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USNRC
February 17, 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

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|----------------------------------|---|--|
| In the Matter of |) | Docket No. 50-322-OL-3 (Emergency Planning) |
| LONG ISLAND LIGHTING COMPANY |) | |
| (Shoreham Nuclear Power Station, |) | |
| Unit 1) |) | |
| |) | |

SUFFOLK COUNTY'S ANSWERS TO LILCO'S FOURTH SET OF INTERROGATORIES AND DOCUMENT REQUESTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS

On February 1, 1988, LILCO filed its "Fourth Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers to Suffolk County and New York State" ("Fourth Discovery Request"). Pursuant to 10 CFR § 2.740b, Suffolk County (the "County") hereby responds to LILCO's Fourth Discovery Request.

I. GENERAL RESPONSE

A. All documents identified in these Answers will be provided within the time allotted by the NRC's Rules of Practice, to the extent the County does not object to their production.

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B. The County hereby objects to LILCO's interrogatories and document requests to the extent they seek information on documents outside of the possession, custody or control of the County.

C. The County objects to all interrogatories, document requests, definitions, and instructions insofar as they require the disclosure of any information protected by the attorney-client privilege or work product doctrine.

II. ANSWERS TO INTERROGATORIES AND DOCUMENT REQUESTS

LILCO Interrogatory No. 45

45. To the extent there have been any changes since you responded to LILCO's first and second sets of interrogatories and requests for production of documents regarding role conflict of school bus drivers, please respond to Requests 1-7 and 18 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.

Answer

On February 15, Suffolk County supplemented its Answers to LILCO's First Set of Interrogatories and Requests for Production of Documents, dated January 5, 1988. See Second Supplement to Suffolk County's Answers to LILCO's First Set of Interrogatories and Document Requests Regarding Role Conflict of School Bus Drivers, dated February 15, 1988. Should additional information

responsive to this Interrogatory become available, LILCO will be promptly notified and this response will be supplemented accordingly. In addition, LILCO will be promptly provided with any documents responsive to this Interrogatory, including resumes as such documents become available.

LILCO Interrogatory No. 46

46. In particular, for each survey or focus group interview that Professor Cole has done, is doing, or will do in connection with this proceeding, please provide (1) the survey instrument and any drafts of it, (2) the results of the survey, (3) any reports on or analyses of the survey, (4) any tapes or transcripts of the interview, and (5) any reports on or analyses of the interview.

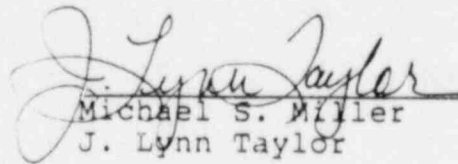
Answer

With the exception of the surveys and focus group interviews conducted by Professor Cole in connection with the emergency planning proceedings of 1983-84 and the Exercise proceedings of 1986-87, Suffolk County states that, to the best of its knowledge, there is no information in existence which is responsive to this Interrogatory. The surveys and focus group interviews conducted by Professor Cole in connection with the emergency planning and Exercise proceedings would not appear to

be within the scope of this Interrogatory. In any event, such information may be found in the record and is therefore as accessible to LILCO as it is to the County.

OBJECTIONS STATED BY COUNSEL

All objections and assertions of privilege, or reference thereto, were stated by counsel.


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Attorneys for Suffolk County

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LONG ISLAND LIGHTING COMPANY) Docket No. 50-322-OL-3
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Unit 1))
_____)

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY'S ANSWERS TO LILCO'S FOURTH SET OF INTERROGATORIES AND DOCUMENT REQUESTS REGARDING ROLE CONFLICT OF SCHOOL BUS DRIVERS have been served on the following this 17th day of February, 1988 by U.S. mail, first class, except as otherwise noted.

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Washington, D.C. 20555

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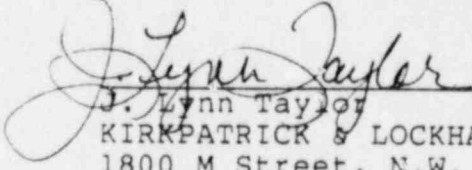
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