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LILCO, October 29, 1986

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

'86 NOV -3 P12:50

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))	

**LILCO'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO SUFFOLK COUNTY, NEW YORK STATE AND
TOWN OF SOUTHAMPTON**

Long Island Lighting Company, by its counsel, propounds the following interrogatories to Suffolk County, New York State and the Town of Southampton ("Intervenor" or "the Intervenors"), pursuant to §§ 2.740, 2.740b, and 2.741 of the Nuclear Regulatory Commission's Rules of Practice.

INSTRUCTIONS

A. Each interrogatory shall be answered separately and fully in writing under oath in accordance with § 2.740b of the NRC's Rules of Practice. To the extent that Intervenors do not have specific, complete and accurate information with which to answer any interrogatory, Intervenors should so state, and the interrogatory should be answered to the extent information is available, identifying each person whom is believed to have accurate information with respect thereto. Where exact information is not available, estimated information should be supplied; the answer should state that the information is an estimate and the basis on which the estimate was made. Where appropriate, the upper and lower boundaries of the estimate should be given.

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B. Each interrogatory shall be deemed to be continuing and Intervenors are requested seasonably to supplement answers with additional facts, documents, information and names of witnesses which become known, in accordance with § 2.740(e)(1) and (2) of the NRC's Rules of Practice.

C. "And" as well as "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

D. Wherever appropriate, the singular form of a word shall be interpreted in the plural and vice versa so as to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

E. Wherever appropriate, the masculine form of a word shall be interpreted as feminine and vice versa so as to bring within the scope of these discovery requests any information which might otherwise be construed to be outside their scope.

F. Please produce each document in the form and condition in which it exists on the date of service of this request, including all comments, notes, remarks, or other material that may have been added to the document after its initial preparation.

G. If Intervenors object to or claim a privilege (attorney-client, work product, or other) with respect to any interrogatory or document request, in whole or in part, or seek to withhold documents or information because of the alleged proprietary nature of the data, please set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Licensing Board to determine the validity of the objection or claim of privilege. This description by Intervenors should include with respect to any document: (1) author, addressor, addressee, recipients of indicated and "blind" copies together with their job titles; (2) date of preparation; (3) subject matter; (4) purpose for which the document was prepared; (5) all persons to whom distributed, shown or explained; (6) present custodian; (7) all persons believed to have a copy of the document; and (8) the nature of the privilege or objection asserted.

H. For any document or part of a document which was at one time, but is no longer, in Intervenor's possession, custody or control, or which is no longer in existence, or which cannot be located or produced, identify the document, state where and how it passed out of existence or why it can no longer be located and the reasons therefor, and identify each person having knowledge concerning such disposition or loss and the contents of the document, and each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

I. When, in order to answer a question fully or accurately, it is necessary to distinguish between the responses of individual Intervenor or to identify individual Intervenor, such distinctions or identifications should be made in the answer.

DEFINITIONS

A. "Person" means any individual, corporation, partnership, unincorporated association, joint venture, government or agency thereof, or other legal entity or form of organization or association.

B. "Document" means the original and each copy, regardless of origin or location, of any written, typed, printed, recorded or graphic material, however produced or reproduced, or any tangible thing that in whole or in part illustrates or conveys information, including but not limited to papers, letters, notes, books, correspondence, memoranda, interoffice or intraoffice communications, corporate records, memoranda or minutes of meeting or conversations whether personal or telephonic, cablegrams, mailgrams, telegrams, reports, summaries, surveys, analyses, studies, calculations, projections, ledgers, journals and other formal or informal books of record or account, bulletins, notices, announcements, advertisements, catalogs, manuals, instructions, agreements, contracts and other legal documents, notebooks, clippings, vouchers, checks and drafts, bills, receipts, invoices, calendars, appointment books, diaries, preliminary drafts and working papers, drawings, sketches, graphs, charts, plans, specifications,

blueprints, photographs, films, videotapes, tapes, recordings, computer-stored and computer-retrievable information, annotations or markings appearing on any document or thing, and all other writings and recordings of every description, however denominated, translated or described.

C. "Communication" includes every exchange of information by any means including but not limited to personal or telephonic.

D. "LILCO" or "LILCO personnel" means Long Island Lighting Company, and any affiliate, agent, employee, consultant, contractor, technical advisor, representative, or other person acting for on behalf of LILCO, or at LILCO's direction or control, or in concert with LILCO or assisting LILCO.

