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RELATED CORRESPONDENCE

November 5, 1986 DOCKETED USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

SUFFOLK COUNTY, STATE OF NEW YORK, AND TOWN OF
SOUTHAMPTON'S FIRST REQUEST FOR ADMISSIONS
AND SECOND SET OF INTERROGATORIES DIRECTED TO LILCO

I. DEFINITIONS FOR USE IN ANSWERING REQUESTS FOR ADMISSIONS

A. As used herein:

1. The term "LILCO" or "LILCO personnel" means Long Island Lighting Company, any affiliate, agent, employee, consultant, contractor, technical advisor, representative (including, without limitation, attorneys and accountants and their respective agents and employees), or other person acting for or on behalf of LILCO, or at LILCO's direction or control, or in concert with LILCO or assisting LILCO.

2. The term "Exercise" refers to the exercise of the LILCO Offsite Emergency Plan for Shoreham conducted by FEMA on February 13, 1986, and includes activities at the LILCO EOF and the "Medical Drill" held on February 9, 1986.

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3. The term "LERO" means LILCO's Local Emergency Response Organization.

4. The term "Plan" or "LILCO Plan" means LILCO's "Local Offsite Radiological Emergency Plan" for Shoreham.

5. "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 (including but not limited to attorneys and accountants and their employees and agents) of FEMA.

II. REQUESTS FOR ADMISSIONS

Pursuant to 10 CFR 2.742, LILCO is requested to admit the following facts:

1. That the U.S. Coast Guard did not participate in the Exercise, except as the recipient of telephone calls from LERO.

2. That the State of Connecticut did not participate in the Exercise, except as the recipient of a telephone call from LERO.

3. That, during the Exercise, there was no demonstration of the resources or capability of the State of Connecticut to determine, issue, or implement ingestion pathway protective action recommendations in the event of a Shoreham emergency.

4. That Marketing Evaluations, Inc. did not participate in the Exercise.

5. That the Exercise was not a "full participation exercise" as defined in 10 CFR Part 50, Appendix E § IV.F.1.

6. That the LILCO siren system was not activated during the Exercise.

7. That early dismissal is one of the primary protective actions for school children under the LILCO Plan.

8. That WALK Radio, as of the time of the Exercise, was relied upon for notification to the public of a Shoreham emergency as well as for issuance to the public of protective action recommendations and other emergency information.

9. That certain actions by WALK Radio personnel, implementation of WALK Radio internal procedures and communications and interactions between WALK Radio personnel and LERO personnel are necessary to the operation of the LILCO EBS system as set forth in the LILCO Plan as exercised (Revision 6).

10. That WALK Radio did not participate in the Exercise.

11. That none of the other radio stations comprising LILCO's Emergency Broadcast System ("EBS") network (stations WBLI, WCTO, WGLI, WGSM, WLIM, WLIX, WLNG, WRCN, WRHD and WRIV) participated in the Exercise.

12. That a Superintendent and Principal from the Shoreham-Wading River School District were the only school officials and/or school personnel, including teachers, who participated in the Exercise.

13. That, during the Exercise, LERO personnel actually contacted (by telephone or otherwise) officials from only one school district -- the Shoreham-Wading River School District.

14. That under the LILCO Plan school bus drivers are relied upon for implementation of early dismissal and evacuation of school children.

15. That the only school bus drivers who participated in the Exercise were from the Shoreham-Wading River School District.

16. That the two facilities involved in the Exercise as congregate care facilities are not among the facilities identified in Revision 6 of the LILCO Plan as congregate care centers.

17. That procedures relating to recovery and re-entry and activities to implement recovery and re-entry were not included in the Exercise.

18. That, during the Exercise, U.S. Coast Guard personnel did not perform any public notification, protective action communication, waterborne traffic control, or access control functions on the water portion of the Shoreham EPZ.

19. That, during the Exercise, U.S. Coast Guard personnel did not simulate or pretend to perform any public notification, protective action communication, waterborne traffic control, or access control functions on the water portion of the EPZ.

20. That, during the Exercise, FEMA did not observe any personnel perform or take any actions on beaches, in parks, or on the water portion of the Shoreham EPZ.

21. That no officials or other personnel from the St. Charles Hospital participated in the Exercise.

22. That no officials or other personnel from the John T. Mather Hospital participated in the Exercise.

23. That no officials or other personnel from the Suffolk Infirmary participated in the Exercise.

24. That no officials or other personnel from the nine EPZ nursing/adult homes participated in the Exercise, except the Oak Hollow Nursing Center and Crest Hall Health Related Facility and the Riverhead Nursing Home and Health Related Facility.

25. That no hospitals, special facilities, adult or nursing homes actually participated in the Exercise or were consulted or contacted by LERO personnel during the Exercise.

