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~~RELATED CORRESPONDENCE~~

LILCO, March 7, 1988

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'88 MAR -9 A10:23

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

LILCO'S RESPONSES AND OBJECTIONS TO SUFFOLK COUNTY'S  
FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION  
OF DOCUMENTS REGARDING EMERGENCY BROADCAST SYSTEM

LILCO hereby responds to Suffolk County's First Set of Interrogatories and Request for Production of Documents concerning EBS issues, dated February 29, 1988 and served on LILCO on March 1, 1988.

**I. GENERAL ANSWERS AND OBJECTIONS TO  
INTERROGATORIES, DEFINITIONS AND INSTRUCTIONS**

A. LILCO objects to all interrogatories, definitions and instructions insofar as they require the disclosure of any information protected by the attorney-client privilege or work product doctrine.

B. LILCO objects to all interrogatories to the extent they purport to require information outside the possession, custody or control of LILCO.

C. LILCO objects to the inclusion of attorneys in the definition of "LILCO" or "LILCO personnel" in paragraph H of Suffolk County's Definitions and Instructions because their inclusion is clearly calculated to discover information protected by the attorney-client privilege and the work product doctrine.

D. LILCO objects on relevance grounds to all interrogatories and requests that seek information that is outside the scope of the coverage issues raised in contentions 1.A, 1.B, 1.C, and 2.A, as limited by the Board in its February 24, 1988 Memorandum and Order. LILCO objects to individual interrogatories on this ground where appropriate.

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## II. ANSWERS AND OBJECTIONS TO INTERROGATORIES

### Suffolk County Interrogatory No. 1

Identify each person whom LILCO expects to call as an expert or non-expert witness during the EBS proceeding and the subject matter on which each witness will testify.

**Response:** LILCO identified two witnesses for the EBS proceeding on February 25, 1988, the first day of the discovery period, in a letter to Suffolk County counsel. Letter from LILCO counsel to Suffolk County counsel, February 25, 1988. The two witnesses are Douglas M. Crocker and Ralph E. Dippell, Jr. Mr. Crocker will be the Company representative on the panel and will testify as necessary regarding Rev. 9's provisions concerning the Shoreham EBS, the agreements with the three new radio stations, etc. Mr. Dippell will testify in support of Cohen and Dippell's conclusions regarding the coverage of LILCO's EBS.

LILCO may name one additional witness to testify in this proceeding, and will notify Suffolk County promptly by telephone if it does so.

### Suffolk County Interrogatory No. 2

For each expert witness identified in response to Interrogatory No. 1, state the substance of the facts and opinions on which each expert is expected to testify and a summary of the grounds for each opinion.

**Response:** The substance of the facts and opinions on which Mr. Dippell will testify is contained in his affidavit which was attached to LILCO's Nov. 6 summary disposition motion.

### Suffolk County Interrogatory No. 3

Provide an up-to-date resume of each witness identified in response to Interrogatory No. 1.

**Response:** LILCO provided a resume for Mr. Crocker in connection with the school bus driver remand proceeding. A copy of Mr. Dippell's resume is being provided with these responses.

### Suffolk County Interrogatory No. 4

For each witness identified in response to Interrogatory No. 1, provide all studies, papers, articles, reports, books and other such documents, published or unpublished, authored or prepared by each such witness relating to the issues in this

proceeding including, but not limited to, emergency broadcast system, signal strength, signal strength measurements and technical requirements for EBS stations.

**Response:** For Mr. Crocker, there are no such documents. For Mr. Dippell, to the extent his unpublished studies, papers, etc. are relevant to the narrow issues in this proceeding and not privileged or proprietary, LILCO will provide copies of such documents as soon as possible, within the 15-day discovery period. LILCO will also provide a list of works published by each witness. LILCO objects to providing copies of published documents to which LILCO and Suffolk County have equal access in the public record.

