

2451

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'87 FEB -6 A10:02

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,)	
Unit 1))	

LILCO'S SECOND SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS REGARDING
RECEPTION CENTERS TO SUFFOLK COUNTY AND NEW YORK STATE

Long Island Lighting Company, by its counsel, propounds the following interrogatories to Suffolk County and New York State ("Intervenor" or "The Intervenors") pursuant to §§ 2.740, 2.740b, and 2.741 of the Nuclear Regulatory Commission's Rules of Practice. By propounding these interrogatories LILCO makes no admission or representation about the proper scope of the issues to be decided or that the evidence that may be presented on the adequacy of LILCO's proposed reception centers.

INSTRUCTIONS

Please adhere to the Instructions and Definitions in LILCO's First Set of Interrogatories and Request for Production of Documents Regarding Reception Centers to Suffolk County and New York State, dated January 16, 1987.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Identification of Witnesses and Documents

13. Please answer Nos. 1-8 of the First Set of Interrogatories dated January 16, 1987.

DS03

Factors Alleged to Make the Reception Centers Unsuitable

14. In your January 30, 1987, Response to LILCO's First Set of Interrogatories you say (p. 5) that "[t]he number of persons who will arrive at LILCO's reception centers is much larger than those reception centers (and the facilities, resources, and personnel committed to them) can serve." What number, in the Intervenor's view, is "the number of persons who will arrive at LILCO's reception centers"?
15. What are the "facilities" and "resources" that you are referring to in the passage quoted above?
16. Do the Intervenor's claim that the number of people referred to in Interrogatory 14 above must be monitored within about 12 hours in order to comply with NRC regulations?
17. Do the Intervenor's claim that LILCO must be prepared to decontaminate the number of people asked for in Interrogatory 14 above within about 12 hours in order to comply with NRC regulations?
18. You say in your January 30 Response (p. 5) that "[t]raffic congestion on the way to and in the vicinity of the facilities will render the reception centers ineffective." What studies or analyses support this statement? Please provide copies.
19. You say in your January 30 Response (p. 6) that LILCO's traffic management system, including the use of LILCO's Traffic Guides, is inadequate. Precisely how is it inadequate? What would make it adequate?
20. You say in your January 30 Response (p. 6) that "[t]ransportation and traffic problems will develop as a result of the reception centers' locations and their distance from the EPZ." Precisely what "problems" do you refer to?

21. You say in your January 30 Response (p. 6) that LILCO's proposed monitoring procedures are inadequate. Precisely how are they inadequate and why do they not, in your words, "provide reasonable assurance that all evacuees arriving at the reception centers to be monitored will be monitored, and that contaminated persons will be identified, in a timely manner"?
22. Is there any way in which LILCO's proposed monitoring procedures could be made adequate in the Intervenor's view? If so, how?
23. You say in your January 30 Response (p. 6) that "inadequate shelter" not only "affects the public health" but "under certain circumstances will render LILCO's monitoring procedures ineffective." Precisely how does it affect the public health, and what "circumstances" do you refer to? How will those "circumstances" render LILCO's monitoring procedures ineffective?
24. In your January 30 Response (p. 6) you say that the reception centers and their "facilities" and the "resources" provided by LILCO are physically inadequate. What "facilities" and "resources" are you referring to?
25. In your January 30 Response (p. 6) you say that the reception centers and their facilities and the resources provided by LILCO are physically inadequate to provide "other necessary services" to evacuees. List all such "necessary services" to which you refer.
26. In your January 30 Response (p. 6) you say that LILCO has provided inadequate staff. What would make LILCO's staff adequate? How many people do the Intervenor's believe should be provided for monitoring, decontamination, and other purposes?
27. In your January 30 Response in your Response 9(h) on page 6, what are the "other purposes" to which you refer?

