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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHBefore the Atomic Safety and Licensing BoardIn the Matter of)
)LONG ISLAND LIGHTING COMPANY)
)(Shoreham Nuclear Power Station,)
Unit 1))
)Docket No. 50-322-OL-5
(EP Exercise)RESPONSE OF SUFFOLK COUNTY, THE STATE OF NEW
YORK, AND THE TOWN OF SOUTHAMPTON TO LILCO'S
MOTION FOR LEAVE TO FILE A REPLY AND ATTACHED REPLY

On January 21, 1987 LILCO filed a document entitled "LILCO's Motion for Leave to File a Reply to Suffolk County Et Al's Response in Opposition to LILCO's Motion to Compel Regarding LILCO's First Request for Admissions and Third Set of Interrogatories" (hereafter, "Motion for Leave"). On the same date LILCO filed the referenced reply (hereafter, "Reply"). Suffolk County, the State of New York, and the Town of Southampton (hereafter, "Governments") hereby demonstrate that LILCO's Motion for Leave should be denied since LILCO has stated no justifiable reason for the Board to entertain an additional motion on this matter. Further, if the Board nevertheless decides to grant the Motion for Leave, the Governments hereby demonstrate that LILCO's Reply does not alter the fact that the Governments have already

responded as fully and adequately as possible to LILCO's discovery requests and that the LILCO Motion to Compel answers to the LILCO admissions and interrogatories¹ must therefore be denied.

I. THE BOARD SHOULD REJECT LILCO'S MOTION TO FILE A REPLY

According to NRC regulations, "[t]he moving party shall have no right to reply, except as permitted by the presiding officer or the Secretary or the Assistant Secretary." 10 CFR §2.730 (b)(3). LILCO, in requesting the Board to accept its Reply, fails to offer any substantial justification for filing the reply. Rather, in what is becoming standard LILCO practice,² LILCO stubbornly insists on rehashing old arguments and thus prolonging an already demanding course of litigation. In the context of LILCO's frequent complaints over delay, it is clear that LILCO's insistence on repeated pleadings on the same subject

¹ LILCO's Motion to Compel Suffolk County, the State of New York, and the Town of Southampton to Respond to LILCO's First Request for Admissions and Third Set of Interrogatories and Request for Expedited Response and Disposition, January 5, 1987 (hereafter, "Motion to Compel").

² In recent weeks, LILCO has repeatedly sought leave to reply to the Governments' pleadings or sought reconsideration of various orders in both the OL-5 and OL-3 proceedings. See LILCO's Reply to New York State's Response to LILCO's Motion Requesting Issuance of Subpoenas, and Motion for Leave to File (OL-5); LILCO's Motion for Reconsideration of the Board's January 14, 1987 Order (OL-3); LILCO's Motion to File Reply on the Need for Commission Review of ALAB-855 (OL-3); LILCO's Motion Concerning Prehearing Schedule (OL-5).

is in fact the cause of the burden of this litigation. When LILCO's shrill rhetoric is also taken into consideration, the LILCO pleadings become even more objectionable.

LILCO's purported reason for seeking leave to reply is that it did not anticipate one of the arguments in the Governments' Response nor that the Governments would "flesh out" arguments that LILCO did anticipate. This cannot serve as justification for filing the Reply. First, LILCO admits that it anticipated all but one of the reasons raised by the Governments in opposition to the Motion to Compel. Thus, LILCO has no justifiable reason for being allowed to reply to the Governments' Response with regard to those matters. Further, as to the matter LILCO claimed it could not anticipate, the mere fact that LILCO failed to anticipate an argument by the Governments in response to LILCO's claim that the timeline was a "complete chronology" is LILCO's own fault. LILCO was, or should have been, aware when it filed the Motion to Compel that the timeline contained numerous omissions and inaccuracies. The fact that LILCO chose to wait for the Governments to offer examples prior to addressing this issue was LILCO's choice.

LILCO's Motion for Leave should also be denied because it does nothing, with one exception, other than rehash old arguments made in LILCO's Motion to Compel. The one exception is where LILCO attempts, through the use of word games, to try to explain and make light of the numerous inaccuracies and omissions present in their timeline.

