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LILCO, February 24, 1988

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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| In the Matter of |) | |
| |) | |
| LONG ISLAND LIGHTING COMPANY |) | Docket No. 50-322-OL-3 |
| |) | (Emergency Planning) |
| (Shoreham Nuclear Power Station, |) | |
| Unit 1) |) | |

LILCO'S FIRST SET OF REQUESTS FOR ADMISSIONS
REGARDING LILCO'S EMERGENCY BROADCAST SYSTEM

Pursuant to 10 C.F.R. § 2.742, Long Island Lighting Company, by its counsel, requests that Suffolk County, New York State, and the Town of Southampton ("Intervenor" or "The Intervenors") admit or deny, within 10 days of service of this request, the Requests for Admissions contained herein.

INSTRUCTIONS

A. Each request for admission shall be answered separately and fully in writing under oath in accordance with § 2.742 of the NRC's Rules of Practice. To the extent that Intervenors do not have specific, complete, and accurate information with which to answer any request for admission, intervenors should so state, and the request for admission should be answered to the extent information is available, identifying each person who is believed to have accurate information with respect thereto.

B. Each request for admission shall be deemed to be continuing, and Intervenors are requested seasonably to supplement answers with additional facts and information, in accordance with § 2.740 (e)(1) and (2) of the NRC's Rules of Practice.

C. The words "and" and "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

D. Wherever appropriate, the singular form or a word shall be interpreted in the plural, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

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E. Wherever appropriate, the masculine form of a word shall be interpreted as feminine, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

F. If Intervenors object to or claim a privilege (attorney-client, work product, or other) with respect to any request for admission, in whole or in part, or seek to withhold any such information because of the alleged proprietary nature of the data, please set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Licensing Board to determine the validity of the objection or claim or privilege.

G. When, in order to answer a question fully or accurately, it is necessary to distinguish between the responses of individual Intervenors or to identify individual Intervenors, such distinctions or identifications should be made in the answer.

DEFINITIONS

A. "LILCO" or "LILCO personnel" means Long Island Lighting Company and any affiliate, agent, employee, consultant, contractor, technical advisor, representative, or other person acting for or on behalf of LILCO, or at LILCO's direction or control, or in concert with LILCO or assisting LILCO.

B. "Shoreham" means the Shoreham Nuclear Power Station, Unit 1, any part thereof, or any structure, system, component, instrumentation, equipment, or materials included in, or intended to be included in, Shoreham.

C. "Intervenors" means Suffolk County, New York State, and the Town of Southampton, or any of them, of any agency thereof and any agent, employee, consultant, contractor, technical advisor, representative or other person acting for or on behalf of them, or at their direction and control, or in concert with or assisting them.

REQUESTS FOR ADMISSIONS

1. That WPLR-FM provides full, 24-hour coverage to the entire 10-mile EPZ around Shoreham.

2. That reception of WPLR's signal within the 10-mile EPZ is not in fact "impaired or attenuated."

3. That most radios on Long Island have unipolar, not dipolar antennas, and thus the directional orientation of antennas is not relevant.

4. That the geography of Long Island, including specific terrain effects such as any hilly areas on the north shore, does not prevent WPLR from providing full 24-hour coverage to the entire 10-mile EPZ around Shoreham.

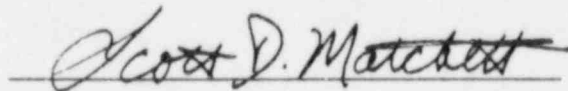
5. That radio stations WICC(AM) and WELI(AM) provide AM coverage to the full 10-mile Shoreham EPZ during the day.

6. That, as stated in the agreements between LILCO and WELI and WICC (Attachments 2 and 3 to LILCO's Nov. 6 Summary Disposition Motion), WELI and WICC are permitted by their FCC licenses to broadcast at full power at any time during emergencies.

7. That signal contours generated from FCC-recognized signal strengths are conservative, meaning that most stations can actually be heard at distances beyond those shown in their computed signal contours.

Pursuant to 10 C.F.R. § 2.740b, if Intervenors deny any of the above requests for admissions, please state the reason for such denial. Please identify and produce a copy of any document that Intervenors believe supports each such denial.

Respectfully submitted,



Counsel for Long Island Lighting Company

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DATED: February 24, 1988