26. That officials from hospitals, nursing homes, and similar facilities outside the EPZ, relied upon for relocation services and necessary health care for special facility evacuees, did not participate in the Exercise.

27. That 20 bus yards are relied upon to provide buses for use by LILCO according to the LILCO Plan.

28. That only nine bus yards participated in the Exercise.

29. That, with respect to the bus yards that participated in the Exercise, such participation consisted of receiving a telephone call requesting that four buses per yard be prepared for LERO's use.

30. That, during the Exercise, LERO personnel did not contact or communicate (by telephone or otherwise) with 12 of the 20 bus yards relied upon in the LILCO Plan.

31. That, during the Exercise, only nine buses were actually picked up and driven by LERO bus drivers.

32. That the LILCO Plan assumes that at least 193 ambulances and ambulettes will be made available to LERO in the event of an emergency at Shoreham.

33. That only six ambulances and six ambulettes actually participated in the Exercise.

34. That 11 ambulance companies are relied upon in the LILCO Plan.

35. That only two ambulance companies participated in the Exercise by providing manned vehicles.

36. That the date of the Exercise was known in advance of the Exercise by the LERO players.

37. That, during the Exercise, the Emergency News Center ("ENC") was not declared operational until 8:25 a.m.

38. That the first press briefing during the Exercise was held at 8:40 a.m.

39. That, during the Exercise, traffic guides were not notified of the simulated Shoreham emergency or required to report to the staging areas until after the declaration of the Site Area Emergency.

40. That, during the Exercise, only one tow truck was dispatched by LERO to the scene of the simulated gravel truck impediment.

41. That, during the Exercise, LERO personnel made no protective action recommendations for the ingestion pathway EPZ beyond the 10-mile zone.

42. That, during the Exercise, LERO personnel never recommended any protective measures for animals other than dairy animals.

43. That, during the Exercise, LERO personnel never made any protective action recommendations concerning drinking water, fruits, vegetables or other food chain items or animals, except for dairy animals in the 10-mile zone.

44. That, during the Exercise, LERO personnel never completed the "Ground Deposition Calculation Worksheet for Particulate Radionuclide Releases."

45. That, during the Exercise, only one shift of LERO workers was actually called out, either in whole or in part.

46. That, during the Exercise, persons identified as second or third shift personnel did not actually report for duty.

47. That, during the Exercise, the dispatch of route alert drivers to notify the ambulatory deaf was merely simulated.

48. That no school officials, personnel or children from the Ridge Elementary School participated in the Exercise.

49. That no school officials, personnel or children from the Longwood School District participated in the Exercise.

50. That as of 4:23 p.m., LERO personnel at the EOC had not confirmed with reception center personnel that the driver and bus purportedly "requested" by Ridge Elementary School during the Exercise had arrived at the Nassau Coliseum reception center.

51. That, under the LILCO Plan, 60 route alert drivers are expected to be available in the event of a Shoreham emergency.

52. That at least two hours elapsed during the Exercise before LERO's Transportation Support Coordinator was informed that a bus evacuation route was blocked by the gravel truck impediment.

53. That, during the Exercise, there was a delay of at least 45 minutes between LILCO's attempt to verify the fuel truck impediment and the dispatch of a route spotter from the Port Jefferson Staging Area.

54. That, during the Exercise, the operability of the tone alert radios relied upon by LILCO in its Plan was not demonstrated.

55. That the Exercise Scenario, and the access of LILCO players during the Exercise, were based on an assumption, stated in Revision 6 of the LILCO Plan, that the Nassau Veterans Memorial Coliseum is available for use by LILCO as a reception center for the registration and radiological monitoring and decontamination of evacuees and vehicles.

56. That, during the Exercise, there was no demonstration of the availability, location, accessibility or adequacy of reception centers for school children evacuated from schools in the EPZ.

57. That, during the Exercise, LERO News Release No. 1 was not provided to the press by the ENC until 8:21 a.m.

58. That, during the Exercise, an "Unusual Event" was declared by LILCO at 5:40 a.m.

59. That, during the Exercise, an "Alert" was declared by LILCO at 6:17 a.m.

60. That, during the Exercise, a "Site Area Emergency" was declared by LILCO at 8:19 a.m.

61. That, during the Exercise, a "General Emergency" was declared by LILCO at 9:39 a.m.

62. That, during the Exercise, the decision to evacuate the entire 10-mile EPZ was made by LERO at 11:46 a.m.

63. That, during the Exercise, the EBS message notifying the public of a Site Area Emergency and recommending that dairy animals be placed on stored feed was "issued" at 8:41 a.m.

64. That, during the Exercise, the EBS message notifying the public to evacuate the entire 10-mile EPZ was "issued" by LERO at 12:00 noon.

