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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 )  
 )  
(Shoreham Nuclear Power Station, )  
Unit 1 )  
\_\_\_\_\_ )

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

GOVERNMENTS' OBJECTIONS TO LILCO'S FIRST SET OF  
REQUESTS FOR ADMISSIONS REGARDING CONTENTIONS  
1-2, 4-8, AND 10 TO SUFFOLK COUNTY AND NEW YORK STATE

Pursuant to 10 CFR § 2.742, Suffolk County and the State of New York (the "Governments") hereby object to LILCO's First Set of Requests for Admissions Regarding Contentions 1-2, 4-8, and 10 to Suffolk County and New York State ("LILCO's Requests for Admissions"), which were served on April 28, 1988.

The Governments object to LILCO's Request for Admissions because they are untimely. In its Confirmatory Memorandum and Order of April 12, 1988, the Board extended discovery on the CLI-86-13 issues until April 22. On April 18, the Board issued an additional Confirmatory Memorandum and Order which extended discovery to April 29 only for the purpose of deposing certain

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Government witnesses. Thus, other than the taking of those depositions, the discovery period in this proceeding ended on April 22. LILCO's Requests for Admissions were filed on April 28 and are, therefore, untimely. On this ground, the Governments object to the following two requests:

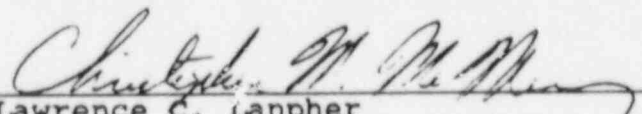
LILCO Request for Admission No. 1

1. That the enclosed document entitled Suffolk County Radiological Response Plan and dated November 1982 is a true and accurate copy of Volume I of the "Draft County Radiological Emergency Response Plan" referenced in Suffolk County Resolution 111-1983.

LILCO Request for Admission No. 2

2. That the enclosed document entitled New York State Radiological Preparedness Plan for Commercial Power Plants is a true and accurate copy of said plan, absent Part III -- County Radiological Emergency Preparedness Plans, and is the most current revision of said plan. If Intervenor do not so admit, LILCO hereby requests that a copy of the most current revision of said plan be provided promptly.

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DOCKETED  
USNRC  
May 10, 1988

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 MAY 12 P6:22

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
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(Shoreham Nuclear Power Station,		)
Unit 1)		)
_____		)

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

CERTIFICATE OF SERVICE

I hereby certify that copies of GOVERNMENTS' OBJECTIONS TO LILCO'S FIRST SET OF REQUESTS FOR ADMISSIONS REGARDING CONTENTIONS 1-2, 4-8, AND 10 TO SUFFOLK COUNTY AND NEW YORK STATE has been served on the following this 10th day of May, 1988 by U.S. mail, first-class, except as otherwise noted.

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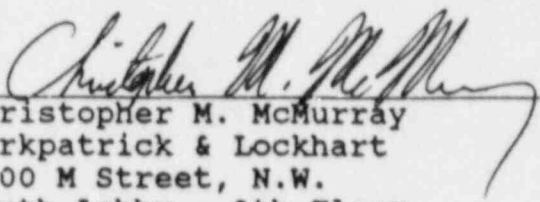
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Board Panel Docket  
U.S. Nuclear Regulatory Comm.  
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\*Via Federal Express