If the Board decides, nevertheless, to grant LILCO's Motion for Leave, the Governments are compelled to stress that LILCO's Reply does nothing to alter the fact that the Governments have already replied as fully and adequately as possible to LILCO's Requests for Admission. These reasons were discussed in detail in the Governments' Response of January 15, 1987. The Governments thus only briefly respond to the merits of LILCO's Reply in the discussion which follows.

II. DISCUSSION

A. LILCO's Reply Does Not Alter the Fact that the Timeline Contains Numerous Omissions

LILCO asserts that the timeline is "a complete chronology of the events on the day of the Exercise that were noted on message forms or in players' log books." (Motion to Compel at 4). Despite this assertion, the fact remains that the timeline contains numerous omissions. In the Governments' January 15 Response, the Governments provided four examples of specific entries on message forms that were left off of the timeline. See Governments' Response, Attachments A, C, E and G. In its Reply, LILCO claims that the Governments "are unable to find certain entries not because LILCO omitted them, but because they do not (or will not) look in the appropriate location." (LILCO's Reply at 7).

However, despite this accusation, LILCO was unable to demonstrate that those entries were included in the timeline. Thus, LILCO failed, in its Reply, to prove that any of the omitted entries were, in fact, included. Instead, LILCO attempted to cover up this fact by spending two pages of its Reply noting the location of three different entries on the timeline and ignoring the fact that the four examples noted by the Governments were not included.

Careful review of LILCO's Reply demonstrates that LILCO has attempted, through the use of a word game, to cover up the fact that the entries set forth by the Governments in the Governments' Response were not included on the timeline. What LILCO does in its Reply is to first claim that the "entries" were not omitted. Then, rather than demonstrate where on the timeline those entries are located, LILCO sets forth proof of where completely different entries on the same "message forms" as the omitted entries can be found.

An example of how LILCO attempts to cover up omissions can be found at page 7 of LILCO's Reply. LILCO claims that the "message form" containing an entry reading "send dosimetry record keeper to Peconic Ambulance Jamesport Yard - Call (me) when arrived (sic)" (see Attachment E of the Governments' Response) "was not omitted from the timeline." While this statement, literally read, is accurate, it merely clouds over the fact that the specific entry was omitted. What was included was another, unrelated entry concerning an event that occurred at a different

time than the one noted above and that happened to appear on the same message form. Thus, the reason the Governments could not find this entry was not because, as LILCO claims, the Governments did not (or would not) look in the appropriate location (see LILCO Reply at 7), but rather because LILCO failed to include it.

LILCO attempts to make light of this omission by noting that the information in the omitted entry was included in the timeline because it also appeared in a log book and in another player's message form. However, the purpose of the timeline, according to LILCO, is to serve as a "complete chronology of the events on the day of the exercise." See Motion to Compel at 4. By leaving out certain communications and events, however, LILCO has created a document that is merely a partial chronology. It provides no basis for determining the ability of LERO players to communicate with one another or the adequacy of training with regard to such communications. Such a document can serve no purpose.

LILCO's explanation for why it omitted entries is that "(s)eparate timeline entries were usually not created for every thought or every secondary message recorded on each message form." See LILCO Reply at 6, n.10. This is merely another LILCO word game. By "secondary" LILCO neither means that the omitted entry relates to another entry that was included on the timeline nor that the omitted entry occurred at a later time during the day than the included entry. All that "secondary" means is that the entry was the second one entered on the form. For example, a 10:24 a.m. LERO message to the Staging Areas from the Lead Com-

municator which reads: "Sirens sounded/EBS message instructing public to evacuate zones A-M, Q R" was omitted from the timeline. LILCO justifies this by pointing out that a different entry, describing a totally different event that occurred at 10:30, was included. LILCO claims that the other entry, relating to the time the reception center was activated, was the "primary message" simply because it was the first one that appeared on the form. See LILCO Reply at 7. Thus, LILCO argues that leaving an entry off the timeline concerning sirens and EBS messages relating to evacuation is acceptable because LILCO included a different, unrelated entry from the same message form. That obviously is a material omission which LILCO's word games cannot hide.

It is particularly troublesome that LILCO left off this entry when one considers the fact that LILCO included the other entry on the same message form on the timeline five times. See LILCO Reply at 7. LILCO explains that "for completeness," an entry from a message form was included on the timeline as many times as there were people who had copies of the message form at the end of the exercise. See LILCO Reply at 8, n.12. How LILCO can justify including one entry on a message form five times while leaving another entry off entirely is difficult to understand. The result is a document that contains many repeated entries and fails to include some at all.