As a practical matter, LILCO has already provided to the Intervenor (in attachments to LILCO's Nov. 6 summary disposition motion and in documents voluntarily produced on March 1) all studies, reports, etc. prepared by Cohen and Dippell regarding the coverage of the stations in LILCO's EBS. LILCO objects to Interrogatory no. 4 to the extent it seeks all documents ever prepared by Mr. Dippell regarding "signal strength" or "signal strength measurements." Cohen and Dippell, P.C. and its predecessors have provided professional engineering services, including such signal strength studies, to the broadcasting industry for 50 years. Many such studies are confidential commercial information which can be produced only on the consent of the individual clients for whom they were prepared. Intervenor's request for all such studies is overly broad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

#### Suffolk County Interrogatory No. 5

Identify by date, location and proceeding, all prior testimony before any judicial, administrative, or legislative body, including deposition testimony, concerning emergency preparedness, including emergency broadcast systems and the adequacy and coverage capabilities of radio stations, given by each of the witnesses identified in response to Interrogatory No. 1.

**Response:** Mr. Crocker has previously testified as a witness only in the Shoreham reception centers proceeding, which was held in July 1987. He was deposed in connection with that proceeding on June 22, 1987. Mr. Crocker has also been designated as a witness in the school bus driver remand proceeding, and was deposed in connection with that proceeding on February 2, 1988.

Information concerning relevant testimony of Mr. Dippell is included in his resume.

Suffolk County Interrogatory No. 6

Provide copies of all correspondence or other communications between LILCO and the radio stations participating in LILCO's EBS. Such documents already provided to Suffolk County in connection with earlier Shoreham emergency planning proceedings need not be produced again, but merely identified.

Response: LILCO objects to Interrogatory no. 6 on the grounds that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The only admitted issues in this proceeding concern the coverage of WPLR and the other EBS stations within the 10-mile EPZ. LILCO has already provided Suffolk County with all known documents concerning such coverage. Intervenors' request for "all correspondence or other communications" between LILCO and the radio stations is not likely to lead to the discovery of admissible evidence on the coverage issue.

Suffolk County Interrogatory No. 7

Provide copies of all correspondence to or from, and any other documents or information sent by or on behalf of LILCO, to, or received from, FEMA and/or the NRC, or any other federal agency, federal personnel, or contractor thereof, relating to LILCO's EBS.

Response: The only documents sent by LILCO to the NRC or FEMA or any other federal agency concerning the EBS are Rev. 9 to the LILCO Plan and the pleadings associated with the EBS issue (LILCO's summary disposition motion, contention objections, etc.). LILCO submitted Rev. 9 to the NRC on January 22, 1988. EBS-related pleadings were filed on and received from the NRC and FEMA in the normal course of litigation on this issue, i.e., at the same time pleadings were filed on and received from the Intervenors.

Suffolk County Interrogatory No. 8

Identify by date and description all drills, exercises, classroom training sessions, and all other training or instructional activities or documents relating to LILCO's EBS that have been held and/or are scheduled to be held.

Response: LILCO objects to Interrogatory no. 8 on the ground that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Information about drills, exercises, and EBS-related training is not relevant to the adequacy of the EBS stations' broadcast coverage within the 10-mile EPZ, which is the only issue raised by the admitted contentions. Nor is such information likely to lead to the discovery of admissible evidence on the coverage questions.

Suffolk County Interrogatory No. 9

For each activity identified in response to Interrogatory No. 8, provide all documents concerning the activity.

Response: LILCO objections to this Interrogatory for the same reasons given in its response to Interrogatory no. 8.

Suffolk County Interrogatory No. 10

Provide all documents, including but not limited to correspondence, the survey instrument and drafts thereof, and all raw data relating to the telephone survey, as referenced in LILCO's Motion, conducted by Campaign Research, Inc., of Westport, Connecticut between September 30, 1987 and October 4, 1987.

Response: The questions and numerical results of the survey, along with a one-page report on the highlights of the survey and the methodology used, were attached to LILCO's November 6, 1987 summary disposition motion as Att. 7. The survey is also described in the Johnson affidavit that is Attachment 10 to LILCO's summary disposition motion. A copy of the actual survey question form is provided with these responses. LILCO will provide Suffolk County with copies of the completed survey forms (the "raw data"), if they are still in existence, as soon as possible.

LILCO is withholding one document, an undated draft of the survey question form with counsel's handwritten notes, based on the attorney-client privilege and work product doctrine.

Suffolk County Interrogatory No. 11

Identify all schools, hospitals, nursing homes, handicapped facilities, large employers or other organizations which have been or will be provided with tone alert radios capable of being by activated [sic] WPLR's EBS signal.