65. That, during the Exercise, EBS messages, the broadcast of which was simulated every 15 minutes between 12:06 and 3:48 p.m., recommended the evacuation of zones A-M, Q and R.

66. That, during the Exercise, the Emergency Operations Facility ("EOF") personnel projected that a wind shift would direct the plume away from zones A-M, Q and R as early as 3:00 p.m.

67. That there was a 2.5 hour delay by LERO during the Exercise in correcting an error in reporting extrapolated dose data as actual measurements at other distances.

68. That all evacuation recommendations made by LILCO personnel at the EOF during the Exercise were adopted by LERO personnel at the EOC.

69. That at approximately 2:40 p.m. during the Exercise, LERO players were informed by exercise controllers that there were still approximately 18 percent of the population, or about 20,550 people, who had not yet evacuated from the EPZ.

70. That, during the Exercise, the Emergency News Center ("ENC") was not declared operational by LERO personnel until 8:25 a.m.

71. That, during the Exercise, LERO held its first press briefing at 8:40 a.m.

72. That, as of 9:15 a.m. during the Exercise, LERO News Release No. 2 had not been distributed to the press.

73. That, during the Exercise, no mention was made by LERO to the media that a Site Area Emergency had been declared, that a minor release of radiation had occurred, or that dairy animals should be placed on stored feed until after 9:15 a.m.

74. That although the ENC received LERO Press Release No. 3 at 10:15 a.m., it was not posted at the ENC for the press until 11:10 a.m.

75. That, although LERO Press Release No. 4 was received by the ENC at 10:45 a.m., it was not posted at the ENC for the press until 11:56 a.m.

76. That, although LERO Press Release No. 5 was approved by the LERO Director at 11:02 a.m., it did not arrive at the ENC until 11:36 a.m., and was not made available to the press until after 11:36 a.m.

77. That, although LERO Press Release No. 6 was approved by the Director of LERO at 12:25 p.m., it was not posted at the ENC until 2:10 p.m.

78. That, although LERO News Release No. 7 was approved at 1:11 p.m., it was not posted at the ENC for the press until 3:07 p.m.

79. That, during the Exercise, the press was not informed by LERO, until 12:47 p.m., that an evacuation of the entire EPZ had been recommended.

80. That, although LERO workers were instructed to ingest KI (potassium iodide) tablets at 9:45 a.m. during the Exercise, LERO ENC personnel did not inform the media of this instruction until 1:05 p.m.

81. That when ENC personnel informed the media of the KI recommendation, LERO personnel requested the media not to print that information.

82. That, during the Exercise, although the EOC possessed information at 12:03 p.m. about the simulated Red Cross designation of congregate care facilities, the ENC did not obtain this information until 2:40 p.m.

83. That during press conferences during the Exercise, LERO personnel were unable to provide any information to the media concerning traffic conditions.

84. That during press conferences during the Exercise, LERO personnel were unable to provide any information to the media concerning conditions or activity on the water portion of the EPZ.

85. That during press conferences during the Exercise, LERO personnel were unable to provide any information to the media concerning protective actions for the correctional facility in the EPZ.

86. That during press conferences during the Exercise, LERO personnel were unable to respond to questions from the media about manpower at bridges and tunnels on evacuation routes.

87. That, the log kept by ENC personnel during the Exercise stated that, as of 12:01 p.m., the gravel truck impediment was being removed.

88. That as of 12:01 p.m. during the Exercise, no LERO equipment had yet arrived at the site of the gravel truck impediment.

89. That, at a press conference held during the Exercise at 11:38 a.m., LERO personnel announced that the population of the EPZ is higher in the winter than it is in the summer.

90. That at a press conference being held during the Exercise at 1:48 p.m., LERO personnel at the ENC were not able to respond to media questions about the fuel truck impediment.

91. That, during the Exercise, LILCO Press Release No. 4 was received by the ENC at 8:45 a.m.

92. That, during the Exercise, LILCO Press Release No. 4 was not given to LERO Media Monitoring personnel until 9:31 a.m.

93. That, during the Exercise, LILCO Press Release No. 5 received by the ENC at 9:05 a.m.

94. That, during the Exercise, LILCO Press Release No. 5 was not given to LERO Media Monitoring personnel until 9:31 a.m.

95. That, during the Exercise, LILCO employees from several LILCO District Offices and Call Boards responded to simulated inquiries from the public, pursuant to the LILCO Plan at 3.8-5.

96. That, although a General Emergency had been declared during the Exercise at 9:39 a.m., the information available to LILCO Callboard operators until approximately 11:00 a.m. stated that only a Site Area Emergency existed.

