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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
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| In the Matter of | |) |
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| LONG ISLAND LIGHTING COMPANY | |) |
| | |) |
| (Shoreham Nuclear Power Station, | |) |
| Unit 1) | |) |
| _____ | |) |

Docket No. 50-322-OL-3
(Emergency Planning)

GOVERNMENTS' ANSWERS AND ADDITIONAL OBJECTIONS
TO LILCO'S SECOND SET OF INTERROGATORIES
REGARDING CONTENTIONS 1-2, 4-8, AND 10

Pursuant to 10 CFR § 2.740b(b), and in accordance with this Board's oral ruling of April 11 and Confirmatory Memorandum and Order of April 12, Suffolk County, the State of New York and the Town of Southampton (the "Governments") hereby answer LILCO's Second Set of Interrogatories Regarding Contentions 1-2, 4-8, and 10 (March 24, 1988) ("Interrogatories").

The Governments' objections to LILCO's Interrogatories were served on April 20. This Answer contains additional objections to some of the Interrogatories, but answers are nevertheless provided. Many of the answers herein reference the Governments' Objection to Portions of February 29 and April 8 Orders In the Realism Remand and Offer of Proof (April 13, 1988) (hereafter, "April 13 Objection and Offer of Proof"). The April 13 Objection and Offer of Proof sets forth the Governments' intended testimony

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on the matters at issue in this proceeding (except on immateriality) and is as complete a statement of the Governments' intentions, with respect to a "best efforts" response to a Shoreham emergency, as they are able to provide.

Answers and Objections

LILCO Interrogatory No. 9

9. With respect to the Contention 5 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Answer to Interrogatory No. 9.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments would not follow LILCO's Plan.

LILCO Interrogatory No. 10

10. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means by which New York State and Suffolk County emergency response personnel would be notified of a radiological emergency at Shoreham. Specifically, in Intervenor's Answer to LILCO's Motion for Summary Disposition of Contentions 5 and 6 (Feb. 10, 1988) (hereinafter "Answer to 5 and 6 Motion") on page 22 Intervenor's state that "the issues presented by LILCO's realism defense to Contentions 5 and 6, CLI-86-13, and the new rule require this Board to determine how the Governments would respond in an emergency" and that "the Board's inquiry must focus" on certain matters, which you then list. With respect to these matters, in your response to this interrogatory please include answers to the following questions which Intervenor's raised:

- a. How would the State learn of a Shoreham accident?
(Answer to 5 and 6 Motion at 22.)
- b. How long would it take New York and Suffolk County to "react to a call from LILCO reporting that there had been an accident at Shoreham?" (Id.)

- c. Whom would the person or persons receiving the call in turn have to contact? How would those contacts be made and how long would such contacts take? (Id. at 22-23).

Answer to Interrogatory No. 10.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, nor have they otherwise trained or planned for responding to a Shoreham emergency. Accordingly, beyond stating that they would exercise their best judgment at the time of the accident, the Governments do not know how or when they would learn of a Shoreham accident, whether they would receive a call from LILCO, who would receive a call (if one were to be received), or how long any contacts might take. Suffolk County notes that, as stated by Mr. Halpin during his deposition, neither he nor his top deputies regularly carries a "beeper" or other similar device. Thus, while Mr. Halpin, as County Executive, would be the person in charge of any County action, it is not clear whether Mr. Halpin could be contacted at any particular time or how long contacting him might take.

LILCO Interrogatory No. 11

11. To the extent not already provided in your response to Interrogatory No. 10, please answer the following questions with respect to the RECS lines to State offices:

- a. What is required to make the existing Shoreham RECS lines to the State "operational" and "capable of functioning?" (See Affidavit of James D. Papile, May 11, 1987, at 3 ¶ 4).
- b. If Shoreham were to operate at 100% power, would the State permit the RECS lines to be made operational?

- c. Precisely how far is the nearest Shoreham RECS line drop from each of the following offices:
- (i) REPG in Albany
 - (ii) the State Police Communications Center in Albany
 - (iii) the State EOC in Albany
 - (iv) the SEMO district office in Poughkeepsie?
- d. Will the State permit LILCO, at LILCO's expense, to relocate the RECS lines to each of the above four locations?
- e. Will the State permit LILCO, at LILCO's expense, to relocate the RECS lines to each of the above four locations if Shoreham were licensed to operate at 100 percent power?

Answer to Interrogatory No. 11.

a. The "Shoreham RECS Lines to the State" referred to in this Interrogatory protrude from the walls in the various locations and terminate as bare, dangling wires. What is required to make the lines operational is uncertain. Certainly, at a minimum, they would need to be connected to telephones. Whether this would be sufficient to make them operational is unknown because the system has not been in service for years and it could be non-operational or might malfunction for any number of reasons.

b,d, and e. The State objects to these Interrogatories on the ground that they call for speculation. Notwithstanding this objection, the State answers that, for the reasons set forth in the April 13 Objection and Offer of Proof, the State has not adopted any plan for Shoreham and will not cooperate with LILCO in developing or implementing any emergency plan or response.

