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USNRC

HUNTON & WILLIAMS

707 EAST MAIN STREET

P O BOX 1535

'88 AUG 11 P5:51

RICHMOND, VIRGINIA 23212

TELEPHONE 804-788-8200

OFFICE OF RE
DOCKETING &
BRAN

1919 PENNSYLVANIA AVENUE, N
P O BOX 9230
WASHINGTON, D C 20036
202-223-8650

88 & 7 BUILDING
P O BOX 109
RALEIGH, NORTH CAROLINA 27602
919-628-9371

FIRST VIRGINIA BANK TOWER
P O BOX 3668
NORFOLK, VIRGINIA 23514
804-625-5501

July 21, 1983

FILE NO 24566.0000
DIRECT DIAL NO. 804-788-85

John E. Birkenheier, Esq.
Kirkpatrick, Lockhart, Hill,
Christopher & Phillips
1900 M Street, N.W.
Washington, D.C. 20036

Informal Discovery Requests
of July 21, 1983

Dear John:

Enclosed are some informal discovery requests. We would appreciate receiving your responses at your earliest convenience. I invite you to telephone me right away if there are any problems with this request.

Sincerely,

Jessie A. Monaghan
Jessie A. Monaghan

293/668

Enclosure

cc: Stephen B. Latham, Esq.
James B. Dougherty, Esq.
David A. Repka, Esq.
Ralph Shapiro, Esq.

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PDR ADOCK 05000322
G PDR

bc: Edward M. Barrett, Esq.
Ira L. Freilicher, Esq.
Mr. John A. Weismantle
Mr. Brian R. McCaffrey
Mr. J. P. Carney
Mr. Charles A. Daverio
Mr. Anthony M. Callendrello
W. Taylor Reveley, III, Esq.
James N. Christman, Esq.
Kathy E. B. McCleskey, Esq.
Ms. Sharon Separ

NUCLEAR REGULATORY COMMISSION

Docket No. 50-322-a-3 Official Ex. No. 28
In the matter of Shoreham
Staff _____ IDENTIFIED
Applicant ✓ RECEIVED
Intervenor _____ REJECTED _____
Cont'g Dir's _____
Contractor _____ DATE 7-12-88
Other _____ Witness _____
Re: order Shore

Informal Discovery Requests
of July 21, 1983

For the purposes of set of requests, "document" shall mean and include reports, summaries, notes, surveys, analyses, studies, tests, memoranda, correspondence, letters, telegrams, telexes, cables and writings of every description including but not limited to, drawings, graphs, charts, photographs, films, videotapes, magnetic tapes, computer tapes and printouts, and other data from which information can be obtained and translated, including tab runs and survey questionnaires.

As used herein, the singular of any word or phrase includes the plural and the plural includes the singular.

Documents produced in response to this request shall be organized and labeled to correspond with this set of requests.

If any documents covered by this request are withheld under a claim of privilege, furnish a list specifying each document for which privilege is claimed, together with the following information as to each such document: the author(s); the name and job title of each recipient and person to whom the document or a copy thereof was furnished; the date; the subject matter of the document; the basis on which the privilege is claimed; and the paragraph of this request to which each such document is responsive.

1. Any correspondence from (or to) Andrew Kanen to (or from) members of the Suffolk County Emergency Plan Steering Committee or other County officials, employees, or counsel that relate to emergency planning including, but not limited to, any

documents that discuss the relative strengths or weakness of the roads of Long Island (or Suffolk County or any part of Suffolk County) as compared to roadways in other parts of the country or the world.

2. Any documents regarding the size of the plume pathway emergency planning zone, including, but not limited to, documents addressing or discussing how large the EPZ should be and how the decision to make it a certain size was made.

3. Any documents addressing the question of whether County personnel or other people who might be needed to perform emergency functions will perform their duties in an emergency, or whether for some reason (for example, role conflict or fear for their own safety), they will fail to perform their duties or delay in performing them.

4. Any documents addressing the likely reactions of the public to information about a nuclear accident at the Shoreham plant or addressing the reactions of people in general to nuclear accidents including, but not limited to, documents discussing whether members of the public will or will not follow instructions from governments or utilities.

