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DOCKETED  
USNRC

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June 29, 1983

FILE NO 24566.000003  
DIRECT DIAL NO 804-788-8552

BY TELECOPY

Karla J. Letsche, Esq.  
Kirkpatrick, Lockhart, Hill,  
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1900 M. Street, N.W.  
Washington, D.C. 20036

Informal Discovery Requests

Dear Tip:

LILCO's Informal Discovery Requests aimed at clarifying some questions we had concerning Suffolk County's, SOC's, and the Town of Southampton's contentions are being "beamed up" to you this afternoon via our talking computers. We have provided references to the Contentions for your convenience.

We would appreciate receiving responses to these informal discovery requests at your earliest convenience, but no later than July 15, 1983. To facilitate your response, you need not send all your responsive materials at the same time; please feel free to send responsive documents, etc. as soon as they become available. As we have done for you in the past, we would urge you to identify the question or questions to which each document is responsive.

Please do not hesitate to call me if you have any questions about these or any other discovery matters.

Sincerely,

*Jessine A. Monaghan*  
Jessine A. Monaghan  
NUCLEAR REGULATORY COMMISSION

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PDR ADCK 05000322  
PDR  
Q

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Enclosure

- cc: Edward M. Barrett, Esq.  
Ira L. Freilicher, Esq.  
Mr. John A. Weismantle  
Mr. Brian R. McCaffrey  
Mr. Charles A. Daverio  
Mr. Anthony M. Callendrello  
W. Taylor Reveley, III, Esq.  
James A. Christman, Esq.

Docket No. 50-322-a-3 Official Ex. No. 27  
In the matter of Shoreham  
Searched \_\_\_\_\_ IDENTIFIED   
Assigned  RECEIVED   
Indexed \_\_\_\_\_ REJECTED \_\_\_\_\_  
DATE 7-12-88  
Other Done

## INFORMAL DISCOVERY REQUESTS

For the purposes of this request "document" shall mean and include reports, summaries, notes, surveys, analyses, studies, tests and writings of every description including, but not limited to, drawings, graphs, charts, photographs, videotapes, magnetic tapes, computer tapes and print-outs and other data from which information can be obtained and translated, including tab runs and survey questionnaires.

### I. Suffolk County Contentions

#### SC Contention 1: Command and Control

##### 1. SC1- A

For each of the following activities listed in Contention 1, state specifically which cases, statutes, regulations, ordinances or other provisions of law on which you rely for the statement "New York law explicitly prohibits several of the actions which LILCO proposes to take under the Transition Plan.":

1. directing traffic
2. blocking roadways
3. setting up barriers in roadways, or channeling traffic
4. posting traffic signs on roadways
5. removing obstructions from public roadways, including the towing of private vehicles
6. activating sirens and directing the broadcast of emergency broadcast system messages.
7. making decisions and official recommendations to the public as to the appropriate actions necessary to protect the public health and safety, including directing an evacuation and/or special facilities, prohibiting traffic, milk and dairy

#### IV. Miscellaneous

102. Are there any local emergency evacuation plans or similar local plans drafted by Suffolk County, any village or any town, for Brookhaven National Laboratory, Millstone, or Connecticut Yankee? If such plans do exist, please provide copies. If no such plans exist, please explain why Suffolk County does not consider such plans to be necessary.
103. If emergency planning is deemed by the NRC to be possible for Long Island and a plan is approved by the NRC, will Suffolk County or any of Suffolk County's officials take action to prohibit county employees from responding in an emergency other than by appealing the NRC's decision to the courts?
104. If emergency planning is deemed by the NRC to be possible and a plan is approved by the NRC, will the County adopt regulations, ordinances, or provide LILCO with a permit to conduct any of the activities necessary to execute the emergency plan which the County, in its contentions, has classified as illegal?
105. Provide copies of all documents and information communicated, submitted or provided to Governor Cuomo's Shoreham Commission, to any member of that Commission or to any staff personnel affiliated with that Commission by Suffolk County, its consultants or its agents.
106. Provide copies of the notes and slides of the speakers who made oral remarks or statements to Governor Cuomo's Shoreham Commission on June 28, 1983, plus any other documents that the County speakers drafted or had drafted in preparation for the County's presentation to the Commission.
107. Provide a copy of the remarks or statement that Peter Cohalan, Suffolk County Executive, read as part of the County's presentation to Governor Cuomo's Shoreham Commission on June 28, 1983.