Beyond these facts, the State is unable to provide any further information. The County is unable to respond to these Interrogatories which are directed to the State.

c. The State objects to this Interrogatory on the ground that the term "Shoreham RECS line drop" is vague. Notwithstanding this objection, the State answers that the wires referenced above: (i) located closest to REPG in Albany protrude from a wall in a non-REPG office that is approximately 50 yards, through corridors, from the REPG office; (ii) located closest to the State Police Communications Center in Albany protrude from a wall in unrelated offices two floors away; (iii) located closest to the State EOC in Albany protrude from a wall in the State EOC; and (iv) located closest to the SEMO district office in Poughkeepsie protrude from a wall in that office.

LILCO Interrogatory No. 12

12. To the extent not already provided in your response to Interrogatory No. 10, please answer the following:

- a. Identify and describe any and all procedures, methods, and means by which the Governor of New York and the Suffolk County Executive can be contacted or paged 24 hours a day. Identify those persons who have control of or access to those means of contact and describe how those persons can be contacted 24 hours a day.
- b. If for any reason the Governor of New York could not be contacted or was otherwise not available to respond to a radiological emergency at Shoreham, who would be responsible for performing the Governor's duties in the Governor's absence? How would that person be contacted and informed of a radiological emergency at Shoreham?

- c. If for any reason the Suffolk County Executive could not be contacted or was otherwise not available to respond to a radiological emergency at Shoreham, who would be responsible for performing the Suffolk County Executive's duties in the county Executive's absence? How would that person be contacted and informed of a radiological emergency at Shoreham?

Answer to Interrogatory No. 12.

The Governments object to this Interrogatory to the extent it calls for speculation about who would be contacted, and how they would be contacted, in a Shoreham emergency. See April 13 Objection and Offer of Proof. Notwithstanding this objection, see Answer to Interrogatory No. 10. In addition, the County attaches herewith a document regarding SCPD procedures for contacting members of the County Executive's staff "in the event of a newsworthy or major incident." The State also notes in response to this Interrogatory that pursuant to Sections 24(1) and 28 of the Executive law, only a local chief executive may request a "declaration of disaster emergency" from the Governor. Therefore, the relevant "procedure, method and means" by which the Governor can be contacted in a radiological emergency include contact by a local chief executive.

LILCO Interrogatory No. 13

13. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in activating the early warning siren system in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenors raised in their Answer to 5 and 6 Motion at 23:

- a. Who from New York State and Suffolk County would need to be consulted in connection with a decision concerning when or how to activate the sirens? (Answer to 5 and 6 Motion at 23.)
- b. How would such consultations take place and how long would they take? (Id.)
- c. Who would make the decisions as to when and how to activate the sirens? (Id.)
- d. What "data, information, and criteria" would be "needed, desired, consulted or relied upon" by the person or persons responsible for determining when to activate the sirens and how to do so? (Id.)
- e. Who would "implement" the decision to activate the sirens? (Id.)
- f. How long would it take to "implement" the decision to activate the sirens? (Id.)

Answer to Interrogatory No. 13.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. Suffolk County also notes that Mr. Halpin testified during his deposition that he does not intend to use LILCO's siren system and thus the assumed basis for this Interrogatory is not accurate. The State notes further that the LILCO Plan does not assume a role for the State in siren activation and thus there is no basis for the Interrogatory to the extent it is directed to the State.

LILCO Interrogatory No. 14

14. To the extent not already provided in your response to Interrogatory No. 13, please answer the following:

- a. Assuming that the public in the Shoreham 10-mile EPZ needed to be alerted quickly to the existence of a Shoreham radiological emergency, would the State and County allow the existing sirens to be sounded?
- b. Is your answer the same if the State and County also assume that a public education brochure has been distributed annually throughout the EPZ telling people that they should tune their radios to the EBS when they hear sirens?

Answer to Interrogatory No. 14.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. The State and County also object to subpart (b) because it assumes a fact (distribution of the brochure) that cannot occur since LILCO lacks legal authority to distribute such a brochure.

LILCO Interrogatory No. 15

15. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in activating an Emergency Broadcast System (EBS) in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 23:

- a. Who would have to be "contacted" in connection with making a decision whether to activate an EBS? (Answer to 5 and 6 Motion at 23.)
- b. How would those "contacts" be made and how long would it take to make such "contacts?" (Id.)
- c. Who would need to be "consulted in connection with a decision concerning when or how to activate an EBS"? How would those "consultations" take place and how long would they take? (Id.)
- d. Who would make the decisions as to when or how to activate an EBS? (Id.)
- e. What "data, information, and criteria" would be "needed, desired, consulted, or relied upon" by the person or persons responsible for deciding when or how to activate an EBS? (Id.)
- f. Who would "implement" the decision to activate an EBS? (Id.)
- g. How long would it take to "implement" the decision to activate an EBS? (Id.)
- h. What EBS would be chosen for use by New York State and Suffolk County? (Id.)

Answer to Interrogatory No. 15.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. Mr. Halpin similarly made clear at his April 19 deposition that since the County has no plan for taking these actions, he could not respond to similar questions because he does not know the answer.

LILCO Interrogatory No. 16

16. Unless the answer to Interrogatory No. 9 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in preparing and broadcasting EBS messages in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenors raised in their Answer to 5 and 6 Motion at 24:

- a. Who would be responsible for determining the contents of EBS messages? (Answer to 5 and 6 Motion at 24.)
- b. What "criteria" would be used in determining the contents of EBS messages? (Id.)
- c. Who would be responsible for drafting EBS messages and how long would this drafting process take? (Id.)
- d. Who would be responsible for approving EBS messages and how long would this approval process take? (Id.)
- e. Who would broadcast EBS messages? (Id.)
- f. How would the broadcasts of EBS messages be made and how often would they be made (Id.)