E. "Shoreham" means the Shoreham Nuclear Power Station Unit 1, any part thereof, or any structure, system, component, instrumentation, equipment or materials included in, or intended to be included in, Shoreham.

F. "Intervenors" means Suffolk County New York State and the Town of Southampton, or any of them, or any agency thereof and any agent, employee, consultant, contractor, technical advisor, representative or other person acting for or on behalf of them, or at their direction and control, or in concert with or assisting them.

G. "Contractor" means any person, not affiliated with Intervenors, who performed work concerning Shoreham on behalf of Intervenors and/or pursuant to a contract with Intervenors or sub-contractors who performed work on behalf of a contractor with whom the person was not affiliated and pursuant to a contract with such contractor. A person other than a contractor, who contracts with the sub-contractor, shall be deemed a sub-contractor.

H. "Concerns," "concerning," or any other derivative thereof, includes referring to, responding to, relating to, pertaining to, in connection with, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

I. "Identify" when used in reference to a natural person means to set forth the following:

1. his name;
2. his last known residential address;
3. his last known business address;
4. his last employer;
5. his title or position;
6. his area of responsibility;
7. his business, professional, or other relationship with Intervenors; and
8. if any of the above information is changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time period referenced in the interrogatory.

J. "Identify" when used in reference to a corporation or other entity that is not a natural person shall mean to set forth the following:

1. the full name of such person, including its legal name and any assumed or trade names under which it transacts or has transacted business;
2. the nature or form of such a person, if known;
3. the address of its principal place of business or the principal place where such person is to be found;
4. whether Intervenors have or have had any relationship or affiliation with such person, its affiliates or subsidiaries, and, if so, a description of such relationship; and
5. if any of the above information has changed subsequent to the time period referenced in a particular interrogatory, set forth in the answer, and label appropriately, current information as well as the information applicable to the time referenced in the interrogatory.

K. "Identify" when used in reference to a document shall mean to set forth the following:

1. its title;
2. its subject matter;
3. its date;
4. its author;
5. its addressee;
6. its file designation or other identifying designation; and
7. its present location and present custodian.

L. "Identify" with respect to a contact or communication shall mean to set forth the following:

1. the date of the communication;
2. the place of the making and place of receipt of the communication;
3. the type and means of communication;
4. the substance of the communication;
5. each person making a communication, and his location at the time the communication was made;
6. each person to whom the communication was made, and his location at the time the communication was made;
7. all other persons present during, participating in or, receiving the communication and the location of each such person at the time;
8. each document concerning such communication; and
9. each document upon which the communication is based or which is referred to in the communication.

M. "Analysis" means research, investigation, audit, inspection, review, evaluation, testing, monitoring, or any other method or form of examining data and/or forming conclusions or recommendations.

N. "NRC" or "NRC Staff" means the Nuclear Regulatory Commission and its staff, any division or section or region thereof, any staff member thereof, or any agent, consultant, contractor, technical advisor, employee, or representative of the NRC.

O. "FEMA" means the Federal Emergency Management Agency and its staff, any division or section or region thereof, any staff member thereof, or any agent, consultant, contractor, technical advisor, employee, or representative of FEMA.

P. "Exercise" means the exercise of the LILCO Offsite Emergency Plan for Shoreham conducted by FEMA on February 13, 1986 and activities occurring that day in connection therewith.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

1. General Matter

- a. Please identify all Intervenor personnel who observed, either at a particular facility or in the field, the February 13 Exercise. With respect to each, describe his assigned duty, function, location and activities during the exercise. If the assigned duty, function, location and/or activities of the observer changed or varied during the course of the Exercise, please describe such changes and specify the time frame, by hours and minutes, to which each assigned duty, function, location and/or activity pertains.
- b. Please provide copies of all documents concerning the Exercise prepared by the persons identified in response to the previous interrogatory prior to, during, or after the Exercise.