Response: LILCO objects to Interrogatory no. 11 on the ground that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The only admitted issue in this proceeding is whether LILCO's EBS provides adequate coverage within the 10-mile EPZ. The tone alert radios are at issue only to the extent that Intervenor's allege that WPLR's EBS tone will not activate them. Moreover, the tone alert radios are activated by WPLR, and it is LILCO's position that WPLR provides full coverage of the entire 10-mile EPZ, including all facilities within 10 miles that have been or will be provided with tone alert radios. The identity of each such facility is of no consequence to the coverage issue, nor is it likely to lead to the discovery of admissible evidence on that issue.

In addition, as LILCO noted in its November 6 summary disposition motion, the tone alert radios are a backup or secondary means of notifying those facilities that possess them; in an emergency those facilities would also be notified by sirens and LERO phone calls. See LILCO's Summary Disposition Motion at 3. The Board stated that it knew of "no requirement that special facilities be alerted earlier than the general public in an emergency," and found that "the inclusion of the tone alert radio system in the Plan is simply a commendably prudent addition to the requirements." PID at 760. Thus, Intervenor's inquiry here into the identities of facilities with tone alert radios is irrelevant not only for the reason given above, but for the additional reason that the Board has already held tone alert notification of special facilities not to be required by the regulations.

Suffolk County Interrogatory No. 12

Provide a copy of all documents, including correspondence and drafts, concerning the modification or replacement of any and all tone alert receivers that were set to be activated by WALK radio.

Response: LILCO has already provided (by Federal Express on March 1, 1988) the County with any documents that are responsive to this Interrogatory. LILCO will continue to search and will produce any additional responsive documents as soon as they are discovered.

Suffolk County Interrogatory No. 13

Identify all persons who have evaluated, analyzed, or studied any of the radio stations comprising LILCO's EBS, in connection with such radio stations' participation in the EBS and explain the nature of such persons' activities in this regard.

Response: LILCO objects to this Interrogatory except to the extent it requests the identity of persons who have analyzed or studied the coverage capabilities of the EBS stations within the 10-mile EPZ. LILCO also objects to Interrogatory no. 13 to the extent it seeks to discover any role LILCO counsel may have played in analyzing the EBS stations' capabilities.

Within these confines, LILCO answers that the following persons evaluated the coverage of the Shoreham EBS stations: Ralph E. Dippell, Jr., Robert W. Guill, and Sudhir K. Khanna, all of Cohen and Dippell, P.C. The nature of their participation and involvement is indicated in the engineering reports that have been provided to Intervenor as part of LILCO's November 6, 1987 summary disposition motion and in LILCO's voluntary production of documents on March 1, 1988.

Suffolk County Interrogatory No. 14

With respect to each person identified in response to Interrogatory 13, above, provide all documents prepared by, for, or under the supervision of such person relating to LILCO's EBS or the radio stations participating therein.

Response: LILCO already has provided the Intervenor with all of the engineering reports prepared by the Cohen and Dippell personnel identified in Interrogatory no. 13. LILCO will provide as soon as possible the detailed notes and other field data upon which the reports are based and which are not already included in the reports themselves. In addition, as mentioned in the June 1987 Engineering Report Re Field Strength Measurements Survey of WEZN and WPLR, Cohen and Dippell made audio tapes of the listening tests on WPLR. LILCO will produce copies of those tapes at Suffolk County's expense if the County notifies LILCO that it wants them. To the best of LILCO's knowledge, there are no other documents in existence that are responsive to Interrogatory no. 14.

Suffolk County Interrogatory No. 15

Provide all documents underlying, supporting, or relied upon in preparing the Cohen and Dippell reports attached to LILCO's motion for summary disposition on the EBS issues, including, but not limited to, notes, memoranda, field data, data compilations and drafts of the reports.

Response: Beyond the documents mentioned in LILCO's response to the previous Interrogatory, there are no documents in existence that are responsive to Interrogatory no. 15. See LILCO's Response to Interrogatory no. 14.

Suffolk County Interrogatory No. 16

Identify all persons who participated in preparing the Cohen and Dippell reports and explain the nature of their participation.

Response: See LILCO's Response to Interrogatory no. 13.

Suffolk County Interrogatory No. 17

Describe in detail any portions of the EPZ that are not covered by an AM signal, including but not limited to, the "portion of the EPZ that might remain uncovered by a nighttime AM signal" as referenced in LILCO's Motion. Describe also in detail any portions of the EPZ that are not covered by an FM signal. Provide all documents, including correspondence and drafts, relating to any portions of the EPZ identified above.