Answer to Interrogatory No. 16.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 17

17. To the extent not provided in your response to Interrogatory No. 16, please answer the following:

- a. Would the State and County use prewritten messages as much as possible, rather than writing new ones from scratch at the time of the emergency? If so, where are the prewritten messages to be found?

- b. If it were necessary to get a message to the public immediately advising them to shelter or evacuate, would the State and County consider broadcasting one of the messages in LILCO's emergency plan?

Answer to Interrogatory No. 17.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. The Governments state further in response to subpart b that, consistent with the testimony of Mr. Halpin and Dr. Axelrod, they will not use LILCO's Plan.

LILCO Interrogatory No. 18

18. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 5 functions. Please provide copies of all such plans and procedures.

Answer to Interrogatory No. 18.

No such plans and procedures have been identified or exist.

LILCO Interrogatory No. 19

19. Please state each and every reason why Intervenors believe that their implementation of the Contention 5 functions as described in their responses in Interrogatories Nos. 10, 13, 15, 16, and 17 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenors claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Answer to Interrogatory No. 19.

As the Governments stated in response to the referenced contentions, they cannot speculate on what their response might be. Following the LILCO Plan would not be their "best efforts" because, for the reasons stated in the Governments' April 13 Objection and Offer of Proof, the Governments do not believe the LILCO Plan will protect the public and do not believe it can be successfully implemented. The Governments, consistent with their responsibilities to their citizens, could not use LILCO's plan which they have found to be independent. The Governments' ad hoc best effort response would not be adequate under NRC regulations for the reasons identified in the April 13 Objection and Offer of Proof.

LILCO Interrogatory No. 20

20. With respect to the Contention 6 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Answer to Interrogatory No. 20.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments will not follow LILCO's Plan.

LILCO Interrogatory No. 21

21. Unless the answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, and means which New York State and Suffolk County would use, undertake, or employ in determining, deriving, or deciding upon protective action recommendations in the event of a radiological emergency at Shoreham. Specifically, in your response to this interrogatory please include answers to the following questions which Intervenors raised in their Answer to 5 and 6 Motion at 24:

- a. Who would be responsible for determining, deriving, or deciding upon protective action recommendations? (Id.)
- b. How long would it take to locate the person or persons responsible for determining protective action recommendations and to provide those persons with "information" they believed "necessary and appropriate?" (Id.)
- c. What "information" would the person or persons responsible for determining protective action recommendations require in order to determine protective action recommendations, and how would they obtain that "information?" (Id.)
- d. What "criteria" would be used in determining protective action recommendations, and "how would those criteria be applied to information actually available in an emergency?" How long would this "process" take, and who would "perform" it? (Id.)

Answer to Interrogatory No. 21.

With respect to the State of New York, the Governor would ultimately be responsible for deciding upon protective action recommendations. With respect to Suffolk County, the County Executive would ultimately be responsible for deciding upon protective action recommendations. Beyond these responses, the Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding his objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 22

22. Unless the answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, or means which New York State and Suffolk County would use, undertake, or employ in order to assume and exercise command and control of an emergency response to a radiological emergency at Shoreham.

Specifically, in your response to this interrogatory please include answers to the following questions which Intervenor raised in their Answer to 5 and 6 Motion at 24:

- a. Who would be responsible for assuming and exercising command and control of the emergency response? (Answer to 5 and 6 Motion at 24.)
- b. How long would it take to locate the person or persons responsible for assuming and exercising command and control of the emergency response and to provide those persons with "information" they believed "necessary and appropriate?" (Id.)
- c. What "information" would the person or persons responsible for assuming and exercising command and control of the emergency response require in order to assume and exercise command and control, and how would they obtain that "information?" (Id.)

Answer to Interrogatory No. 22.

With respect to the State of New York, the Governor would ultimately be responsible for assuming command and control of the emergency response. With respect to Suffolk County, the County Executive would ultimately be responsible for the emergency response. Beyond these responses, the Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan as trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 23

23. Unless your answer to Interrogatory No. 20 is a simple no, please identify and describe the processes, methods, or means which New York State and Suffolk County would use, undertake, or employ in order to manage, implement, and coordinate an emergency response to a radiological emergency at Shoreham. Specifically,

in your response to this interrogatory please include answers to the following questions which Intervenor's raised in their Answer to 5 and 6 Motion at 24-25:

- a. Who would be responsible for managing, implementing, and coordinating the emergency response? (Answer to 5 and 6 Motion at 24.)
- b. How long would it take to locate the person or persons responsible for managing, implementing, and coordinating the emergency response and to provide those persons with "information" they believe "necessary and appropriate?" (Id.)
- c. What "information" would the person or persons responsible for managing, implementing, and coordinating the emergency response require in order to perform those functions, and how would they obtain that information? (Id.)
- d. What "functions" would need to be managed, implemented, and coordinated during the emergency response? What "personnel" would need to be managed and coordinated during the emergency response? (Id. at 24-25.)
- e. How would those persons responsible for managing, implementing, and coordinating the emergency response contact and communicate with all "necessary personnel" during the emergency response? How long would it take to establish that contact and perform those communications? (Id. at 25.)

Answer to Interrogatory No. 23.

