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March 15, 1988

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FILE NO

DIRECT DIAL NO. 804 788-

Richard J. Zahnleuter, Esq.  
Deputy Special Counsel  
to the Governor  
State Capitol, Room 229  
Albany, New York 12224

BY FEDERAL EXPRESS

Michael S. Miller, Esq.  
Kirkpatrick & Lockhart  
South Lobby - 9th Floor  
1800 M Street, N.W.  
Washington, D.C. 20036-5891

Dear Rick and Michael:

Attached are the completed verification forms that go with LILCO's two March 11 filings: "LILCO's Responses and Objections to Suffolk County's Second Set of Interrogatories and Request for Production of Documents Regarding Emergency Broadcast System" and "LILCO's Supplemental Responses and Objections to Suffolk County's First Set of Interrogatories and Request for Production of Documents Regarding Emergency Broadcast System."

In this connection, I noticed that no such sworn verification statements were included with Suffolk County's answers to LILCO's first set of EBS interrogatories, filed March 9, and New York State's answers to LILCO's first set of interrogatories, filed March 11. As both of you undoubtedly know, interrogatories must be answered "under oath or affirmation"; "the answers shall be signed by the person making them, and the objections by the attorney making them." 10 C.F.R. § 2.740b. Particularly with regard to the State's answers, LILCO is entitled to know who within the New York State government sponsored the answers, a few of which respond substantively to LILCO's interrogatories, in light of the fact that the State has identified no witnesses. Please provide such sworn statements to me at your earliest opportunity.

Very truly yours,

8803230056 880315  
PDR ADCK 05000322  
G PDR

*Scott*  
Scott D. Matchett

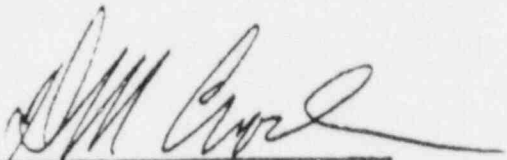
Attachments

cc: Service List (w/ attachments)

DS03

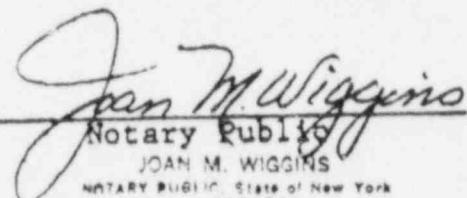
VERIFICATION

Douglas M. Crocker, being first duly sworn on oath, deposes and says: that he is currently the Manager, Nuclear Emergency Preparedness, Nuclear Operations Support Department for Long Island Lighting Company; that he has personal knowledge of a portion of the subject matter of this litigation; that responsible corporate employees have provided him with additional facts necessary to provide the information contained in the foregoing Answers to Interrogatories; that he has read the answers, and knows the contents thereof; and that based upon such information of which he has personal knowledge and with which he has been provided, he is informed and believes the matters stated therein to be true, and on these grounds alleges that the matters stated therein are true and therefore verifies the foregoing on behalf of Long Island Lighting Company.

  
\_\_\_\_\_  
Douglas M. Crocker

State of New York            SS:

I, Joan M. Wiggins, a Notary Public in and for the jurisdiction aforesaid, hereby certify that Douglas M. Crocker whose name is signed to the foregoing Answers to Interrogatories, dated Mar 15, 1988, has personally sworn before me that the statements therein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Notary Public  
JOAN M. WIGGINS  
NOTARY PUBLIC, State of New York  
No. 4859591  
Qualified in Nassau County  
Commission Expires September 15, 1988

My Commission expires: 9/15/88

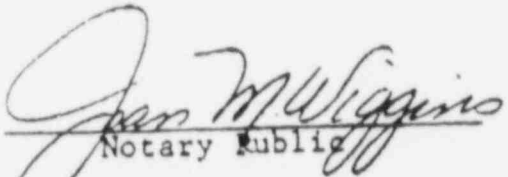
VERIFICATION

Douglas M. Crocker, being first duly sworn on oath, deposes and says: that he is currently the Manager, Nuclear Emergency Preparedness, Nuclear Operations Support Department for Long Island Lighting Company; that he has personal knowledge of a portion of the subject matter of this litigation; that responsible corporate employees have provided him with additional facts necessary to provide the information contained in the foregoing Answers to Interrogatories; that he has read the answers, and knows the contents thereof; and that based upon such information of which he has personal knowledge and with which he has been provided, he is informed and believes the matters stated therein to be true, and on these grounds alleges that the matters stated therein are true and therefore verifies the foregoing on behalf of Long Island Lighting Company.

  
\_\_\_\_\_  
Douglas M. Crocker

State of New York                      SS:

I, Joan M. Wiggins, a Notary Public in and for the jurisdiction aforesaid, hereby certify that Douglas M. Crocker, whose name is signed to the foregoing Answers to Interrogatories, dated 3/15, 1988, has personally sworn before me that the statements therein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Notary Public

JOAN M. WIGGINS  
NOTARY PUBLIC, State of New York  
No. 4859591  
Qualified in Nassau County  
Commission Expires September 15, 1988

My Commission expires: 9/15/88