Response: There are no portions of the EPZ that are not covered by an FM signal. There are no portions of the EPZ that are not covered by an AM signal during the day. LILCO has made no detailed analysis concerning which, if any, areas of the EPZ are not covered by an AM signal at night, and thus cannot "describe in detail" any such areas. LILCO notes only that the signal contours of the EBS stations are presented in the September 1987 Cohen and Dippell report (Att. 6 to LILCO's summary disposition motion), and that signal contours are conservative representations of coverage, meaning that most stations can actually be heard far beyond what the signal contours indicate.

Suffolk County Interrogatory No. 18

(a) Describe in detail LILCO's "requirements" for testing WPLR-FM's "signal" as referenced in the letter confirming WPLR's willingness to participate in LILCO's EBS dated July 27, 1987, and included as Attachment 1 to LILCO's Motion.

(b) Has LILCO furnished WPLR-FM, or any other person, with such requirements? Provide a copy of all documents, including all correspondence and drafts, relating to such requirements.

Response: LILCO objects to Interrogatory no. 18 because it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The only admitted issues concern the adequacy of the EBS network's broadcast coverage within the 10-mile EPZ. The admitted contentions say nothing about signal testing or the requirements that such tests must satisfy. They go only to coverage. Thus, Interrogatory no. 18 goes beyond the scope of the admitted contentions and is irrelevant to the coverage issue.

Without waiving this objection, LILCO states that the only "requirements" referred to are that WPLR make a reasonable effort to participate in LERO drills (in addition to the regular weekly EBS tests) when asked to do so by LILCO.

Suffolk County Interrogatory No. 19

Describe in detail any test of, or attempt to activate or implement LILCO's EBS plan, in whole or in part, and equipment related thereto. Provide a copy of all documents relating to any such activities.

Response: LILCO objects to Interrogatory no. 19 for the same reason it objected to Interrogatory no. 18, i.e., it is irrelevant to the narrow coverage issues raised in the admitted contentions. To the extent Interrogatory no. 19 seeks information concerning drills and exercises involving the EBS, LILCO objects for the same reasons it objected to Interrogatory no. 8.

Notwithstanding and without waiving these objections, LILCO answers that one test of WPLR's signal is mentioned in LILCO's summary disposition motion (at page 9) and in the Crocker affidavit attached thereto (paragraph 6). A memorandum concerning this test, prepared by one of LILCO's onsite personnel, is enclosed with these responses. In addition, LILCO responds that WPLR conducts weekly tests of its EBS signal. During one such test, on January 21, WPLR's EBS test signal activated a tone alert receiver (like the ones in place at the other EBS stations) at Mr. Crocker's desk in the LILCO training center in Central Islip, New York. Mr. Crocker clearly heard the tone and EBS test message. Mr. Crocker's contemporaneous memorandum concerning the test is enclosed with these responses. During the EBS test on March 4, personnel from

station WGLI reported to LILCO that WPLR's EBS tone activated WGLI's EBS equipment, and the test message was clearly heard. Mr. Crocker's contemporaneous memorandum memorializing this occurrence is also enclosed with these responses.

**Suffolk County Interrogatory No. 20**

LILCO states in its Motion that ". . . LILCO has provided or is providing each station with whatever additional equipment it needs to participate." Describe what additional equipment is required or necessary. Has such additional equipment been provided to each station in LILCO's EBS plan? Provide all documents relating to the provision of such additional equipment.

**Response:** LILCO objects to this Interrogatory on the ground that it seeks information that is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. The admitted contentions address only the adequacy of the EBS stations' signal coverage within the EPZ. Nowhere do the contentions mention the adequacy of EBS equipment or backup generating equipment provided to each station. Thus, Interrogatory no. 20 goes beyond the language of the admitted contentions and is not relevant to the admitted issues.

Notwithstanding and without waiving this objection, LILCO notes that Intervenor already know what equipment has been provided to the participating stations. The equipment provided to WPLR is described in LILCO's summary disposition motion (at pages 8-9) and is listed in detail in Attachment 4 to the motion. The equipment provided to the other EBS stations is also described in the motion (at page 9); this equipment consists of a single-frequency broadcast receiver set to WPLR-FM's frequency, and an EBS tone-activated switch. Motion at 9. All such equipment has been provided to WPLR and eight of the nine other EBS stations; the remaining station will receive its EBS equipment within the next few days.