The Governor and County Executive would ultimately be responsible for managing, implementing and coordinating any response. The Governments object to the remainder of this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 24

24. Suffolk County and the State of New York have admitted that they would attempt to stay in contact with LILCO or LERO or both during a Shoreham emergency (LILCO's Statement of Material Facts, Mar. 20, 1987, ¶ 46). To the extent not already provided in your responses to Interrogatories No. 21-23 above, please answer the following:

- a. How would the County attempt to stay in contact?
- b. How would the State attempt to stay in contact?

Answer to Interrogatory No. 24.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that they do not know how they would attempt to stay in contact with LILCO. It would necessarily depend upon multiple factors, such as LILCO's role in causing the disaster. For the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 25

25. To the extent not already provided in your responses to Interrogatories Nos. 21-23 above, please answer the following questions with respect to the criteria the State and County would use to make protective action determinations for the plume exposure pathway (10-mile) EP2:

- a. What criteria would be used to decide whether the public should evacuate?
- b. What criteria would be used to decide whether the public should shelter?
- c. Would the State and County use EPA's Protective Action Guidelines to make protective action recommendations?

- d. Would the State use different criteria from the ones it would use for radiological emergencies at other nuclear plants? If so, please specify how the Shoreham criteria would differ.

Answer to Interrogatory No. 25.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 26

26. To the extent not already provided in your responses to other of these Interrogatories, please identify what criteria and standards the State and County would use to make protective action recommendations for the ingestion exposure pathway (50-mile) EPZ.

Answer to Interrogatory No. 26.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 27

27. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 6 functions. Please provide copies of all such plans and procedures.

Answer to Interrogatory No. 27.

None has been identified or exists.

LILCO Interrogatory No. 28

28. Please state each and every reason why Intervenor believe that their implementation of the Contention 6 functions as described in their responses to Interrogatory Nos. 21-25 above would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenor claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Answer to Interrogatory No. 28.

See Answer to Interrogatory No. 19.

LILCO Interrogatory No. 29

29. With respect to the Contentions 1 and 2 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Answer to Interrogatory No. 29.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments will not follow LILCO's Plan.

LILCO Interrogatory No. 30

30. Unless the answer to Interrogatory No. 29 is a simple no, please identify and describe the traffic control plans, strategies or techniques which the Suffolk County Police Department (SCPD) would implement during the evacuation of all or a portion of the EPZ in the event of a radiological emergency at Shoreham. Specifically, in Intervenor's Response in Opposition to LILCO's Motion for Summary Disposition of Contentions 1 and 2 (Feb. 10, 1988) (hereinafter "Response to 1 and 2 Motion") at 46-47 Intervenor state that "there are issues of fact regarding the nature and adequacy of a governmental 'best efforts' attempt at traffic control" and that "[a]mong the questions which must be addressed" are certain matters, which Intervenor then list. In your response to this interrogatory please include answers to the following questions which Intervenor raised in their Response to 1 and 2 Motion at 46-47:

- a. What would be the "level of preparedness" of the SCPD and "relevant" County officials in attempting to implement traffic control? (Response to 1 and 2 Motion at 46.)
- b. What specific traffic control strategies would the SCPD implement and how would they be implemented? How long would it take to implement those strategies? (Id. at 47.)
- c. How many SCPD personnel would be required to implement the strategies identified in sub-part b above? How long would it take to mobilize sufficient SCPD personnel to implement the strategies identified in sub-part b above? (Id.)
- d. Could Suffolk County "coordinate" with "other response organizations?" Would Suffolk County "coordinate" with "other response organizations?" If so, what other response organizations" would it "coordinate" with? How would the County and these "other response organizations" would it "coordinate" with? How would the County and these "other response organizations" coordinate?" (Id.)

Answer to Interrogatory No. 30.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or otherwise trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. The County can state, however, that in response to subpart a, there would no level of preparedness, since Suffolk County has determined not to adopt, test, or implement any plan for Shoreham.

LILCO Interrogatory No. 31

31. The traffic posts and traffic movements to be encouraged and discouraged under the LILCO emergency plan are found in OPIP 3.6.3, Attachment 4. To the extent not already answered in your response to Interrogatory No. 30, please answer the following:

- a. Would Suffolk County and the State of New York send personnel to the posts listed in OPIP 3.6.3 if an evacuation of the Shoreham 10-mile EPZ were necessary?
- b. If not, which of the listed posts would not be manned, and which additional posts (not listed in OPIP 3.6.3) would be manned?
- c. Who would the State and County use to man the traffic posts identified in response to a and b above?
- d. In what order would the State and County dispatch police (or other personnel) to the traffic posts? For example, would the State and County try to man the posts in the order listed in Attachment 7 to OPIP 3.6.3, or randomly, or accordingly to which police units were nearest which posts, or some other way? If "some other way," please describe it.
- e. How long would it take for the traffic posts to be fully manned by the State and County?
- f. Would the people manning the traffic posts for the State and County use the traffic control strategies (that is, the movements to be encouraged and discouraged and the channelization and traffic barrier placement) called for in the LILCO Plan? Which would the State and County use and which would the State and County not use?
- g. What traffic control measures would the State and County perform that are not called for in the LILCO Plan?
- h. If traffic were directed in accordance with your answers to b, f, and g above, would the evacuation times be greater than, less than, or the same as the evacuation times if the LILCO Plan were followed?
- i. Assuming LILCO Traffic Guides were stationed at traffic posts listed in OPIP 3.6.3, would Suffolk County traffic personnel (i) ignore them, (ii) send them away, (iii) use them as a source of information or help as needed, or (iv) something else? If the answer is something else, please specify what.