97. That, even though during the Exercise the public was first "notified" at 10:24 a.m. that people in zones A-M, Q and R had been advised to evacuate, the LILCO Callboard operators were not notified of this advisory until 12:35 p.m.

98. That, although LERO during the Exercise first recommended evacuation of the entire EPZ at approximately 12:00 noon, the LILCO Callboard operators did not receive word of this recommendation until approximately 2:00 p.m.

99. That, although during the Exercise declaration of an "Unusual Event" was made at 5:40 a.m., LILCO Callboard operators did not receive word of the declaration of an Unusual Event until approximately 8:15 a.m.

100. That, although an Alert was declared during the Exercise at 6:17 a.m., LILCO Callboard operators did not receive word that an Alert had been declared until approximately 8:30 a.m.

101. That, although during the Exercise a simulated rumor message inquiring whether the appliances in the caller's home were radioactive was given to the Patchogue Callboard operator at 1:45 p.m., a response was not relayed to the "caller" until 2:24 p.m.

102. That, although during the Exercise a simulated rumor message inquiring what to do about a daughter not yet home from Shoreham-Wading River High School was given to the Patchogue Callboard operator at 10:00 a.m., a response was not relayed to the "caller" until 10:52 a.m.

103. That, although during the Exercise a simulated rumor message inquiring whether the caller, from Bellport, should evacuate was given to the Patchogue Callboard operator at 12:05 p.m., a response was not relayed to the caller until 1:00 p.m.

104. That, although during the Exercise a simulated rumor message inquiring about how extensive evacuation would be, and what to do about trucks going into the Shoreham area, was given to the Hicksville Callboard operator at 7:51 a.m., a response was not relayed to the caller until 8:20 a.m.

105. That, although during the Exercise a simulated rumor message inquiring whether the cooling towers on the Shoreham plant had blown up was given to the Riverhead Callboard operator at 1:30 p.m., a response was not relayed to the caller until 2:48 p.m.

106. That, although during the Exercise a simulated rumor message inquiring if lobsters caught off the Shoreham jetty that morning were safe to eat was received by the Riverhead District Office at 11:30 a.m., a response was not relayed to the originating party until 12:28 p.m.

107. That, although during the Exercise a simulated rumor message from a caller whose husband worked at the plant and was not home yet, inquiring whether he had been hurt, was given to the Brentwood Callboard operator at 12:43 p.m., a response was not relayed to the caller until 1:30 p.m.

108. That, although during the Exercise a simulated rumor message inquiring whether the plant had been taken over by Arab terrorists was received at 9:54 a.m., a response was not relayed to the caller until 10:37 a.m.

109. That, although during the Exercise a simulated rumor message inquiring what to do with a horse was given to the Port Jefferson Callboard operator at 10:14 a.m., a response was not relayed to the caller until 10:47 a.m.

110. That, although during the Exercise a simulated rumor message inquiring how to get off Shelter Island because the ferry had been cancelled was given to the Hamptons Callboard operator at 2:51 p.m., a response was not relayed to the caller until 3:24 p.m.

111. That, although during the Exercise a simulated rumor message from a caller who lived in Medford, but worked in Melville, inquiring what he should do was given to the Huntington Callboard operator at 2:32 p.m., a response was not relayed to the caller until 3:05 p.m.

112. That, although during the Exercise a simulated rumor message from a person inquiring if he could eat the food in his refrigerator was given to the Babylon Callboard operator at 11:59 a.m., a response was not relayed to the caller until 12:29 p.m.

113. That, although during the Exercise a simulated rumor message from a dairy farmer asking what he should do if he were asked to evacuate was received at 9:38 a.m., a response was not relayed to the caller until 10:12 a.m.

114. That, during the Exercise, in response to a simulated inquiry at 7:51 a.m. from a person who "has trucks going to Suffolk" as to how extensive evacuation would be, the Hicksville Callboard operator responded at 8:20 a.m. that the only protective action was the closing of schools, and that there had been no evacuation recommended.

115. That, during the Exercise, as of 8:20 a.m., LERO personnel had begun to "pre-stage" for an evacuation.

116. That, during the Exercise, in response to a simulated inquiry at 11:30 a.m. as to whether lobsters caught that morning off the Shoreham jetty were safe to eat or touch, the Riverhead Callboard operator responded at 12:28 p.m. that there was no reason to believe, and no data to indicate, that anything was wrong with the lobsters.

117. That, during the Exercise, in response to a rumor message from The New York Times simulated at 8:45 a.m., and inquiring "what's going on" at the Shoreham plant, the rumor control responder related only that at 5:40 a.m. an Unusual Event had been declared, and at 6:17 a.m. an Alert had been declared.

118. That, during the Exercise, in response to a rumor message simulated at 3:15 p.m. inquiring whether there had been a release of radiation, the rumor control responder provided data as of 1:00 p.m.

