UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Before the Commission

In the Matter of LONG ISLAND LIGHTING COMPANY (Shoreham Nuclear Power Station, Unit 1)

Docket No. 50-322-01-3 (Emergency Planning Proceedin

LILCO'S RESPONSE TO INTERVEORS' "SUPPLEMENT TO MOTION FOR NRC TO ESTABLISH POST-EXERCISE PROCEDURES"

LILCO opposes, and requests the Commission to dismiss summarily, the Intervenors' June 3, 1986 "Supplement to Motion for NRC to Establish Post-Exercise Procedures." The "Supplement" was not filed until fully six weeks after the occurrence of the most recent predicate fact recit d in it, and less than 48 hours before the Commission was due to hold a publicly noticed affirmation session on related matters concerning the February 13 Shoreham emergency preparedness exercise. Further, its request for relief is for the Commission to interpret and apply the regulations of an independent, coequal federal agency, FEMA, in a manner directly contrary to that chosen by that other agency. Finally, the stated goal of the "Supplement" -- providing an opportunity for a public airing of views on the February 13 exercise -- will be available to all concerned in the post-exercise litigation being so assiduously sought by intervenors.

The "Supplement" is untimely, frivolous and cynical. It should be summarily dismissed.

Respectfully submitted,

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DATED: June 5, 1986

CERTIFICATE OF SERVICE

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

I hereby certify that copies of LILCO'S RESPONSE TO INTERVE-NORS' "SUPPLEMENT TO MOTION FOR NRC TO ESTABLISH POST-EXERCISE PROCEDURES" were served this date upon the following by hand as indicated by one asterisk, by telecopier as indicated by two asterisks, or by first-class mail, postage prepaid.

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