2. Contention EX 15:

- a. Please identify each witness Intervenor expect to call on this contention. For each person, other than experts, whom Intervenor expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenor expect to call as an expert witness, state the

subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of emergency planning exercises for nuclear power plants, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
 - 1) the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant,
 - 2) the significance of any plan element listed in Contention EX 15, as admitted and modified by the Board, to the Shoreham Emergency Plan as a whole,
 - 3) the significance of any plan element listed in Contention EX 15, as admitted and modified by the Board, to the reasonable assurance finding required by 10 CFR § 50.47(a)(1),

- 4) how the Exercise of the Shoreham Plan compares with exercises conducted by FEMA at other nuclear power plants.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 15 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 15.
- i. Please identify any communication between Intervenors and:
- 1) WALK Radio,
 - 2) any of the Radio Stations identified in subpart D of Contention EX 16,
 - 3) the United States Coast Guard,
 - 4) officials of Central Suffolk Hospital, St. Charles Hospital, John T. Mather Hospital or the Suffolk Infirmary,
 - 5) representatives of any public, parochial or private school located in the Shoreham EPZ,
 - 6) any school bus driver, or any representative of groups of school bus drivers, who serve schools located within the Shoreham EPZ,
 - 7) representatives of the State of Connecticut,
 - 8) officials or personnel of any nursing or adult home located in the EPZ,
 - 9) any congregate care center listed in Appendix B to the Shoreham Plan, or
 - 10) representatives of Nassau County
- prior to, during, or after the Exercise of the Shoreham Emergency Plan concerning that entity's participation in the Exercise.

3. **Contention EX 16:**

- a. Please identify each witness Intervenor expect to call on this contention. For each person, other than experts, whom Intervenor expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenor expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning (1) the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant and (2) comparisons of FEMA-graded exercises of emergency plans for nuclear power plants.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of emergency planning exercises for nuclear power plants, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.

- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
- 1) the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant,
 - 2) the significance of any plan element listed in Contention EX 16, as admitted and modified by the Board, to the Shoreham Emergency Plan as a whole,
 - 3) the significance of any plan element listed in Contention EX 16, as admitted and modified by the Board, to the reasonable assurance finding required by 10 CFR § 50.47(a)(1),
 - 4) how the Exercise of the Shoreham Plan compares with exercises conducted by FEMA at other nuclear power plants.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 16 or identified in response to item g. of this interrogatory on which Intervenor's intend to rely in support of their position on Contention EX 16.
- i. Please identify any communications between Intervenor's and:
- 1) Marketing Evaluations, Inc,
 - 2) officials or personnel of any bus company listed in Contention EX 16K, or
 - 3) officials or personnel of any ambulance company listed in Contention EX 16L
- prior to, during, or after the Exercise of the Shoreham Emergency Plan concerning that entity's participation in the Exercise.

4. **Contention EX 19:**

NOTE: Paragraphs (a) through (g) need be answered only in the event that Intervenor has sought reconsideration or other interlocutory reversal or modification of the Board's October 3 disposition of Contention 19, admitting it solely for purposes of argument and not for testimony. Paragraphs (h) through (j) should be answered in any event.

- a. Please identify each witness Intervenor expects to call on this contention. For each person, other than experts, whom Intervenor expects to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenor expects to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the necessary elements for making a reasonable assurance finding under 10 CFR § 50.47(a)(2).
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of emergency planning

exercises for nuclear power plants, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.

- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
 - 1) the necessary elements for making a reasonable assurance finding under 10 CFR § 50.47(a)(2).
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please provide a copy of the document in which is contained the basis for the representation in the contention that "In fact, however, FEMA's former Region II Director, Frank Petrone, stated on February 15, 1986, that a 'no reasonable assurance' finding was necessary: 'Since this Plan cannot be implemented without state and local governmental participation, we [FEMA] cannot give reasonable assurance under NUREG 0654 that the public health and safety can be protected.'"
- i. Please state the exact basis, if there is one, in any FEMA or other document, for the statement in that contention that "The exercise results were so limited that FEMA was unable to make the required reasonable assurance finding."
- j. Please identify and provide a copy of any document not already referred to in Contention EX 19 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 19.

5. Contention EX 21:

- a. Please identify each witness Intervenor expect to call on this contention. For each person, other than experts, whom Intervenor expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenor expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning (1) the choice of sample groups for evaluative purposes in FEMA-graded exercises of emergency plans for nuclear power plants, (2) the choice of sample groups for evaluative purposes and (3) the use of samples to draw conclusions about a larger population group.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of (1) the choice of sample groups for evaluative purposes in FEMA-graded exercises of emergency plans for nuclear power plants, (2) the choice of sample groups for evaluative purposes and (3) the use of samples to draw conclusions about

larger population groups, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.

- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenor with respect to any of the following:
- 1) the choice of sample groups for evaluative purposes, especially FEMA-graded exercises of emergency plans for nuclear power plants,
 - 2) the use of samples to draw conclusions about a larger population group,
 - 3) the statement in Contention EX 21 that "the samples which FEMA reviewed were much too small to permit valid generalizations or to support FEMA's conclusions concerning these objectives,"
 - 4) how FEMA's sampling process during the February 13 Exercise compares with those used by FEMA during exercises at other nuclear power plants.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 21 or identified in response to item g. of this interrogatory on which Intervenor intend to rely in support of their position on Contention EX 21.