Answer to Interrogatory No. 31.

With respect to subpart a, the answer is no for the reasons set forth in the Governments' April 13 Objection and Offer of Proof. Subparts b-f are therefore without basis. With respect to subpart i, the Governments would neither follow the advice of LILCO's Traffic Guides, nor permit them to direct traffic, which they have no authority to do. The Governments also object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 32

32. To the extent not already provided in your response to Interrogatory No. 30 above, please answer the following. If the answer differs for different times of the day or week, please answer for each time:

- a. How many uniformed police offices does Suffolk County employ? How many are on duty at any give time?
- b. How many police vehicles driven by uniformed officers are on duty in Suffolk County at any given time?
- c. How many New York State Police vehicles driven by uniformed officers are on duty in Suffolk County at any given time?

Answer to Interrogatory No. 32.

- a. The County employs 2,615 police employees, both uniformed and non-uniformed. Of these, 1,740 are dedicated to the patrol division in patrol, supervisory and administrative positions. At any given time,

approximately 185 uniformed officers are assigned to vehicles for patrol, Expressway enforcement, crime scene and supervisory duties.

- b. At any given time, approximately 185 vehicles driven by uniformed officers are on duty including patrol vehicles, beach vehicles, crime scene vehicles and supervisory vehicles.

- c. Depending on certain factors, between three and five New York State Police vehicles are on duty in Suffolk County from 11:00 p.m. to 7:00 a.m., between seven and eleven New York State Police vehicles are on duty from 7:00 a.m. to 3:00 p.m., and between eight and twelve New York State Police vehicles are on duty from 3:00 p.m. to 11:00 p.m.

LILCO Interrogatory No. 33

33. To the extent not already provided in your response to Interrogatory No. 30 above, please indicate how many police vehicles driven by uniformed officers are on duty at any given time for each of the following police departments:

- a. Suffolk County Sheriff's Office
- b. Riverhead Police Department
- c. Southampton Police Department
- d. Southold Police Department

- e. Belle Terre Village Police Department
- f. Old Field Village Police Department
- g. Head of the Harbor Police Department
- h. Nissequogue Police Department
- i. Quogue Police Department
- j. Westhampton Police Department
- k. Parkway Police

Answer to Interrogatory No. 33.

With respect to subpart a, there are approximately 158 uniformed deputies on duty with the Suffolk County Sheriff's Office, dedicated largely to court and civil process duties, not police functions. With respect to subpart k, the "Parkway Police" are part of the State Police. See Answer to Interrogatory 32c. The Governments do not have specific information for the other departments listed in subparts b-j, which are separate entities from the Suffolk County Police Department.

LILCO Interrogatory No. 34

34. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contentions 1 and 2 functions. Please provide copies of all such plans and procedures.

Answer to Interrogatory No. 34.

None has been identified or exists.

LILCO Interrogatory No. 35

35. Please state each and every reason why Intervenors believe that their implementation of the Contentions 1-2 functions as described in their responses to Interrogatories Nos. 30-31 above would be their "best efforts," whereas following the LILCO Plan

would not. Please list each and every factor that Intervenors claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Answer to Interrogatory No. 35.

See Answer to Interrogatory No. 19.

LILCO Interrogatory No. 36

36. With respect to the Contention 10 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Answer to Interrogatory No. 36.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments will not follow LILCO's Plan.

LILCO Interrogatory No. 37

37. Unless the answer to Interrogatory No. 36 is a simple no, please identify the processes, methods, or means which the Suffolk County Police Department (SCPD) would use, undertake, or employ to perform access control functions at the EPZ perimeter in the event of a radiological emergency at Shoreham. Specifically, in an attachment to Intervenors' Opposition to LILCO's Motion for Summary Disposition of Contention 10 (Access Control at the EPZ Perimeter) (Feb. 10, 1988) Intervenors list several "issues of material fact in dispute." With respect to these issues, in your response to this interrogatory please include answers to the following questions which Intervenors raised:

- a. Has the SCPD made any "plans or preparations" to implement access control? (Governments' Statement of Issues of Material Fact in Dispute.)
- b. What "standards" would the "local authorities use for exclusion and over how wide an area?" (Id.)
- c. Would Suffolk County "interact" with other "response organizations?" If so, what other "response organizations" would it coordinate with? How would the County and these other "response organizations" coordinate? (Id.)

- d. How many SCPD personnel would be required to implement access control? How long would it take to mobilize SCPD personnel to implement access control? (Id.)
- e. Would the SCPD's response be affected by the absence of radiological protection training or equipment? If so, how would it be affected? (Id.)

Answer to Interrogatory No. 37.

The answer to subpart a is no. With respect to the remaining subparts, the Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 38

38. To the extent not already provided in your response to Interrogatory No. 37 above, please answer the following:

- a. Would Suffolk County and the State of New York try to provide control of access to the Shoreham 10-mile EPZ if it had to be evacuated in a radiological emergency?
- b. Would the State and County provide access control during the evacuation? If so, would the State and County forbid people to enter the EPZ? If not, what would the "Access control" consist of?
- c. Would the State and County provide access control after the EPZ had been evacuated? If so, why?
- d. Where would police (or other personnel) be stationed to provide access control? List all locations.
- e. How many personnel would be required to provide this access control?
- f. How long would it take Suffolk County and the State to have people in place to provide this access control?

