide the basis for LILCO's denial of that Request.

42. Please identify each and every bus company, under contract with schools and/or school districts in the EPZ, which has agreed to allow LILCO or its employees to perform school bus driving duties covered by such contracts.

43. Please identify each and every school and/or school district in the EPZ, if any, which has agreed or has indicated that it will or may agree (specifying for each school and/or school district whether agreement has actually been obtained or may be obtained) to have its school bus drivers trained by LILCO. Provide any correspondence or documents relating to this interrogatory.

44. Please identify each and every school and/or school district in the EPZ, if any, which has agreed to meet with LILCO to discuss LILCO's "auxiliary bus driver arrangement" or which has indicated in any way that it is or is not willing to do so. In answering this interrogatory, please specify for each school and/or school district whether a meeting has been or has not been agreed to by each school and/or school district identified.

45. Please identify each and every school district and/or school in the EPZ, if any, which has instructed its school bus drivers to accept training by LILCO or which has indicated that it will or will not so instruct its drivers. In answering this interrogatory, please specify for each school and/or school district whether an instruction to accept LILCO's training has or has not been given.

46. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk

County's Request for Admission No. 20 was denied. Please provide the basis for LILCO's denial of that Request.

47. Please identify each and every school district and/or school in the EPZ, if any, which has agreed to have its school children evacuated during a Shoreham emergency to any reception center identified, or to be identified, by LILCO. Have any school districts and/or schools refused to have their school children evacuated to any such reception centers. If so, please identify.

48. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk County's Request for Admission No. 21 was denied. Please provide the basis for LILCO's denial of that Request.

49. Please identify each and every school district and/or school in the EPZ, if any, which has adopted or approved a plan for the implementation of a single-wave evacuation of school children in the EPZ during a Shoreham emergency.

50. Please identify each and every assumption underlying LILCO's evacuation time estimates concerning the evacuation of school children under LILCO's "auxiliary bus driver arrangement," or some part thereof.

51. In LILCO's February 4, 1988 "Response to Suffolk County's First Set of Requests for Admissions Regarding the Remand Issue of 'Role Conflict' of School Bus Drivers," Suffolk County's Request for Admission No. 23 was denied. Please provide the basis for LILCO's denial of that Request.

52. Is it assumed by LILCO that no LILCO employees serving as "auxiliary," backup or primary bus drivers under LILCO's "auxiliary bus driver arrangement" will experience role conflict during a Shoreham emergency? Is it assumed by LILCO that no such LILCO employees would abandon their LERO jobs or fail to report for duty due to role conflict during a Shoreham emergency? For each of the above, please specify each and every basis of the assumptions made by LILCO, and produce any documents related to such assumptions.

53. Please identify each and every contact or communication in which any person or group has attempted to persuade school districts and/or schools (or representatives or employees of school districts and/or schools) to participate in LILCO's "auxiliary bus driver arrangement" or otherwise to cooperate with LILCO with regard to the evacuation of schools during a Shoreham emergency. Please specify for each such contact and/or communication, the school district or school contacted and the person(s) talked with, the date of each contact or communication, and the substance of each communication or contact. Please produce any documents related to any such contacts or communications.

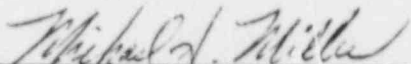
54. Please identify each and every bus company which has been contacted by LILCO with regard to LILCO's "auxiliary bus driver arrangement" concerning the evacuation of schools during a Shoreham emergency. Please specify which such bus companies have declined to participate in LILCO's "auxiliary bus driver arrangement" or have declined to contract with LILCO for the provision of buses. Specify the reasons that each such bus company has declined to participate, and produce any documents related to this interrogatory.

55. To the extent there have been any changes since you have responded to Suffolk County's first set of interrogatories and requests for production of documents, please again respond to Requests 1 through 32 of Suffolk County's First Set of Interrogatories and Requests for Production of Documents to Long Island Lighting Company, dated January 4, 1988.

56. Please identify and provide a copy of any document not already identified in response to the above interrogatories and/or Suffolk County's First Set of Interrogatories and Requests for Production of Documents to Long Island Lighting Company, dated January 4, 1988, on which LILCO intends to rely in support

of its position on the issue of whether there will be a sufficient number of school bus drivers to evacuate schools during a Shoreham emergency.

Respectfully submitted,



Michael S. Miller
J. Lynn Taylor

Attorneys for Suffolk County

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February 5, 1988

DOCKETED
USNPC

February 5, 1988

UNITED STATES OF AMERICA '88 FEB -8 P4:09
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board
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
(Emergency Planning)

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO LONG ISLAND LIGHTING COMPANY have been served on the following this 5th day of February, 1988 by U.S. mail, first class, except as noted:

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