119. That, during the Exercise, in response to a rumor message simulated at 11:45 a.m. purportedly from Dan Rather, who wanted "to take a TV crew into the Shoreham plant" and inquired how to get there, the rumor control responder stated "We don't advise going to the plant. There is a Site Area Emergency. You will be in the way." The responder then gave directions to the plant.

120. That, during the Exercise, a rumor message was simulated at 1:15 p.m. from a caller in Wading River who reported that people on his street were evacuating, that he could not walk, and did not know what to do. The response to this call was a recording that the office had been "closed due to conditions at the Shoreham plant," and giving the telephone numbers for electrical emergencies.

121. That, although an EBS message recommending evacuation of the entire EPZ was "aired" at 12:06 p.m. during the Exercise, at 1:19 p.m. a rumor control operator nevertheless advised a caller that evacuation had been recommended only for zones A-M, Q and R.

122. That, during the Exercise, beginning with the EBS message purportedly broadcast at 10:24 a.m., every LERO EBS message stated that LERO traffic guides were in place along evacuation routes to guide evacuees.

123. That, by 9:00 a.m. on the day of the Exercise, two traffic guides had reported to the Riverhead Staging Area.

124. That, by 9:00 a.m. on the day of the Exercise, one traffic guide had reported to the Port Jefferson Staging area.

125. That, by 9:00 a.m. on the day of the Exercise, one traffic guide had reported to the Patchogue Staging Area.

126. That, by 9:40 a.m. on the day of the Exercise, 19 traffic guides had reported to the Riverhead Staging Area.

127. That, by 9:40 a.m. on the day of the Exercise, 10 traffic guides had reported to the Port Jefferson Staging Area.

128. That, by 9:40 a.m. on the day of the Exercise, 37 traffic guides had reported to the Patchogue Staging Area.

129. That, during the Exercise, LERO Traffic Guides, other than Lead Traffic Guides, were not notified of the emergency or required to report to staging areas until after 8:19 a.m. when a Site Area Emergency was declared.

130. That, during the Exercise, no traffic guides were dispatched from their respective staging areas until after the evacuation recommendation had been made to the public by simulated EBS message.

131. That, during the Exercise, traffic guides were dispatched from the Port Jefferson Staging Area beginning at 10:30 a.m.

132. That, during the Exercise, the dispatching of traffic guides from the Port Jefferson Staging Area was not completed until 12:20 p.m.

133. That, during the Exercise, the dispatching of traffic guides from the Port Jefferson Staging Area was not completed until 12:49 p.m.

134. That, during the Exercise, traffic guides were dispatched from the Patchogue Staging Area beginning at 10:30 a.m.

135. That, during the Exercise, the dispatching of traffic guides from the Patchogue Staging Area was completed at approximately 10:59 a.m.

136. That, during the Exercise, the dispatching of traffic guides from the Riverhead Staging Area first began at 10:25 a.m. and was completed shortly after 11:00 a.m.

137. That, during the Exercise, the dispatching of additional traffic guides from the Riverhead Staging Area began at approximately 12:00 noon and was completed at approximately 12:20 p.m.

138. That, during the Exercise, traffic guides from the Patchogue Staging Area began arriving at their posts in the field at about 11:00 a.m.

139. That, during the Exercise, the last traffic guide reporting his arrival time at his field post to the Patchogue Staging Area reported his arrival at 11:40 a.m.

140. That, during the Exercise, traffic guides dispatched from the Port Jefferson Staging Area took up to 58 minutes to arrive at their posts in the field.

141. That, as of 12:50 p.m. during the Exercise, there were some traffic guides dispatched from Riverhead who still had not arrived at their posts in the field.

142. That, during the Exercise, the LERO road crews were not notified of the simulated Shoreham emergency or required to report to their respective staging areas until after the declaration of a Site Area Emergency at approximately 8:19.

143. That, as of 9:00 a.m. on the day of the Exercise, only one road crew member had reported to the Riverhead Staging Area.

144. That, as of 9:00 a.m. on the day of the Exercise, no road crew members had reported to the Port Jefferson Staging Area.

145. That, as of 9:00 a.m. on the day of the Exercise, no road crew members had reported to the Patchogue Staging Area.

146. That, as of 9:40 a.m. on the day of the Exercise, only two road crew members had reported to the Riverhead Staging Area.

147. That, as of 9:40 a.m. on the day of the Exercise, no road crew members had reported to the Port Jefferson Staging Area.

148. That, as of 9:40 a.m. on the day of the Exercise, only two road crew members had reported to the Patchogue Staging Area.

149. That, as of 10:20 a.m. on the day of the Exercise, only eight road crew members had reported to the Riverhead Staging Area.