Answer to Interrogatory No. 38.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 39

39. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon performing the Contention 10 functions. Please provide copies of all such plans and procedures.

Answer to Interrogatory No. 39.

None has been identified or exist.

LILCO Interrogatory No. 40

40. Please state each and every reason why Intervenors believe that their implementation of the Contention 10 functions as described in their responses to Interrogatories 37-38 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenors claim would prevent their "best efforts" response from satisfying the applicable NRC requirements.

Answer to Interrogatory No. 40.

See Answer to Interrogatory No. 19.

LILCO Interrogatory No. 41

41. With respect to the Contention 4 functions, please state whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, would do anything other than generally follow the LILCO Plan.

Answer to Interrogatory No. 41.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments will not follow LILCO's Plan.

LILCO Interrogatory No. 42

42. Unless the answer to Interrogatory No. 41 is a simple no, please identify the processes, methods, or means which New York State and Suffolk County (SCPD) would use, undertake, or employ to remove obstructions from public roadways in the event of a radiological emergency at Shoreham. Specifically, in an attachment to Intervenor's Response in Opposition to LILCO's Motion for Summary Disposition of Contentions 4 and 9 (Feb. 10, 1988), Intervenor's list several "material facts as to which there exists a genuine issue to be heard on matters raised by LILCO's Motion for Summary Disposition of Contentions 4 and 9." With respect to these "material facts," in your response to this interrogatory please include answers to the following questions which Intervenor's raised:

- a. Who from New York State and Suffolk County would be in "overall charge" of an effort to remove road obstructions? Who would actually remove road obstructions and how would they remove them? (Statement of Material Facts.)
- b. How would the removal of road obstructions be "coordinated with such other functions as guiding traffic and selecting alternate evacuation routes?" (Id.)
- c. How would a decision to develop and implement a plan to remove road obstructions be implemented? How long would it take to implement such a plan? (Id.)
- d. How long would it take to mobilize and dispatch personnel into the field to remove road obstructions? Would a "sufficient" number of qualified personnel be "available, willing, and able to implement a plan to remove road obstructions?" (Id.)

Answer to Interrogatory No. 42.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons

set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 43

43. To the extent not already provided in your response to Interrogatory No. 42, please state how the State and County would remove road obstructions in a Shoreham emergency by answering the following:

- a. Would Suffolk County and New York State direct or permit LERO road crews to remove obstructions?
- b. Other than LERO vehicles, what vehicles would the State and County use to remove obstructions?
- c. How many such vehicles are available?
- d. Where are these vehicles garaged? Provide addresses and the number of vehicles at each address.
- e. Are these vehicles available to the State or County at all times? If not, when are they unavailable?
- f. What personnel would the State and County use to remove obstructions?
- g. Where are the drivers and personnel needed to remove obstructions during ordinary business hours?
- h. Where would the State and County station vehicles and personnel for the purpose of removing road impediments once a Shoreham emergency had begun?
- i. If during a Shoreham emergency a LERO road crew were in a position to remove a road impediment materially faster than the State or County could do it, would the State and County permit the LERO road crew to remove the impediment? If not, why not?
- j. How does Suffolk County remove road impediments ordinarily (that is, when there is no Shoreham emergency)? Does the County use county vehicles, privately owned tow trucks, or something else? Who owns these vehicles? (List owners and number of vehicles for each owner.) How many such vehicles are available to the County?

Answer to Interrogatory No. 43.

The answer to subparts a and i are no, as set forth in Mr. Halpin's and Dr. Axelrod's testimony. The Governments object to the remainder of this Interrogatory (except subpart j) on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. With respect to subpart j, road impediments are generally removed by private contractors licensed by the Towns located in Suffolk County. The numbers of such private contractors and their identities are not known precisely by the County, but the information is probably available from lists maintained by the Town Clerk of each Town.

LILCO Interrogatory No. 44

44. Identify any and all plans and procedures that New York State and Suffolk County would use, follow, or otherwise rely upon in performing the Contention 10 functions. Please provide copies of all such plans and procedures.

Answer to Interrogatory No. 44.

None has been identified or exists.

LILCO Interrogatory No. 45

45. Please state each and every reason why Intervenors believe that their implementation of the Contention 4 functions as described in their responses to Interrogatories Nos. 42-43 would be their "best efforts," whereas following the LILCO Plan would not. Please list each and every factor that Intervenors claim would prevent their "best efforts" response from satisfying applicable NRC requirements.

Answer to Interrogatory No. 45.

See Answer to Interrogatory No. 19.

LILCO Interrogatory No. 46

46. State whether New York State and Suffolk County, as part of a "best efforts" response to a radiological emergency at Shoreham, will use LILCO's ingestion pathway and recovery and reentry procedures as set forth in the LILCO Plan. If the answer is no, state why New York State and Suffolk County would not use LILCO's procedures.

Answer to Interrogatory No. 46.

For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the Governments will not follow LILCO's Plan.

LILCO Interrogatory No. 47

47. If the answer to Interrogatory No. 46 is no, state whether New York State and Suffolk County will use the New York State Radiological Emergency Preparedness Plan's (hereinafter "State Plan") procedures for an ingestion pathway and recovery and reentry response to a Shoreham emergency. If the answer is yes, identify what portions of the State Plan would be used and whether that response would be adequate to satisfy the applicable regulatory requirements. If the answer is no, state why New York State and Suffolk County would not use the State Plan.