Another example cited by the Governments of an omitted entry must be addressed because of LILCO's mischaracterization of the omitted entry. LILCO justifies the omission by claiming that the "entry" "is merely a scribbled notation." See LILCO Reply at 6. Review of the entry, however, reveals that it is far from a "scribbled notation." Rather, the omitted entry is written in print and in all capital letters (see Governments' Response, Attachment A). The only "scribbled notation" is the entry that LILCO chose to include in the timeline. Obviously, the LERO player that wrote the two entries wanted the one that LILCO chose to omit to stand out. The Board clearly must reject LILCO's claim that this entry was merely a "scribbled notation."

The final omission noted by the Governments, an entry that lacked both a date and a time (see Governments' Response, Attachment G) is not contested by LILCO. Obviously LILCO was unable to find anything from this message form on the timeline.

In sum, the timeline clearly contains many omissions. Even LILCO now must admit this fact. Thus while LILCO still claims that the timeline "provides a complete chronology of the events on the day of the Exercise" (see Reply at 6), in the very next sentence LILCO admits that the timeline only reflects those events that LILCO determined were "important events" and leaves out those events that LILCO unilaterally decided were "immaterial activities." See Reply at 6. This contradiction by LILCO is an attempt to recharacterize the timeline and to provide after-the-fact excuses for the plain deficiencies in the timeline. How-

ever, LILCO's rationalizations cannot cure the timeline. A review of the omissions cited by the Governments reveals that the entries left off the timeline did not deal with "unimportant events." Rather, these entries depicted events such as equipment failing to work, sirens being sounded, events pertaining to EBS messages, and dosimetry record keepers and nurses being dispatched. See Governments' Response, Attachments A, C, E, and G. That LILCO would argue such events are immaterial or not relevant is absurd. The Board must remember LILCO itself asserted that "all events that occurred during the Exercise [are] potentially relevant both to the issue of problems that occurred and to the issue of whether the problems were pervasive." Motion to Compel at 6.

What becomes clear in the Reply is what the Governments have contended all along: the timeline was produced by secretaries in the offices of LILCO's attorneys and is incomplete and fraught with numerous omissions. Based on a review of the examples cited in the Governments' Response as well as LILCO's admission that it left out events and entries on message forms from the timeline, there can be no doubt that the timeline is far from the "complete chronology" LILCO contends it is. LILCO does not have the right to request the Governments to admit that the timeline is a complete chronology of the events that occurred on the day of the exercise when LILCO knows that the timeline is not complete. LILCO merely wants the Governments to tell it which events were

left out by the secretaries at the offices of Hunton & Williams who compiled the timeline. The Governments need not do LILCO's work.

B. LILCO's Reply Does Not Alter the Fact that the Timeline Contains Numerous Inaccuracies

In LILCO's Reply, LILCO attempts to make light of the fact that the summaries of entries on message forms contain numerous inaccuracies. Although it is unnecessary to review each of these inaccuracies in this pleading (they were fully discussed in the Governments' January 15 Response), certain examples of LILCO's attempt to make light of significant omissions must be pointed out.

In one case, the Governments noted an incomplete summary of a message from the Traffic Control Coordinator at the EOC to the Evacuation Coordinator at the EOC. See Attachments H and I of the Governments' Response. LILCO does not even address the summary of this message in its Reply. Rather, LILCO notes that the summaries of a different message form and an entry in the "LC Log" concerning the same event provide adequate summaries. Reply at 8. This is immaterial, however, to the fact that the cited message form was not properly summarized. Further, if these are all summaries of the same message form, as LILCO claims (see Reply at 8, n.12), why are there three separate entries, each characterizing the message differently on the timeline? This underscores the fact that the characterizations offered by LILCO

have been entered without any thought. The Governments do not have to waste time reviewing haphazardly written characterizations of message forms prepared by LILCO.

In another example, LILCO claims that a message form from the Road Logistics Coordinator to Road Crew 2008 was accurately summarized. Reply at 9. However, a review of the message form itself (which is Attachment J of the Governments' Response) against LILCO's summary of that message form (see Attachment K of the Governments' Response) reveals that this is not the case. Rather, this message form leaves out critical information. The information LILCO chose to leave off the timeline was the part of the message that reads: "Lost contact with 3008 after calling in with site problem." It appears that LILCO believes it is acceptable to summarize messages by only including the aspects of the message that do not demonstrate problems that occurred during the exercise.