150. That, as of 10:20 a.m. on the day of the Exercise, only seven road crew members had reported to the Port Jefferson Staging Area.

151. That, as of 10:20 a.m. on the day of the Exercise, only 10 road crew members had reported to the Port Jefferson Staging Area.

152. That, during the Exercise, the Evacuation Route Coordinator failed to advise the Evacuation Support Communicator for Route Spotters/Road Crews that the gravel truck impediment was a multiple vehicle accident.

153. That, during the Exercise, the Evacuation Route Coordinator failed to advise the Evacuation Support Communicator for Route Spotters/Road Crews that the fuel truck impediment involved the possibility of fire because fuel was leaking.

154. That, during the Exercise, the Evacuation Route Coordinator failed to advise the Evacuation Support Communicator for Route Spotters/Road Crews that both shoulders of the road were blocked by the fuel truck.

155. That, during the Exercise, the LERO Evacuation Coordinator was not informed of either the gravel truck or the fuel truck impediment until after about 12:13 p.m.

156. That FEMA personnel, not LERO personnel, first brought information regarding the traffic impediments to the Evacuation Coordinator's attention on the day of the Exercise.

157. That, during the Exercise, the LERO Road Logistics Coordinator had not been informed as of 1:48 p.m. that equipment needed to be sent to the site of the fuel truck impediment.

158. That, during the Exercise, only one tow truck was dispatched to the scene of the the gravel truck impediment.

159. That, during the Exercise, no scraper or other equipment besides the tow truck was sent to the site of the gravel truck impediment.

160. That, during the Exercise, the road crew assigned to the fuel truck impediment did not arrive at the scene of the simulated impediment until approximately 2:10 p.m.

161. That at least two hours elapsed during the Exercise before LERO's Transportation Support Coordinator was informed that a bus evacuation route was blocked by the gravel truck impediment.

162. That, during the Exercise, there was a delay of at least 45 minutes between LILCO's attempt to verify the fuel truck impediment and the dispatch of a route spotter from the Port Jefferson Staging Area.

163. That, during the Exercise, there was no simulated EBS broadcast or other public dissemination of information about the gravel truck or fuel truck traffic impediments until about 1:45 p.m.

164. That, during the Exercise, at 11:45 a.m., the LERO Route Spotter/Road Crew Communicator at the EOC requested the Port Jefferson Evacuation Support Coordinator to dispatch the route spotter on whose route the fuel truck impediment was located.

165. That the route spotter referenced in Request No. 164 above, was not dispatched until approximately 12:02 p.m.

166. That the assigned task of the newly proposed LERO "Traffic Engineer" at the EOC is to assist in evaluating road impediments and developing alternate routing.

167. That, during the Exercise, the free play message requesting that a bus be sent to the Ridge Elementary School was given to the LERO Evacuation Coordinator at the EOC at approximately 10:30 a.m.

168. That, during the Exercise, it took the Patchogue Staging Area 40 minutes to dispatch a bus driver after the request for a bus to evacuate children from the Ridge Elementary School had been received from the LERO EOC.

169. That, during the Exercise, the bus dispatched to Ridge Elementary School did not arrive at the school until approximately 1:23 p.m.

170. That, although LERO personnel were aware of the delay in the arrival of the bus dispatched to the Ridge Elementary School on the day of the Exercise, no actions were taken to check on the bus driver's whereabouts or to expedite his arrival at the school.

171. That, during the Exercise, LERO bus drivers were not dispatched to pick up their buses from bus company yards and, thereafter, to proceed to their assigned bus transfer points until over two hours after the declaration of a Site Area Emergency.

172. That, during the Exercise, LERO bus drivers were not dispatched to pick up their buses from bus company yards and, thereafter, to proceed to their assigned bus transfer points until over one hour after the declaration of a General Emergency.

173. That one bus driver dispatched from the Patchogue Staging Area and observed by FEMA during the Exercise took two hours and ten minutes to proceed from the staging area to his assigned transfer point.

174. That one bus driver dispatched from the Patchogue Staging Area and observed by FEMA during the Exercise proceeded to the wrong transfer point.

175. That one bus driver dispatched from the Patchogue Staging Area and observed by FEMA during the Exercise missed a segment of an assigned evacuation route.

176. That, during the Exercise, 70 minutes elapsed from the time that the LERO EOC informed the Patchogue Staging Area of a simulated siren failure until the simulated public alerting of that siren area was completed.

177. That traffic guides dispatched from the Riverhead Staging Area and observed by FEMA during the Exercise did not arrive at their respective Traffic Control Point assignments until between 11:50 a.m. and 12:10 p.m.