Answer to Interrogatory No. 47.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information. The State notes, however, that the REPG Affidavit of February 10, 1988 makes clear that the State Plan could not be so used.

LILCO Interrogatory No. 48

48. State whether New York State and Suffolk County would set up a recovery committee to direct all recovery and reentry activities in response to a Shoreham emergency. If the State and County would not set up such a committee, state what the State and County would do instead. If the State and County would set up such a committee, state who would be on the committee and what their responsibilities would be.

Answer to Interrogatory No. 48.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 49

49. If New York State and Suffolk County would not use LILCO's or New York State's procedures, state what New York State and Suffolk County would do to provide for the following during a Shoreham emergency, as listed in the State Plan at IV 2-3"

- (a) Sampling and monitoring of radiation and evaluation of data.
- (b) Decontamination activities, including waste disposal.
- (c) Security, including police and fire protection for affected area.
- (d) Medical service.
- (e) Electric power and telephone communications.
- (f) Food and water supply.
- (g) Operability of sanitary systems.

- (h) Transportation.
- (i) Sources of heat.
- (j) Conditions and needs of the affected population.

Answer to Interrogatory No. 49.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 65

65. If it is true that New York State has sufficient resources to respond to an emergency at the Millstone, Haddam Neck, Oyster Creek, and Indian Point nuclear power plants that affects the areas of the State located within the Shoreham 50-mile EPZ, state why, at page 7 of the "Affidavit of James D. Papile, James C. Baranski and Lawrence B. Czech" ("REPG Affidavit") supporting Intervenors' Response to LILCO's Motion for Summary Disposition of Contentions 7 and 8 (Feb. 10, 1988), REPG says "[t]he State has no sufficient resources to respond to a Shoreham emergency."

Answer to Interrogatory No. 65.

As stated in the Governments' April 13 Objection and Offer of Proof, the State has not adopted any plan for Shoreham. Thus, no resources have been allocated to respond to a Shoreham emergency.

LILCO Interrogatory No. 66

66. State whether the State and the counties and other pertinent jurisdictions within the 50-mile EPZ for Shoreham would respond in the same manner to a Shoreham emergency as they would to a radiological emergency at Millstone, Oyster Creek, Haddam Neck, or Indian Point. If the answer is no, explain why the State's and the counties' responses to a Shoreham emergency would not be the same and describe how they would be different.

Answer to Interrogatory No. 66.

The Governments cannot speak for the "counties and other pertinent jurisdictions within the 50-mile EPZ for Shoreham," other than Suffolk County. The Governments also object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 75

75. Is it the Intervenor's position that preparation, in the form of training, drills, and exercise, for a plume exposure response to a radiological emergency is adequate preparation for an ingestion pathway and recovery and reentry response?

Answer to Interrogatory No. 75.

No.

LILCO Interrogatory No. 84

84. The REPG Affidavit at page 8 states: "From experience at other sites in New York State, we have learned that the only way the State and local government personnel have been able to develop adequate site specific response capabilities is through detailed planning, interfacing with personnel, drilling, and exercising." Identify the "other sites" and the "experience" referred to in the REPG Affidavit.

Answer to Interrogatory No. 84.

The "other sites" are other nuclear plants in the State of New York. The "experience" consists of FEMA comments following exercises and drills.

LILCO Interrogatory No. 106

106. In denying LILCO Material Fact No. 4 REPG states that "the State has not developed procedures that are applied generically to other plants. Rather, all procedures of the State are tailored to site-specific situations" If this statement is true, explain why the Intervenor admitted that the State has a "generic State plan" that is applied to all nuclear power plants. Identify "all procedures of the State that are tailored to site-specific situations" and identify those "site-specific situations."

Answer to Interrogatory No. 106.

This Interrogatory is based on the premise that "the Intervenor admitted that the State has a 'generic State plan' that is applied to all nuclear power plants." In response to LILCO Material Fact No. 3, REPG did not make such an admission, but, rather, agreed with the statement that "The State Plan is comprised of (1) a 'generic state plan' that is applied to all nuclear power plants and (2) appendices containing the county plans for all nuclear power plants in New York State other than Shoreham." LILCO has apparently misinterpreted the statement in the REPG Affidavit. An explanation of the relationship between the "generic State plan" and the site-specific plans, the identity of the procedures tailored to site-specific situations, and the identity of the site-specific situations is presented in paragraphs 5, 6 and 7, as well as other portions, of the REPG Affidavit.

LILCO Interrogatory No. 107

107. State what additional ingestion pathway and recovery and reentry activities must be taken in response to a radiological emergency that require "detailed interfacing and practice sessions" that the LILCO Plan does not address. See REPG Affidavit at 18-19.

Answer to Interrogatory No. 107.

As the REPG Affidavit states in response to LILCO Material Fact No. 6, "Ingestion pathway and recovery and reentry activities are complex . . . [T]here is considerable leeway for State and local governments to decide what actions are appropriate Absent such detailed pre-planning, it is likely that a response would be ad hoc, ineffective and inadequate." For the reasons set forth in the Governments' April 13 Objection and Offer of Proof, the State of New York has not engaged in such pre-planning and has not adopted any plan for responding to a Shoreham emergency. The State of New York is thus in no position to provide further information.