In yet another example of an inaccurate summary, LILCO's characterization completely changed what the message stated. In this situation, LILCO summarized a message that stated that pages 1 through 9 of the Homebound Evacuation List have been contacted, as "All homebound residents have been contacted . . ." (see Governments' Response, Attachments N and O). LILCO claims that the "omission of the page reference in the summary does not detract materially from the timeline's accuracy." See LILCO's Reply at 10. This is untrue. The fact that the message indicated that some of the people on the list were contacted and

the summary indicates that all of the people on the list were contacted is clearly an inaccuracy³ that cannot be passed off as immaterial.

The foregoing are just a few of the inaccuracies that LILCO attempts to cover up in the Reply. However, a review of the examples provided by the Governments indicates that the summaries provided by LILCO are not only inaccurate, but also frequently leave out critical information.

The Board must reject the Motion to Compel. No party should be required to devote scarce resources to respond to a document that is full of inaccuracies. Nor do the Governments have to accept characterizations of events thought up at the offices of LILCO's counsel. For the Governments to be forced now to go through and accurately characterize these messages would be asking the Governments to do LILCO's work. That is not proper.

C. LILCO's Allegation That The Governments' Review Was Selective Is Inaccurate And Immaterial

LILCO alleges that the Governments deliberately choose to review LERO message forms as opposed to player logs in some kind of effort to bias the results. See LILCO Reply at 8. This is both inaccurate and immaterial. The Governments review of

³ As the Governments indicated in the Governments' Response, without knowledge concerning how long the list is, it is impossible to determine how material LILCO's mischaracterization really is. LILCO failed to provide this information in the Reply.

message forms was entirely random. A stack of message forms was pulled out of the files and reviewed in order. There was nothing "selective" about this process.

Further, the Suffolk County attorney who undertook the initial review of the timeline chose to review message forms for a number of reasons. First, message forms appear to make up a greater proportion of the timeline than any individual log. Second, unlike logs that only indicate the limited observations of one LERO player, the message forms supposedly indicate all of the communications that occurred between various LERO players. Thus, the message forms were more likely to provide a superior view of the timeline than any individual log would. Third, and most important, many of the logs are difficult to read. Some are illegible. For example, the log of the lead communicator, one of the most cited in the timeline, is impossible to read. This made review of this log unfeasible. (See Attachment A). Thus, reviewing LERO message forms was a logical place to start.

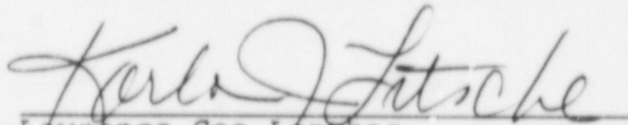
Finally, the fact remains that the Governments did find numerous omissions and inaccuracies in the timeline created by LILCO. That the documents the Governments reviewed demonstrated this is all that matters. It is irrelevant that some other entries on the timeline, ascertained from logs, may contain less inaccuracies and omissions.

III. CONCLUSION

LILCO's Reply does nothing other than to rehash arguments put forward in the Motion to Compel and to attempt to cover up and make light of the fact that LILCO's timeline is fraught with omissions and inaccuracies. As previously noted, the timeline was not prepared by LILCO's attorneys. It clearly was never carefully checked by LILCO for its accuracy. LILCO is now requesting the Governments' attorneys to go through the timeline and to inform LILCO of all the omissions and inaccuracies in the document. The Governments will not do LILCO's work for it. Further, LILCO has admitted that the timeline is a selective timeline that includes characterizations by LILCO of those events and activities that LILCO believes are important. The Governments should not have to respond to such a request.