178. That at 9:19 a.m. on the day of the Exercise, the LERO Manager was told by simulators purportedly representing Suffolk County officials that no County resources would be available to assist LILCO during the Exercise.

179. That the LERO Traffic Coordinator was advised at 9:35 a.m. on the day of the Exercise that the SCPD had offered to provide LILCO whatever assistance was required.

180. That, at 10:02 a.m. on the day of the Exercise, the LERO Evacuation Coordinator notified the staging areas that the SCPD had offered assistance on traffic control, route alerting, and route spotting, and that police officers would be dispatched to the staging areas for briefings.

181. That, between 10:02 a.m. and 10:15 a.m. on the day of the Exercise, the LERO Traffic Control Coordinator informed (i) the Riverhead Staging Area to expect 39 SCPD officers to report for assignment to traffic control and route spotting functions; (ii) the Port Jefferson Staging Area to expect 74 SCPD officers and; (iii) the Patchogue Staging Area to expect 37 SCPD officers.

182. That the information referenced in Request No. 181, above, was not corrected until 10:50 a.m.

183. That, the participation of the American Red Cross in the Exercise was to have 1 individual at the EOC, 6 individuals at the Reception Center, and 3 individuals at each of the two Congregate Care Centers.

184. That, during the Exercise, the Transfer Point Coordinator at the Brookhaven National Laboratory Transfer Point, prior to 4:00 p.m., directed a bus driver to the EWDF, despite the fact that a message from the bus dispatcher to all transfer point coordinators had directed that all drivers arriving at transfer points before 4:00 p.m. were to be directed to the Nassau Coliseum.

185. That, during the Exercise, LILCO assumed that there would be no evacuation prior to 10:24 a.m.

186. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that only those persons advised to evacuate by the LERO players would seek to evacuate.

187. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that no members of the public would begin to evacuate until after 10:24 a.m. when the first EBS evacuation advisory was "issued."

188. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that there was no evacuation or mobilization traffic, accidents, or impediments in the road on the roads prior to the first LERO evacuation advisory.

189. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that there were no evacuees needing bus or ambulance transportation other than those advised to evacuate by LERO.

190. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that no bus companies or ambulance companies would refuse or be unable to make vehicles immediately available to LERO upon request.

191. That, during the Exercise, and in their responses to the Exercise Scenario, LERO players assumed that there were no persons reporting to the Nassau Coliseum other than the approximately 10,000 advised to do so by LERO.

192. That, during the Exercise, there was no demonstration of the registration, monitoring or decontamination of evacuees from special facilities.

193. That, during the Exercise, the existence, availability, adequacy or location of relocation/reception centers equipped to accept all the evacuees from the special facilities in the EPZ following an accident at Shoreham were not demonstrated.

194. That, during the Exercise, LERO players responded to the accident postulated in the scenario by "advising" approximately 100,000 individuals to report to the Nassau Coliseum for radiological monitoring and possible decontamination.

195. That it took LERO personnel 4 to 5 minutes to perform radiological monitoring on some evacuees at the Nassau Coliseum reception center during the Exercise.

196. That, with the exception of the Shoreham Wading River School District, officials of the other EPZ school districts have stated that they do not have the resources and that they are not capable of safely or effectively implementing an early dismissal or evacuation of their students during a Shoreham accident.

197. That if there were an evacuation of the entire EPZ, there could be 1,600 residents of nursing and adult homes, health care and other special facilities with special needs requiring special reception centers.

198. That, during the Exercise, LILCO did not actually contact or communicate with INPO, other power plants, or other entities to obtain additional monitoring personnel.

199. That no non-LILCO monitoring/decontamination personnel participated in the Exercise.

200. That, during the Exercise, LERO did not notify or communicate emergency information to the Federal Aviation Administration.

201. That, during the Exercise, LERO did not simulate the notification of, or communication of emergency information to, the Long Island Railroad.

202. That, during the Exercise, downwind distances of sample readings by field monitors were incorrectly reported as 7000 meters instead of 700 meters for a thyroid dose.

203. That there was a 2.5 hour delay by LERO during the Exercise in correcting an error in reporting extrapolated dose data as actual measurements at other distances.

204. That all evacuation recommendations made by LILCO personnel at the EOF during the Exercise were adopted by LERO personnel at the EOC.

205. That, as of the time of the Exercise, school bus drivers had not been supplied with dosimetry equipment.

206. That, as of the time of the Exercise, school bus drivers had not been trained in potassium iodide policy or use.

207. That, as of the time of the Exercise, school bus drivers had not been trained in the use of dosimetry or radiological exposure control.

208. That, as of the time of the Exercise, not all ambulette drivers had been trained in who can authorize doses in excess of, and what to do in the event of, exposure beyond the general public PAGs.

