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February 19, 1987

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'87 FEB 20 P3:54

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)	)	

NRC STAFF FIRST SET OF INTERROGATORIES AND  
REQUESTS TO PRODUCE OF SUFFOLK COUNTY,  
STATE OF NEW YORK AND TOWN OF SOUTHAMPTON

Pursuant to 10 C.F.R. §§ 2.740, 2.740b and 2.741, and in accordance with the Licensing Board's Orders of January 14, 1987 <sup>1/</sup>, February 4, 1987 <sup>2/</sup> and February 9, 1987, <sup>3/</sup> the NRC Staff hereby serves upon Suffolk County, the State of New York and the Town of Southampton ("Intervenors") the Staff's First Set of Interrogatories and Requests to Produce.

Each interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to the Intervenors, their officers, directors, members, employees, advisors, representatives or counsel, based upon the personal knowledge of the person answering. Intervenors are requested to produce each document identified in response to the subject

- 1/ "Order (Setting Discovery and Hearing Schedule)".
- 2/ "Order (Ruling on Motions for Reconsideration on Scheduling)".
- 3/ "Memorandum and Order (Ruling on LILCO's and Intervenors' Motion for Reconsideration of Schedule)".

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interrogatories. By such request for production of documents, the Staff seeks to inspect and copy pertinent documents which are in the possession, custody or control of Intervenors, their officers, directors, members, employees, advisors, representatives or counsel. As used herein, the term "documents" shall include any writings, drawings, graphs, charts, and schedules, however produced; photographs or other pictorial representations; recordings and tapes, whether sound or visual; and data compilations of whatever form.

In addition, Intervenors are requested, pursuant to 10 C.F.R. § 2.740(e), to supplement their responses as necessary with respect to the identity of each person expected to be called as an expert witness at the hearing in this proceeding, the subject matter on which he or she is expected to testify, and the substance of such testimony.

#### INTERROGATORIES AND DOCUMENT REQUESTS

Interrogatories 1 and 2 refer to the decision of the Appeal Board in ALAB-832, 23 NRC 135 (1986).

1. At 23 NRC 162, n.105, the Appeal Board refers to six witnesses <sup>4/</sup> and their testimony previously proposed by Intervenors, but which was rejected by the Licensing Board. Identify which of these witnesses are expected to testify during the reception center hearings, the subject matter on which he or she is expected to testify, and the substance of such testimony. For each witness so identified, specify

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<sup>4/</sup> Dr. James H. Johnson, Jr., Dr. Edward P. Radford, Richard Roberts, Charles E. Kilduff, Langdon Marsh and Sarah J. Meyland. See 23 NRC at 161, n.102.

exactly how their testimony will differ from the testimony previously submitted.

2. Identify any other person(s) whom Intervenors expect to call as a witness. Set out the subject areas of their testimony. State how this testimony relates to the five areas of inquiry referred to by the Appeal Board at 23 NRC 162, n. 105, or to any other matter in controversy in this proceeding. For each witness:

- a. State the substance of his or her testimony, including the facts and opinions to which the witness is expected to testify;
- b. Provide the basis for each such opinion;
- c. Identify and provide all documents, including studies and analyses, upon which the witnesses intend to rely;
- d. Identify all prior statements made by the witnesses in testimony or depositions, in this or other proceedings, which concern the subject matter of their testimony.

Interrogatories 3 and 4 relate to the decision of the Appeal Board in ALAB-855, 23 NRC \_\_\_ (1986), (Slip Opinion; December 12, 1986).

3. The Appeal Board has stated that ILLCO has the duty to estimate and plan for the number of evacuees desiring monitoring but not sheltering. Slip op. at 17-18.

a. What number of persons do Intervenors assert will desire monitoring but not sheltering? How many persons do Intervenors assert ILLCO must plan for in setting up monitoring facilities.

b. To the extent that Intervenors do not intend to provide testimony on this issue, state the basis for any general disagreement

Intervenors may have with the number of persons estimated by LILCO. Specifically, state whether Intervenors agree or disagree with the answers given by LILCO in its February 4, 1987 responses <sup>5/</sup> to Intervenors' Interrogatories 7 and 8. If Intervenors disagree, provide the basis for the disagreement and identify and provide all documents, studies and analyses relied upon, including any generated by Intervenors.

4. With respect to Interrogatory 3, identify the person(s) Intervenors expect to call as a witness on this issue, and provide the information for each such person in accordance with the format given in Interrogatory 2.

5. For each witness identified in response to Interrogatories 1, 2 and 4 provide a statement of the witness' educational and professional background, with specific reference to their qualifications to give their particular testimony.

6. In LILCO's February 4, 1987 responses (noted in Interrogatory 3), a copy of KLD Associates, Inc., Capacity Analysis <sup>6/</sup> was provided to Intervenors. With respect to the Capacity Analysis in particular, and to the traffic issue in general (as set forth by the Licensing Board in its December 11, 1986 Memorandum and Order (Rulings on LILCO Motion to Reopen Record and Remand of Coliseum Issue), Slip Op. at 18.), identify

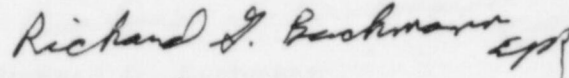
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<sup>5/</sup> "LILCO's Responses and Objections to Intervenors' First Set of Interrogatories and Request for Production of Documents Regarding Reception Center Issues Dated January 21, 1987".

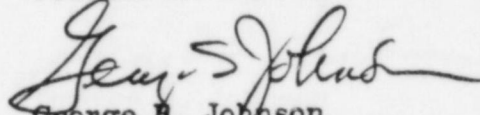
<sup>6/</sup> "Capacity Analysis of Highways in the Vicinity of Reception Centers for Evacuees from within the Shoreham Station Emergency Planning Zone" dated September 26, 1986.

expected Intervenors' witnesses and provide information in accordance with the format in Interrogatory 2, above.

Respectfully submitted,



Richard G. Bachmann  
Counsel for NRC Staff



George B. Johnson  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 19th day of February, 1987

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OF SUPPLEMENTARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
)  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322-OL-03  
) 50-322-OL-05  
(Shoreham Nuclear Power Station, )  
Unit 1) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF FIRST SET OF INTERROGATORIES AND REQUESTS TO PRODUCE OF SUFFOLK COUNTY, STATE OF NEW YORK AND TOWN OF SOUTHAMPTON" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 19th day of February, 1987.

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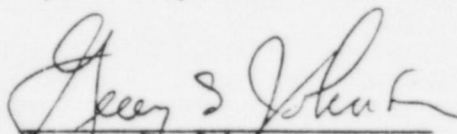
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