Respectfully submitted,

Martin Bradley Ashare
Suffolk County Attorney
Building 158 North County Complex
Veterans Memorial Highway
Hauppauge, New York 11788



Lawrence Coe Lanpher
Karla J. Letsche
Michael S. Miller
KIRKPATRICK & LOCKHART
1800 M Street, N.W.
South Lobby - 9th Floor
Washington, D.C. 20036-5891

Attorneys for Suffolk County

Fabian G. Palomino (FGL)

Fabian G. Palomino
Special Counsel to the Governor
of the State of New York
Executive Chamber, Room 229
Capitol Building
Albany, New York 12224

Attorney for Mario M. Cuomo,
Governor of the State of New York

Stephen B. Latham (FGL)

Stephen B. Latham
Twomey, Latham & Shea
P.O. Box 398
33 West Second Street
Riverhead, New York 11901

Attorney for the Town of
Southampton

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
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In the Matter of)
)

LONG ISLAND LIGHTING COMPANY)
)

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

Docket No. 50-322-OL-5
(EP Exercise)

CERTIFICATE OF SERVICE

I hereby certify that copies of RESPONSE OF SUFFOLK COUNTY, THE STATE OF NEW YORK, AND THE TOWN OF SOUTHAMPTON TO LILCO'S MOTION FOR LEAVE TO FILE A REPLY AND ATTACHED REPLY have been served on the following this 2nd day of February 1987 by U.S. mail, first class, except as otherwise noted.

John H. Frye, III, Chairman*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

William R. Cumming, Esq.
Spence W. Perry, Esq.
Office of General Counsel
Federal Emergency Management Agency
500 C Street, S.W., Room 840
Washington, D.C. 20472

Anthony F. Earley, Jr., Esq.
General Counsel
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

Elisabeth Taibbi
Clerk
Suffolk County Legislature
Suffolk County Legislature
Office Building
Veterans Memorial Highway
Hauppauge, New York 11788

Mr. L. F. Britt
Long Island Lighting Company
Shoreham Nuclear Power Station
North Country Road
Wading River, New York 11792

Ms. Nora Bredes
Executive Director
Shoreham Opponents Coalition
195 East Main Street
Smithtown, New York 11787

Mary M. Gundrum, Esq.
New York State Department of Law
120 Broadway, 3rd Floor
Room 3-116
New York, New York 10271

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Martin Bradley Ashare, Esq.
Suffolk County Attorney
Bldg. 158 North County Complex
Veterans Memorial Highway
Hauppauge, New York 11788

Mr. Jay Dunkleburger
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Joel Blau, Esq.
Director, Utility Intervention
N.Y. Consumer Protection Board
Suite 1020
Albany, New York 12210

W. Taylor Reveley, III, Esq.*
Hunton & Williams
P.O. Box 1535
707 East Main Street
Richmond, Virginia 23212

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
Riverhead, New York 11901

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Comm.
1717 H Street, N.W.
Washington, D.C. 20555

Hon. Michael LoGrande
Suffolk County Executive
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11788

Dr. Monroe Schneider
North Shore Committee
P.O. Box 231
Wading River, New York 11792

Fabian G. Palomino, Esq.
Special Counsel to the Governor
Executive Chamber, Rm. 229
State Capitol
Albany, New York 12224

Bernard M. Bordenick, Esq.*
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

David A. Brownlee, Esq.
Kirkpatrick & Lockhart
1500 Oliver Building
Pittsburgh, Pennsylvania 15222

Mr. Stuart Diamond
Business/Financial
NEW YORK TIMES
229 W. 43rd Street
New York, New York 10036

Michael S. Miller

Michael S. Miller
KIRKPATRICK & LOCKHART
1800 M Street, N.W.
South Lobby - 9th Floor
Washington, D.C. 20036-5891

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** By Federal Express

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93	10:42	Coord. Bn. Cont. Under for connection to next stage	
94	10:42	Coord. Bn. Cont. Under for connection to next stage	
95	10:42	Coord. Bn. Cont. Under for connection to next stage	
96	10:42	Coord. Bn. Cont. Under for connection to next stage	
97	10:42	Coord. Bn. Cont. Under for connection to next stage	
98	10:42	Coord. Bn. Cont. Under for connection to next stage	
99	10:42	Coord. Bn. Cont. Under for connection to next stage	
100	10:42	Coord. Bn. Cont. Under for connection to next stage	
101	10:42	Coord. Bn. Cont. Under for connection to next stage	
102	10:42	Coord. Bn. Cont. Under for connection to next stage	
103	10:42	Coord. Bn. Cont. Under for connection to next stage	
104	10:42	Coord. Bn. Cont. Under for connection to next stage	
105	10:42	Coord. Bn. Cont. Under for connection to next stage	
106	10:42	Coord. Bn. Cont. Under for connection to next stage	
107	10:42	Coord. Bn. Cont. Under for connection to next stage	
108	10:42	Coord. Bn. Cont. Under for connection to next stage	
109	10:42	Coord. Bn. Cont. Under for connection to next stage	
110	10:42	Coord. Bn. Cont. Under for connection to next stage	
111	10:42	Coord. Bn. Cont. Under for connection to next stage	
112	10:42	Coord. Bn. Cont. Under for connection to next stage	
113	10:42	Coord. Bn. Cont. Under for connection to next stage	
114	10:42	Coord. Bn. Cont. Under for connection to next stage	
115	10:42	Coord. Bn. Cont. Under for connection to next stage	
116	10:42	Coord. Bn. Cont. Under for connection to next stage	
117	10:42	Coord. Bn. Cont. Under for connection to next stage	
118	10:42	Coord. Bn. Cont. Under for connection to next stage	
119	10:42	Coord. Bn. Cont. Under for connection to next stage	
120	10:42	Coord. Bn. Cont. Under for connection to next stage	