**Suffolk County Interrogatory No. 21**

Identify all persons who have analyzed the type and directional orientation of antennas on Long Island for LILCO or on LILCO's behalf and state the conclusions of each such person. Provide all documents created by, for or under the supervision of such persons regarding such analyses.

**Response:** LILCO has not performed a detailed analysis on the directional orientation of antennas on Long Island.

**Suffolk County Interrogatory No. 22**

Provide a copy of all documents, including correspondence and drafts, concerning any request of any person, including FEMA, to review LILCO's EBS proposal as well as the response to such request.

**Response:** LILCO objects to Interrogatory no. 22 on the ground that it seeks information that is not relevant to the EBS coverage issues and is not reasonably calculated to lead to the discovery of admissible evidence on those issues. The identity of persons who may have asked to review the EBS plan is not likely to lead to the discovery of admissible evidence concerning the adequacy of broadcast coverage within the 10-mile EPZ.

Notwithstanding and without waiving this objection, LILCO answers that the only responsive document that it is aware of is LILCO's cover letter accompanying LILCO's transmittal of Rev. 9 to the NRC. That letter, dated January 22, 1988, was served on all parties by the NRC's docketing branch. The transmittal of Rev. 9, and the corresponding request by LILCO for the NRC to seek FEMA review of Rev. 9, were also mentioned in a January 27, 1988 letter from LILCO counsel to the NRC; that letter was also copied to counsel for the other parties.

**Suffolk County Interrogatory No. 23**

How will LILCO's EBS operate, as stated in LILCO's Motion, in "combination with the existing State EBS?" Provide a copy of all documents including correspondence and drafts, concerning such combination.

**Response:** LILCO objects to Interrogatory no. 23 on the ground that it seeks information that is not relevant to the EBS coverage issues and is not reasonably calculated to lead to the discovery of admissible evidence on these issues. The only issues raised by the contentions admitted for litigation in the Board's February 24 Memorandum and Order concern the coverage of LILCO's EBS stations within the 10-mile EPZ. The admitted contentions say nothing about the State EBS or how LILCO's EBS will operate in combination with it. Thus, Interrogatory no. 23 is outside the scope of the admitted contentions and is not likely to produce admissible evidence on the admitted contentions.

Notwithstanding and without waiving this objection, LILCO notes that the procedures for incorporating the State EBS into an emergency response are contained in OPIP 3.8.2 § 5.1.4 (Rev. 9), which LILCO distributed to the Intervenors on January 22, 1988.

Suffolk County Interrogatory No. 24

Identify all persons who participated in the drafting, designing, preparing, reviewing, revising, negotiating, or finalizing of LILCO's EBS plan.

Response: LILCO objects to Interrogatory no. 24 because it is irrelevant to the admitted coverage issues and is not reasonably calculated to lead to the discovery of admissible evidence on the coverage issues. Moreover, LILCO objects to this Interrogatory to the extent it purports to include counsel for LILCO who may have participated in activities concerning the Shoreham EBS.

Without waiving these objections, LILCO lists below the persons primarily involved in the listed activities, and the general role or function each performed:

Ira L. Freilicher	Policymaking; negotiation
Douglas M. Crocker	Policymaking; negotiation; procedure review
John A. Weismantle	Policymaking; negotiation; procedure review
Charles A. Daverio	Policymaking; negotiation; procedure review
Brant Aidikoff	Procedure drafting and developments
Vicki Palmiotto	Procedure review
Ralph E. Dippell, Jr.	Participation in coverage studies
Robert W. Guill	Participation in coverage studies
Sudhir K. Khanna	Participation in coverage studies

Suffolk County Interrogatory No. 25

Provide all documents concerning the drafting, designing, preparing, reviewing, revising, negotiating or finalizing of LILCO's EBS proposal.

Response: LILCO objects to Interrogatory no. 25 on relevance grounds, except to the extent it seeks documents concerning the coverage issues raised in the admitted contentions. Documents concerning "the drafting, designing, preparing, reviewing, revising, negotiating, or finalizing of LILCO's EBS proposal" are not relevant, except to the extent they address the adequacy of the EBS stations' broadcast coverage within the 10-mile EPZ.