LILCO Interrogatory No. 109

109. Identify what "staff members" would [provide] the "local chief executive" of Suffolk County with "information and recommendations" about recovery operations during a Shoreham emergency. See REPG Affidavit at 19-20. Identify what information and recommendations are referred to here.

Answer to Interrogatory No. 109.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 110

110. State what is the basis for the statement "any recovery committee which may be appointed is tailored to the specific site and to the specific details of the emergency." REPG Affidavit at 20. Give examples where this has been done during training, drills or exercises.

Answer to Interrogatory No. 110.

The basis for the statement, "any recovery committee which may be appointed is tailored to the specific site and to the specific details of the emergency" is based on, among other things, the diversity of the affected community in terms of sociological, economical, industrial, agricultural and other matters, and the variation of the structures of local governments. As examples, some counties have local health departments and others do not, some counties have a county executive who is empowered to make certain decisions and some counties have a different form of government involving a chairman who may or may not be empowered to make certain decisions. The nature of the accident would also dictate the nature of the recovery committee.

LILCO Interrogatory No. 111

111. In response to LILCO Material Fact No. 14, REPG states that "a variety of other persons may have primary responsibility" for the activities identified in that Material Fact. REPG Affidavit at 20. Give examples where this has been done during training, drills or exercises.

Answer to Interrogatory No. 111.

Other persons, whose responsibilities and activities are self-explanatory, include personnel from the Red Cross, religious organizations, the Salvation Army, psychological therapy groups, local agricultural or business organizations, etc.

LILCO Interrogatory No. 114

114. In reference to LILCO Material Fact No. 26, state what other facts would be considered before information about recovery actions would be disseminated to the public. See REPG Affidavit at 23.

Answer to Interrogatory No. 114.

The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they have not adopted any plan, or trained or planned for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

LILCO Interrogatory No. 119

119. Who in the New York State government and who in the Suffolk County government are most knowledgeable about how the State and County would respond to a Shoreham emergency with respect to each of the following functions:

- a. guiding traffic
- b. blocking roadways, erecting barriers in roadways, and channeling traffic
- c. removing obstructions from public roadways, including towing private vehicles
- d. activating sirens and directing the broadcasting of emergency broadcast system messages
- e. making decisions and recommendations to the public concerning protective actions
- f. making and implementing decisions and recommendations to the public concerning protective actions for the ingestion exposure pathways
- g. making and implementing decisions and recommendations to the public concerning recovery and reentry

h. performing access control at the EPZ perimeter?

Answer to Interrogatory 119.

With respect to the State of New York, Commissioner David Axelrod has been identified to testify regarding the State's response. Suffolk County Executive Patrick Halpin has been designated to testify regarding the County's response.

LILCO Interrogatory No. 121

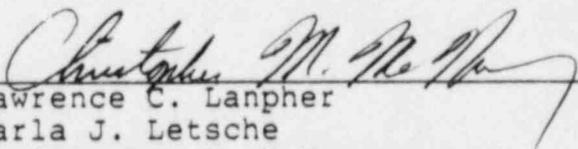
121. If Shoreham were in fact operating at 100 percent power, would (a) the State of New York and (b) Suffolk County do anything to improve their present state of preparedness to respond to a radiological emergency? If so, precisely what would (a) the State and (b) the County do?

Answer to Interrogatory 121.

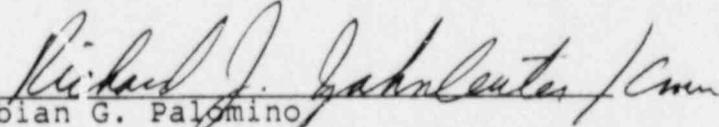
The Governments object to this Interrogatory on the ground that it calls for speculation by the Governments. Notwithstanding this objection, the Governments state that, for the reasons set forth in their April 13 Objection and Offer of Proof, they

have not adopted any plan for responding to a Shoreham emergency. Accordingly, they are in no position to provide further responsive information.

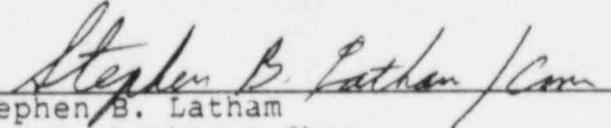
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ORDER NUMBER 82-1
1/6/88 CHIEF INSPECTOR
XX
XX

NOTIFICATION TO THE COUNTY EXECUTIVE

Effective immediately, the Duty Officer will notify a representative of the Office of the County Executive in the event of a newsworthy or major incident.

The representatives to be contacted are:

Monday - Friday, 0900-1700

Contact one of the following (call in order as listed):

THOMAS McATEER
CHIEF DEPUTY COUNTY EXECUTIVE

LARRY SCHWARTZ
DEPUTY COUNTY EXECUTIVE

DENNIS McCARTHY
ASSISTANT TO COUNTY EXECUTIVE

All Other Times and Holidays

DENNIS McCARTHY
ASSISTANT TO COUNTY EXECUTIVE

The Duty Officer will note in the Duty Officer's Log the time, date, and person contacted or will document attempts to make contact in the log.

END

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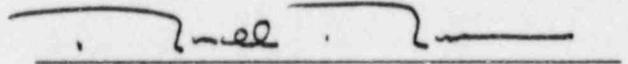
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Atomic Safety and Licensing Board
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* By Federal Express