6. Contention EX 22:

- a. Please identify each witness Intervenor expect to call on this contention. For each person, other than experts, whom Intervenor expect to call, state the subject matter on which each such witness is expected to testify

and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning to (1) the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant, (2) reception centers for disaster sheltering and (3) the use of the Nassau Veterans Memorial Coliseum as a reception center for the Shoreham Emergency Plan.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant and the use of reception centers for disaster sheltering, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:

- 1) the necessary elements of a FEMA-graded exercise of an emergency plan for a nuclear power plant,
 - 2) the use of reception centers for disaster sheltering,
 - 3) the use of the Nassau Veterans Memorial Coliseum as a reception center for the Shoreham Emergency Plan.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 22 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 22.

7. **Contention EX 36:**

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the making of protective action recommendations as a result of a radiological accident.

- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of protective action recommendations for radiological emergencies which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:
 - 1) the making of protective action recommendations during a radiological accident, especially one involving conditions like those in the accident scenario used in the Exercise,
 - 2) the "appropriateness" of protective action recommendations actually made by LERO during the Exercise.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 36 or identified in response to item g. of this interrogatory on which intervenors intend to rely in support of their position on Contention EX 36.

8. Contention EX 38:

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify

and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the operation of an emergency news center during an emergency or news dissemination during a natural or man-made emergency.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of the operation of an emergency news center during an emergency or news dissemination during a natural or man-made emergency, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:

- 1) the operation of LERO's emergency news center during the Exercise, especially in regard to the appropriateness and timeliness of actions taken by LERO at the ENC,
 - 2) news dissemination during a natural or man-made emergency, and in particular, the timeliness and content of news releases issued to the media during the Exercise,
 - 3) the conducting of press briefings during a natural or man-made emergency, especially in regard to the timeliness and content of LERO press briefings during the Exercise,
 - 4) the required number and form of maps, displays, and other visual aids in a media briefing room during a radiological accident, especially as compared to the LERO maps, displays, etc., present in the briefing room during the Exercise.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 38 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 38.
9. Contention EX 39:
- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning rumor control during a natural or man-made emergency.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of rumor control during a natural or man-made emergency, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:
 - 1) rumor control during a natural or man-made emergency, especially in regard to the time within which rumors should be confirmed, denied, or corrected,
 - 2) rumor control during the February 13 Exercise, and in particular,
 - (a) the timeliness of LERO rumor responses, and
 - (b) the accuracy or "correctness" of LERO rumor responses at the time and under the conditions existing at each called-in rumor.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.

- h. Please identify and provide a copy of any document not already referred to in Contention EX 39 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 39.

10. Contention EX 40:

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning to (1) the mobilization of emergency workers and (2) the content of EBS messages.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of mobilization of emergency workers or the content of EBS messages, which have either been published

in the open literature or, if not published in the open literature, circulated within the professional community.

- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
- 1) the mobilization of emergency workers, especially traffic guides (from time to time of their initial call-out through their reporting to their posts) during the February 13 Exercise,
 - 2) the effect of the mobilization time of traffic guides during the Exercise on evacuation time estimates for the Shoreham EPZ,
 - 3) the content of EBS messages, especially those formulated during the February 13 Exercise,
 - 4) the effect of changes in dispatching instructions for traffic guides contained in Revision 7 to the Shoreham Plan.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 40 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 40.

11. **Contention EX 41:**

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the

subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning (1) the mobilization of emergency workers, (2) traffic accident rates, either nationally or specifically on Long Island and (3) the removal of impediments from roadways.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of mobilization of emergency workers, traffic accident rates or removal of impediments from roadways, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
 - 1) mobilization of emergency workers, especially the mobilization of LERO road crews during the February 13 Exercise,
 - 2) traffic accident rates,
 - 3) removal of impediments from roadways, especially LERO's response to the two hypothetical traffic impediments during the February 13 Exercise,

- 4) the conclusion in Contention EX 41 that "LILCO's proposal for the removal of impediments to evacuation is inherently unworkable,"
 - 5) the conclusions about the addition of a Traffic Engineer to the EOC contained in subpart E of Contention EX 41.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 41 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 41.

