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August 1, 1986

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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-5
	)	(EP Exercise)
(Shoreham Nuclear Power Station,	)	
Unit 1)	)	

SUFFOLK COUNTY, STATE OF NEW YORK, AND  
TOWN OF SOUTHAMPTON MEMORANDUM  
TRANSMITTING EXERCISE CONTENTIONS

In accordance with the schedule established by this Board in its July 11, 1986 Prehearing Conference Order, Suffolk County, the State of New York, and the Town of Southampton ("Governments") submit herewith their "Emergency Planning Contentions Relating to the February 13, 1986 Exercise." The Governments note the following concerning the contentions.

1. Each contention number is preceded by an "Ex" (i.e., "Contention Ex 1," "Contention Ex 2," etc.) in order to avoid possible confusion in the future between these exercise-related contentions and other contentions previously filed in this proceeding.

2. The contentions are organized under 11 general subject matter headings. Because the same exercise event or action often provides support for more than one contention (for example,

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LILCO's difficulty in handling road impediments itself demonstrates a fundamental flaw in LILCO's Plan and also supports the Governments' contention that there are fundamental flaws in LILCO's training program), there is necessarily some repetition in the stated contention bases. Cross references are utilized to reduce repetition.

3. As of the date of this filing, the Governments still have not received the documents generated by FEMA during the exercise, despite promises, beginning in February, that they would be provided. It is now 7 days after the so-called "outside" date for receipt of those documents as stated by FEMA's counsel during the July 8 prehearing conference. Such documents from FEMA are essential to a complete understanding of what actually went on during the exercise, particularly with respect to activities and observations of "simulators" and FEMA evaluators. Thus, the Governments reserve the right to amend, delete or otherwise modify these contentions, and to submit additional contentions, after the FEMA data become available.

4. In filing these contentions, the Governments do not waive their position that this exercise litigation should be terminated immediately for the reasons stated at the July 8 Prehearing Conference, and for the reasons specified in the Governments' Objections to the Prehearing Conference Order, dated July 24, 1986, as well as for reasons specified in earlier filings. The Governments urge this Board to rule promptly on the July 24 Objections.

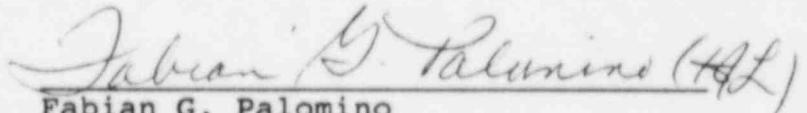
Respectfully submitted,

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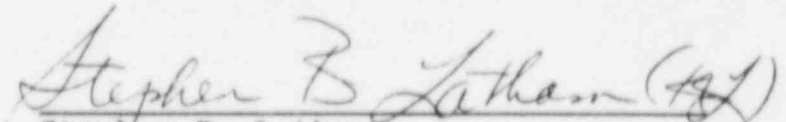
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NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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(Shoreham Nuclear Power Station, )  
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Docket No. 50-322-OL-5  
(EP Exercise)

Certificate of Service

I hereby certify that copies of the SUFFOLK COUNTY, STATE OF NEW YORK, AND TOWN OF SOUTHAMPTON MEMORANDUM TRANSMITTING EXERCISE CONTENTIONS" and the "EMERGENCY PLANNING CONTENTIONS RELATING TO THE FEBRUARY 13 EXERCISE" have been served on the following this 1st day of August 1986 by U.S. mail, first class, except as otherwise noted.

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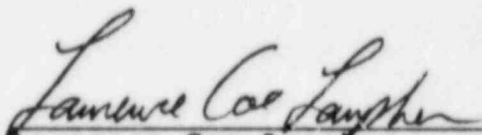
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