5. All testimony on emergency planning given by any Suffolk County's consultants, officials, employees or representatives in any proceeding, be it administrative, legislative or jurisdictional. The term proceeding in this request shall include all proceedings before Governor Cuomo's Shoreham Commission.

6. All documents, articles, papers or other publications pertaining to emergency planning, authored or co-authored by any of Suffolk County's consultants, officials, employees, or representatives.

7. All documents analyzing, studying or otherwise pertaining to procedures that might be used to notify those within the EPZ who are deaf or hard of hearing.

8. All documents analyzing, studying or otherwise pertaining to the traffic or radiological conditions that might exist during a radiological emergency.

9. All documents analyzing, studying or otherwise pertaining to the various protective actions available for the plume exposure pathway EPZ during emergency conditions, and the bases for choosing one of those actions.

10. All documents analyzing, studying or otherwise pertaining to evacuation time estimate studies for Long Island.

11. All documents analyzing, studying or otherwise pertaining to analyses, studies or surveys regarding the voluntary evacuation, shadow effect or other actions by people outside the EPZ.

12. All documents identifying, analyzing, studying or otherwise pertaining to the possibility that LILCO and non-LILCO personnel expected to report to the site for emergency duty would fail to report (or to report in a timely manner) because of conflicting family or other duties that would arise in the event of a radiological emergency.

13. All documents analyzing, studying or otherwise pertaining to public education programs to inform the population potentially effected by a radiological emergency of the initial and subsequent actions to be taken in the event of a radiological emergency.

14. All documents regarding the particular social and psychological profile of Suffolk County's residents and the probable response of particular groups, such as the economically disadvantaged to various educational programs.

15. All documents analyzing, studying or otherwise pertaining to a PRA consequence analysis applicable to Shoreham.

16. All documents detailing, analyzing, studying or otherwise pertaining to the best methods for prompt notification of any boats within the EPC.

17. All documents pertaining to or analyzing the relative merits of various means of providing public information to ensure preparedness to respond to a radiological emergency.

18. All documents analyzing, studying or otherwise pertaining to the most effective method to inform the transient or permanent population or both within Suffolk County of the protective actions needed to be taken in the event of a radiological emergency at Shoreham.

19. All documents studying, analyzing, or otherwise pertaining to possible obstacles such as impassible roadways due to evacuation or adverse environmental conditions, that

might prevent field monitoring teams from reaching the offsite monitors.

20. All documents pertaining to consequence analysis studies that reflect the potential consequences of a serious radiological emergency at Shoreham.

21. All documents pertaining to the County's organization for coping with emergencies that do not involve nuclear power.

22. All documents pertaining to the County's procedures for coping with emergencies that do not involve nuclear power.

23. All documents analyzing, studying, critiquing, or pertaining to the County's plan or plans for dealing with emergencies that do not involve nuclear power.

24. All documents relied upon in preparing the County's plan or plans for dealing with emergencies that do not involve nuclear power.

25. All documents indicating the division of responsibility for preparing the County's plan or plans for dealing with emergencies that do not involve nuclear power, the schedule by which the plan or plans were to be completed, and the persons, if any, who received the plan or plans.

26. All documents pertaining to the County's organization and procedures for coping with emergencies involving the Brookhaven National Laboratory.

27. All documents analyzing, studying, critiquing, or pertaining to the County's plan for dealing with emergencies that involve the Brookhaven National Laboratory.

28. All documents indicating the division of responsibility for preparing the County's plan for dealing with emergencies that involve the Brookhaven National Laboratory, the schedule by which the plan was to be completed, and the persons, if any, who reviewed the plan.

29. All other documents pertaining to emergency planning for emergencies involving the Brookhaven National Laboratory.

30. All documents pertaining to the County's organization and procedures for coping with emergencies involving the Millstone Point Nuclear Power Station.

31. All documents analyzing, studying, critiquing, or pertaining to the County's plan for dealing with emergencies involving the Millstone Point Nuclear Power Plant.

32. All documents indicating the division of responsibility for preparing the County's plan for dealing with emergencies involving the Millstone Point Nuclear Power Station, the schedule by which the plan was to be completed, and the persons, if any, who reviewed the plan.

33. All documents reflecting any meetings or contacts involving Suffolk County's officers, personnel, contractors, subcontractors, consultants or other representatives and pertaining to emergency planning.