28. In your January 30 Response you say that LILCO's proposal to transport all evacuees traveling on buses to the parking lot next to its Hicksville facility renders that facility inadequate. Precisely how is it inadequate?
29. In your January 30 Response (p. 7) you say that the "proposal to send the evacuees to the LILCO parking lots can never be implemented in a way to protect the public health and safety." Why not?
30. In your January 30 Response (p. 7) you say that the "reception centers locations will give rise to a larger evacuation shadow phenomenon, as well as inhibiting evacuation and the timely processing of the evacuees at the reception centers." Precisely how do the locations affect the so-called "shadow phenomenon"?
31. How will the alleged larger "shadow phenomenon" inhibit the timely processing of the evacuees?
32. In your January 30 Response (p. 7) you say that the use of the reception centers threatens to contaminate water supplies. What studies or analyses support this statement? Please provide copies.
33. In your January 30 Response (p. 7) you say that "waste products from the decontamination procedures could pose additional environmental hazards." What "waste products" do you refer to, and what additional "environmental hazards" do you refer to?
34. In your January 30 Response (p. 7) you say that the "distance of the three facilities from the EPZ will increase the adverse health effects of those exposed to radiation during an accident." Is the Intervenor's position that the distance of the LILCO facilities from the EPZ is categorically too great as a matter of law? Or is your position that they are too far because of particular conditions on Long Island? If the latter, what are those particular conditions?

35. You say in your January 30 Response (p. 7) that "LILCO cannot lawfully use its facilities as relocation centers." Please state what laws Intervenor claim would prevent LILCO from using its facilities as relocation centers.
36. At transcript page 16010 of the Shoreham emergency planning hearings FEMA witness Keller referred to a letter written by the Environmental Protection Agency to the State of New York addressing the release of contaminated washwater to sewer systems. Mr. Keller believed this was in connection with the Nine Mile Point Station. Please provide a copy of the letter.

Other Nuclear Power Plants

37. For each of the other operating nuclear power plants in New York State, please state (a) the capacity of the relocation centers provided for an emergency at the plant to monitor people and vehicles for radioactive contamination within about 12 hours and (b) their capacity to decontaminate people and vehicles, either within about 12 hours or within such other times as you have information for.
38. For each operating nuclear power plant in New York State other than Shoreham, are any of the relocation centers required to (a) have an SPDES permit or (b) have an environmental impact statement prepared under SEQRA or other state law?
39. For each of the other operating nuclear power plants in New York State, has anyone addressed the question whether the use of the relocation centers for monitoring and possible decontamination would violate local zoning laws or other state or local laws? If anyone has addressed this question for any relocation center in New York State, please provide any documents addressing the question. Please identify any people who have addressed or analyzed this question for relocation centers in New York State.

Respectfully submitted,


James N. Christman

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

DATED: February 4, 1987

DOCKETED
USNR

CERTIFICATE OF SERVICE

'87 FEB -6 A10:02

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 Second Set of Interrogatories and Requests for Production of Documents Regarding Reception Centers to Suffolk County and New York State 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.

Morton B. Margulies, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
East-West Towers, Rm. 407
4350 East-West Hwy.
Bethesda, MD 20814

Dr. Jerry R. Kline
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
East-West Towers, Rm. 427
4350 East-West Hwy.
Bethesda, MD 20814

Mr. Frederick J. Shon
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory Commission
East-West Towers, Rm. 430
4350 East-West Hwy.
Bethesda, MD 20814

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

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bernard M. Bordeniek, Esq. **
Oreste Russ Pirfo, Esq.
Edwin J. Reis, Esq.
U.S. Nuclear Regulatory Commission
7735 Old Georgetown Road
(to mailroom)
Bethesda, MD 20814

Herbert H. Brown, Esq. **
Lawrence Coe Lanpher, Esq.
Karla J. Letsche, Esq.
Kirkpatrick & Lockhart
South Lobby - 9th Floor
1800 M Street, N.W.
Washington, D.C. 20036-5891

Fabian G. Palomino, Esq. **
Richard J. Zahnleuter, Esq.
Special Counsel to the Governor
Executive Chamber
Room 229
State Capitol
Albany, New York 12224

Mary Gundrum, Esq.
Assistant Attorney General
120 Broadway
Third Floor, Room 3-116
New York, New York 10271

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

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

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
P.O. Box 298
Riverhead, New York 11901

Mr. Philip McIntire
Federal Emergency Management
Agency
26 Federal Plaza
New York, New York 10278

Jonathan D. Feinberg, Esq.
New York State Department of
Public Service, Staff Counsel
Three Rockefeller Plaza
Albany, New York 12223

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

Gerald C. Crotty, Esq.
Counsel to the Governor
Executive Chamber
State Capitol
Albany, New York 12224

Martin Bradley Ashare, Esq. **
Eugene R. Kelly, Esq.
Suffolk County Attorney
H. Lee Dennison Building
Veterans Memorial Highway
Hauppauge, New York 11787

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

Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, Virginia 23212

DATED: February 4, 1987


James N. Christman