Without waiving this objection, LILCO states that, to the best of its knowledge, there are no responsive documents in addition to those provided with the Nov. 6 summary disposition motion, LILCO's voluntary production of documents on March 1, and those referred to in connection with Interrogatory nos. 12, 14, 15, and 18. LILCO will continue to search for relevant documents and will promptly produce any that are found.

Suffolk County Interrogatory No. 26

One of the Cohen and Dippell reports contains information pertaining to WEZN, which is not a participating station in LILCO's EBS. Why was this study of WEZN conducted? Why is WEZN not included in LILCO's EBS? Provide all documents concerning whether or not to include WEZN in the EBS.

Response: LILCO objects to Interrogatory no. 26 on the grounds that it is not relevant to the admitted issues and is not reasonably calculated to lead to admissible evidence on the admitted issues. All that is at issue in this proceeding is the adequacy of broadcast coverage within the EPZ of the stations in the Shoreham EBS. As the Interrogatory expressly states, "WEZN is not a participating station in LILCO's EBS." Therefore, Interrogatory no. 26 is not relevant. Moreover, the Board ruled in its February 24 Memorandum and Order that evidence concerning WALK radio, the former lead EBS station, is irrelevant and will not be heard. A fortiori, evidence concerning WEZN, a station that is not participating in the EBS and never has participated in the EBS, is totally irrelevant to the issues open to litigation in this proceeding.

Suffolk County Interrogatory No. 27

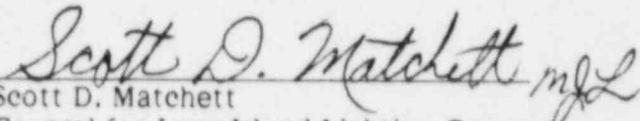
Provide copies of any documents relating to LILCO's EBS plan that were not previously produced or called for by the above.

Response: To the best of LILCO's knowledge, there are no other relevant documents relating to the coverage of the Shoreham EBS that were not already produced by LILCO or called for by Interrogatories 1-26.

Objections Stated by Counsel

All objections and references to objections were stated by counsel.

Respectfully submitted,

  
Scott D. Matchett  
Counsel for Long Island Lighting Company

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DATED: March 7, 1988

LILCO, March 7, 1988

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CERTIFICATE OF SERVICE

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

I hereby certify that copies of LILCO'S RESPONSES AND OBJECTIONS TO SUFFOLK COUNTY'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS REGARDING EMERGENCY BROADCAST SYSTEM were served this date upon the following by telecopier as indicated by one asterisk, by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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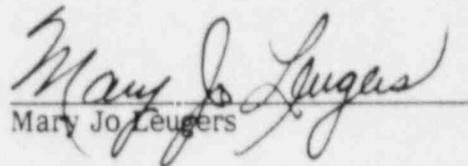
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DATED: March 7, 1988

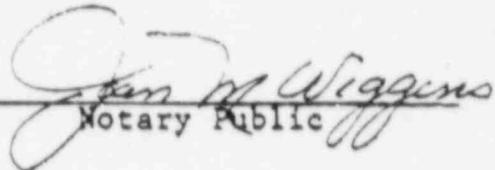
VERIFICATION

Douglas M. Crocker, being first duly sworn on oath, deposes and says: that he is currently the Manager, Nuclear Emergency Preparedness, Nuclear Operations Support Department for Long Island Lighting Company; that he has personal knowledge of a portion of the subject matter of this litigation; that responsible corporate employees have provided him with additional facts necessary to provide the information contained in the foregoing Answers to Interrogatories; that he has read the answers, and knows the contents thereof; and that based upon such information of which he has personal knowledge and with which he has been provided, he is informed and believes the matters stated therein to be true, and on these grounds alleges that the matters stated therein are true and therefore verifies the foregoing on behalf of Long Island Lighting Company.

  
\_\_\_\_\_  
Douglas M. Crocker

State of New York            SS:

I, Joan M. Wiggins, a Notary Public in and for the jurisdiction aforesaid, hereby certify that Douglas M. Crocker, whose name is signed to the foregoing Answers to Interrogatories, dated March 2, 1988, 1988, has personally sworn before me that the statements therein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Notary Public

JOAN M. WIGGINS  
NOTARY PUBLIC, State of New York  
No. 4859591  
Qualified in Nassau County  
Commission Expires September 15, 1988

My Commission expires: 9/15/88