12. Contention EX 47:

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the monitoring and decontamination of individuals potentially exposed to radiation.

- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of the monitoring and decontamination of individuals potentially exposed to radiation, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:
 - 1) procedures concerning the registration, monitoring and decontamination of individuals potentially exposed to radiation, especially relating to the monitoring and decontamination of evacuees from special facilities (nursing homes, adult homes and hospitals), including those in wheelchairs or on stretchers,
 - 2) procedures concerning the registration, monitoring, and decontamination of evacuees from schools.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 47 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 47.

13. Contention EX 49:

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call as a

witness, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.

- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceeding in which each witness has testified on matters concerning the registration, monitoring and decontamination of individuals potentially exposed to radiation.
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subject of registration, monitoring and decontamination of individuals potentially exposed to radiation, which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents with respect to any of the following:
 - 1) registration, monitoring and decontamination of individuals potentially exposed to radiation as a result of an accident at Shoreham, including but not limited to:

- (a) the staffing required to perform these functions,
 - (b) the equipment required to perform these functions, and
 - (c) the time required to perform these functions.
- 2) the number of persons who would seek monitoring under the conditions imposed during the Exercise.
- g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.
- h. Please identify and provide a copy of any document not already referred to in Contention EX 49 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 49.

14. Contention EX 5:

- a. Please identify each witness Intervenors expect to call on this contention. For each person, other than experts, whom Intervenors expect to call, state the subject matter on which each such witness is expected to testify and the substance of the facts to which he is expected to testify. For each person whom Intervenors expect to call as an expert witness, state the subject matter on which each expert is expected to testify, the substance of the facts and opinions to which he is expected to testify and a summary of the grounds for each such opinion.
- b. With regard to each witness, please provide a copy of his most current curriculum vitae, resume or statement of professional qualifications.
- c. Please list any NRC, legislative, or other legal proceedings in which each witness has testified on matters concerning (1) the training of workers,

(2) the selection of sample groups for evaluative purposes, (3) the number of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained to perform their jobs, (4) the severity or gravity of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained, (5) the use of narrative evaluation procedures, (6) the use of numerical evaluation procedures, (7) the performance of trainees or employees under test conditions and (8) the performance of emergency workers during a FEMA-graded exercise.

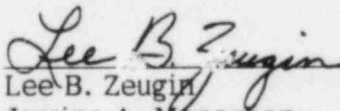
- d. Please provide copies of any prefiled testimony by each witness in the proceedings listed in response to item c.
- e. Please identify all articles, papers, or other documents authored or co-authored by each witness on the subjects of the training of workers, the selection of sample groups for evaluative purposes, the number of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained, the severity or gravity of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained the use of narrative evaluative procedures, the use of numerical evaluative procedures, the performance of trainees or employees under test conditions, the performance of workers during a FEMA-graded exercise which have either been published in the open literature or, if not published in the open literature, circulated within the professional community.
- f. Please state whether each witness has prepared, or has had prepared, any written studies, reports, analyses or other documents for Intervenors with respect to any of the following:

- 1) the training of workers,
- 2) the selection of sample groups for evaluative purposes,
- 3) the number of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained,
- 4) the severity or gravity of mistakes, errors or deficiencies needed to demonstrate that workers are inadequately trained,
- 5) the use of narrative evaluative procedures,
- 6) the use of numerical evaluative procedures,
- 7) the performance of trainees or employees under test conditions,
- 8) the performance of emergency workers during a FEMA-graded exercise.

g. Unless the answer to item f. is a simple negative, please identify and provide a copy of each document.

h. Please identify and provide a copy of any document not already referred to in Contention EX 50 or identified in response to item g. of this interrogatory on which Intervenors intend to rely in support of their position on Contention EX 50.

Respectfully submitted,



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Jessine A. Monaghan

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DATED: October 29, 1986

RELATED CORRESPONDENCE

DOCKETED
USNRC

CERTIFICATE OF SERVICE

'86 NOV -3 P12:50

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322-OL-5

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

I hereby certify that copies of LILCO's First Set of Interrogatories and Requests for Production of Documents to Suffolk County, New York State and Town of Southampton were served this date upon the following by hand as indicated by an asterisk, by Federal Express as indicated by two asterisks, or by first-class mail, postage prepaid.

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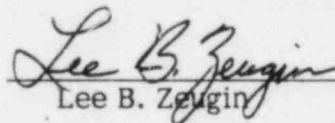
DATED: October 29, 1986

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