209. That, during the Exercise, the LERO Director was not always available in the "command room" to take calls over the RECS telephone or the dedicated telephone.

210. That, during the Exercise, the secretary who took calls in the LERO Director's absence told callers the Director would call back rather than taking a message in writing to the Director immediately.

211. That, during the Exercise, there were no key event or evacuation status boards in the EOC command room.

212. That, during the Exercise, LERO players assumed that buses carrying evacuees out of the EPZ would report to, and discharge evacuees at, the Nassau Coliseum.

213. That under the LILCO Plan, LILCO is responsible for training and retraining LILCO and non-LILCO personnel in LERO.

214. That LERO training began in 1983.

215. That all LILCO members of LERO are required to participate in the LERO training program on an annual basis.

216. That the LILCO Plan assigns the responsibility for implementing early dismissals, sheltering, and evacuations of school children, to school officials.

217. That, during the Exercise, LILCO Traffic Guides did not perform any of the traffic guidance or control activities assigned to them in the LILCO Plan.

218. That, during the Exercise, only three Route Alert Drivers (one from each Staging Area) were dispatched by LERO to perform route alerting functions.

219. That according to the LILCO Plan as exercised (Revision 6), evacuation of the transit-dependent general population of the EPZ requires 333 LILCO bus drivers to retrieve 333 buses from bus companies.

220. That according to the LILCO Plan as exercised (Revision 6), evacuation of the transit-dependent general population of the EPZ requires LILCO bus drivers to make 377 bus trips over 43 routes in the EPZ, plus 97 trips to the Nassau Coliseum.

221. That according to the LILCO Plan as exercised (Revision 6), evacuation of the transit-dependent general population of the EPZ requires 108 bus drivers to make 169 bus trips from the two transfer points under the jurisdiction of the Port Jefferson Staging Area.

222. That according to the LILCO Plan as exercised (Revision 6), evacuation of the transit-dependent general population of the EPZ requires 100 bus drivers to make 139 bus trips from the five transfer points under the jurisdiction of the Riverhead Staging Area.

223. That according to the LILCO Plan as exercised (Revision 6), evacuation of the transit-dependent general population of the EPZ requires 125 bus drivers to make 166 bus trips from the four transfer points under the jurisdiction of the Patchogue Staging Area.

III. SUPPLEMENT TO REQUESTS FOR ADMISSIONS;
SECOND SET OF INTERROGATORIES

As to each request for admission numbered 1 through 223 above, or portion thereof, to which the answer is anything other than an unqualified affirmative admission, LILCO is requested pursuant to 10 CFR 2.740b, to state the following, within fourteen (14) days after service hereof, using the same instructions for answering interrogatories as are set forth on pages 1 through 9 of "Suffolk County's First Set of Interrogatories and Requests for Production of Documents to Long Island Lighting Company" dated October 10, 1986:

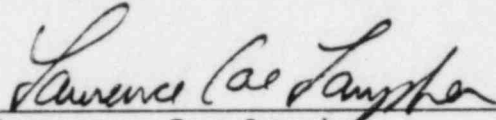
1. State the exact portion of each request which is not admitted;

2. With respect to each such unadmitted portion of each request for admission referred to in the answer to Interrogatory No. 1 above: (a) state the reason it is not admitted; and

(b) the names of any LILCO personnel who have information relating to, or knowledge of, the portion not admitted.

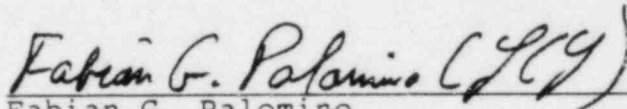
Respectfully submitted,

Martin Bradley Ashare
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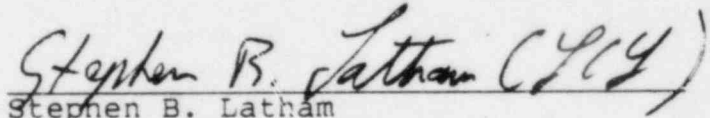
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Dated: November 5, 1986

DOCKETED
November 5, 1986

'86 NOV -7 P1:08

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
BOARDING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY, STATE OF NEW YORK, AND TOWN OF SOUTHAMPTON'S FIRST REQUEST FOR ADMISSIONS AND SECOND SET OF INTERROGATORIES DIRECTED TO LILCO have been served on the following this 5th day of November, 1986 by U.S. mail, first class, except as otherwise noted.

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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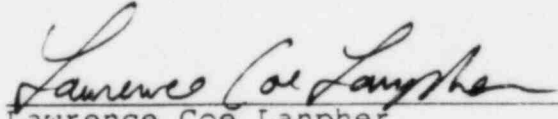
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* By Federal Express

Date: November 5, 1986


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