2/13/86

2/13/86

20002320

Message	Time	From	To
1	10:00	John	John
2	10:05	John	John
3	10:10	John	John
4	10:15	John	John
5	10:20	John	John
6	10:25	John	John
7	10:30	John	John
8	10:35	John	John
9	10:40	John	John
10	10:45	John	John
11	10:50	John	John
12	10:55	John	John
13	11:00	John	John
14	11:05	John	John
15	11:10	John	John
16	11:15	John	John
17	11:20	John	John
18	11:25	John	John
19	11:30	John	John
20	11:35	John	John
21	11:40	John	John
22	11:45	John	John
23	11:50	John	John
24	11:55	John	John
25	12:00	John	John
26	12:05	John	John
27	12:10	John	John
28	12:15	John	John
29	12:20	John	John
30	12:25	John	John
31	12:30	John	John
32	12:35	John	John
33	12:40	John	John
34	12:45	John	John
35	12:50	John	John
36	12:55	John	John
37	1:00	John	John
38	1:05	John	John
39	1:10	John	John
40	1:15	John	John
41	1:20	John	John
42	1:25	John	John
43	1:30	John	John
44	1:35	John	John
45	1:40	John	John
46	1:45	John	John
47	1:50	John	John
48	1:55	John	John
49	2:00	John	John
50	2:05	John	John
51	2:10	John	John
52	2:15	John	John
53	2:20	John	John
54	2:25	John	John
55	2:30	John	John
56	2:35	John	John
57	2:40	John	John
58	2:45	John	John
59	2:50	John	John
60	2:55	John	John
61	3:00	John	John
62	3:05	John	John
63	3:10	John	John
64	3:15	John	John
65	3:20	John	John
66	3:25	John	John
67	3:30	John	John
68	3:35	John	John
69	3:40	John	John
70	3:45	John	John
71	3:50	John	John
72	3:55	John	John
73	4:00	John	John
74	4:05	John	John
75	4:10	John	John
76	4:15	John	John
77	4:20	John	John
78	4:25	John	John
79	4:30	John	John
80	4:35	John	John
81	4:40	John	John
82	4:45	John	John
83	4:50	John	John
84	4:55	John	John
85	5:00	John	John
86	5:05	John	John
87	5:10	John	John
88	5:15	John	John
89	5:20	John	John
90	5:25	John	John
91	5:30	John	John
92	5:35	John	John
93	5:40	John	John
94	5:45	John	John
95	5:50	John	John
96	5:55	John	John
97	6:00	John	John
98	6:05	John	John
99	6:10	John	John
100	6:15	John	John

