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RELATED CORRESPONDENCE

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DATE: February 16, 1988

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before the Atomic Safety and Licensing Board

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

RESPONSE OF THE STATE OF NEW YORK TO LILCO'S  
FOURTH SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS REGARDING ROLE CONFLICT  
OF SCHOOL BUS DRIVERS

This is the State of New York's response to "LILCO's Fourth Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers to Suffolk County and New York State," dated February 1, 1988 ("LILCO's Fourth Set of Interrogatories and Requests").

To the extent that LILCO's Fourth Set of Interrogatories and Requests seeks information and documents of any sort that are not within the possession, custody or control of the State of New York, but, rather within the possession, custody or control of school districts, bus companies or county governments (including Suffolk County), the State of New York objects. School districts, bus companies and county governments are autonomous from the State of New York and are not within the State of New

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York's control. Accordingly, the burden of obtaining such information is the same for LILCO as it is for the State of New York.

To the extent that LILCO's Fourth Set of Interrogatories and Requests seeks information and documents of any sort that are protected against disclosure, for example, by attorney work product doctrine, the State of New York objects.

LILCO Interrogatory No. 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.

Response: As of this time, there have been no such changes.

LILCO Interrogatory No. 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.

Response: This interrogatory is not directed to the State of New York.

Objections Stated by Counsel

Counsel states all objections, assertions of privilege, and answers not requiring verification.



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Fabian G. Halomino  
Richard J. Zahnleuter  
Special Counsel to the Governor

Attorneys for Mario M. Cuomo  
Governor, and the State of New York

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	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the "Response of the State of New York to LILCO's Fourth Set of Interrogatories and Requests for Production of Documents Regarding Role Conflict of School Bus Drivers" have been served on the following this 16th day of February 1988 by U.S. mail, first class, except as noted by asterisks.

Mr. Frederick J. Shon  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Spence W. Perry, Esq.  
William R. Cumming, Esq.  
Office of General Counsel,  
Federal Emergency Management Agency  
500 C Street, S.W., Room 840  
Washington, D.C. 20472

Dr. Jerry R. Kline  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. James P. Gleason, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Anthony F. Earley, Jr., Esq.  
General Counsel  
Long Island Lighting Company  
175 East Old Country Road  
Hicksville, New York 11801

Ms. Elisabeth Taibbi  
Clerk  
Suffolk County Legislature  
Suffolk County Legislature  
Office Building  
Veterans Memorial Highway  
Hauppauge, New York 11788

Mr. L.F. Britt  
Long Island Lighting Company  
Shoreham Nuclear Power Station  
North Country Road  
Wading River, New York 11792

Ms. Nora Bredes  
Executive Director  
Shoreham Opponents Coalition  
195 East Main Street  
Smithtown, New York 11787

Adrian Johnson, Esq.  
New York State Department of Law  
120 Broadway, 3rd Floor  
Room 3-16  
New York, New York 10271

MHB Technical Associates  
1723 Hamilton Avenue  
Suite K  
San Jose, California 95125

E. Thomas Boyle  
Suffolk County Attorney  
Building 158 North County Complex  
Veterans Memorial Highway  
Hauppauge, New York 11788

Mr. Jay Dunkleburger  
New York State Energy Office  
Agency Building #2  
Empire State Plaza  
Albany, New York 12223

Joel Blau, Esq.  
Director, Utility Intervention  
N.Y. Consumer Protection Board  
Suite 1020  
Albany, New York 12210

Mr. Donald P. Irwin  
Hunton & Williams  
707 East Main Street  
P.O. Box 1535  
Richmond, Virginia 23212

Stephen B. Latham, Esq.  
Twomey, Latham & Shea  
33 West Second Street  
Riverhead, New York 11901

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
1717 H Street, N.W.  
Washington, D.C. 20555

Hon. Patrick G. Halpin  
Suffolk County Executive  
H. Lee Dennison Building  
Veterans Memorial Highway  
Hauppauge, New York 11788

Dr. Monroe Schneider  
North Shore Committee  
P.O. Box 231  
Wading River, New York 11792

Lawrence Coe Lanpher, Esq.  
Kirpatrick & Lockhart  
1800 M Street, N.W.  
South Lobby - Ninth Floor  
Washington, D.C. 20036

George Johnson  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555


Mr. James P. Gleason  
Chairman  
Atomic Safety and Licensing Board  
513 Gilmoure Drive  
Silver Spring, MD 20901

Douglas J. Hynes  
Town Board of Oyster Bay  
Town Hall  
Oyster Bay, New York 11771

David A. Brownlee, Esq.  
Kirkpatrick & Lockhart  
1500 Oliver Building  
Pittsburgh, Pennsylvania 15222

Mr. Philip McIntrie  
FEMA  
26 Federal Plaza  
New York, New York 10278

Mr. Stuart Diamond  
Business/Financial  
NEW YORK TIMES  
229 W. 43rd Street  
New York, New York 10036



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Richard J. Zahnleuter, Esq.  
Deputy Special Counsel to  
the Governor  
Executive Chamber  
Capitol, Room 229  
Albany, New York 12224  
(518) 474-1273

\* By Telecopier

\*\* By Federal Express