20002321

Misc #	Time	From	To	Message
196	1300	SPAC SAC	SPAC SAC	let of handwritten notes since 12:30
197	1315	SPAC SAC	SPAC SAC	correlation may be of interest
198	1330	SPAC SAC	SPAC SAC	frank talk about off record
199	1345	SPAC SAC	SPAC SAC	lead com-2211 fuel still cleared
200	1345	SPAC SAC	SPAC SAC	have a glatter - 11. 11. 11
201	1510	SPAC SAC	SPAC SAC	Zone picking up Zone 1000 pick up
202	1510	SPAC SAC	SPAC SAC	contact SAC under at 1510
203	1527	SPAC SAC	SPAC SAC	Want up rate zone 1523
204	1530	SPAC SAC	SPAC SAC	Term complete in Patch
205	1540	SPAC SAC	SPAC SAC	additional elections
206	1545	SPAC SAC	SPAC SAC	Zone Picking - Zone 1000 pick up
207	1545	SPAC SAC	SPAC SAC	Pick up zone 1000 pick up
208	1550	SPAC SAC	SPAC SAC	Pick up zone 1000 pick up
209	1550	SPAC SAC	SPAC SAC	Pick up zone 1000 pick up
210	1600	SPAC SAC	SPAC SAC	7150 page marked to be read
211	1605	SPAC SAC	SPAC SAC	monitoring team of 1000 pick up
212	1605	SPAC SAC	SPAC SAC	salesman contact at 1605
213	1605	SPAC SAC	SPAC SAC	notice personal report 1605
214	1613	SPAC SAC	SPAC SAC	notice personal report 1613
215	1613	SPAC SAC	SPAC SAC	notice personal report 1613
216	1620	SPAC SAC	SPAC SAC	Plant update at 1613
217	1627	SPAC SAC	SPAC SAC	9600 zone 1000 pick up, 576000
218	1627	SPAC SAC	SPAC SAC	call
219	1627	SPAC SAC	SPAC SAC	Decision for 2nd 1627
220	1627	SPAC SAC	SPAC SAC	1627 the area 1627
221	1627	SPAC SAC	SPAC SAC	merge advance for 1627
222	1627	SPAC SAC	SPAC SAC	1627 the area 1627
223	1627	SPAC SAC	SPAC SAC	1627 the area 1627
224	1627	SPAC SAC	SPAC SAC	1627 the area 1627
225	1627	SPAC SAC	SPAC SAC	1627 the area 1627
226	1627	SPAC SAC	SPAC SAC	1627 the area 1627
227	1627	SPAC SAC	SPAC SAC	1627 the area 1627
228	1627	SPAC SAC	SPAC SAC	1627 the area 1627
229	1627	SPAC SAC	SPAC SAC	1627 the area 1627
230	1627	SPAC SAC	SPAC SAC	1627 the area 1627
231	1627	SPAC SAC	SPAC SAC	1627 the area 1627
232	1627	SPAC SAC	SPAC SAC	1627 the area 1627
233	1627	SPAC SAC	SPAC SAC	1627 the area 1627
234	1627	SPAC SAC	SPAC SAC	1627 the area 1627
235	1627	SPAC SAC	SPAC SAC	1627 the area 1627
236	1627	SPAC SAC	SPAC SAC	1627 the area 1627
237	1627	SPAC SAC	SPAC SAC	1627 the area 1627
238	1627	SPAC SAC	SPAC SAC	1627 the area 1627
239	1627	SPAC SAC	SPAC SAC	1627 the area 1627
240	1627	SPAC SAC	SPAC SAC	1627 the area 1627
241	1627	SPAC SAC	SPAC SAC	1627 the area 1627
242	1627	SPAC SAC	SPAC SAC	1627 the area 1627
243	1627	SPAC SAC	SPAC SAC	1627 the area 1627
244	1627	SPAC SAC	SPAC SAC	1627 the area 1627
245	1627	SPAC SAC	SPAC SAC	1627 the area 1627
246	1627	SPAC SAC	SPAC SAC	1627 the area 1627
247	1627	SPAC SAC	SPAC SAC	1627 the area 1627
248	1627	SPAC SAC	SPAC SAC	1627 the area 1627
249	1627	SPAC SAC	SPAC SAC	1627 the area 1627
250	1627	SPAC SAC	SPAC SAC	1627 the area 1627
251	1627	SPAC SAC	SPAC SAC	1627 the area 1627
252	1627	SPAC SAC	SPAC SAC	1627 the area 1627
253	1627	SPAC SAC	SPAC SAC	1627 the area 1627
254	1627	SPAC SAC	SPAC SAC	1627 the area 1627
255	1627	SPAC SAC	SPAC SAC	1627 the area 1627
256	1627	SPAC SAC	SPAC SAC	1627 the area 1627
257	1627	SPAC SAC	SPAC SAC	1627 the area 1627
258	1627	SPAC SAC	SPAC SAC	1627 the area 1627
259	1627	SPAC SAC	SPAC SAC	1627 the area 1627
260	1627	SPAC SAC	SPAC SAC	1627 the area 1627
261	1627	SPAC SAC	SPAC SAC	1627 the area 1627
262	1627	SPAC SAC	SPAC SAC	1627 the area 1627