

LILCO, November 17, 1986

RELATED CORRESPONDENCEUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRC

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Before the Atomic Safety and Licensing BoardOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

tShoreham Nuclear Power Station,
Unit 1))) Docket No. 50-322-OL-5
) (EP Exercise)LILCO'S RESPONSE TO SUFFOLK COUNTY,
STATE OF NEW YORK AND THE TOWN OF
SOUTHAMPTON'S FIRST REQUEST FOR ADMISSIONS

Pursuant to 10 C.F.R. § 2.742(a), LILCO responds to the Intervencors' November 5 requests for admissions as follows:^{1/}

ANSWERS TO INTERROGATORIESSuffolk County Admission No. 1

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

Response: LILCO admits that the U.S. Coast Guard participated in the Exercise, and that the extent of that participation was the receipt of telephone calls from LERO, and denies any implication in the request that this participation was incomplete or insufficient.

Suffolk County Admission No. 2

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

Response: LILCO admits that the State of Connecticut participated in the Exercise as

^{1/} By responding to these requests, LILCO does not waive its argument that contentions challenging FEMA's scope and method of review of the Exercise should not be admitted for litigation in this proceeding.

the recipient of a telephone call from LERO, and denies any implication in the request that this participation was incomplete or insufficient.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 4

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

Response: Admitted.

Suffolk County Admission No. 5

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

Response: LILCO objects to request No. 5 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742 (a).

Suffolk County Admission No. 6

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

Response: Admitted.

Suffolk County Admission No. 7

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

Response: Denied. Early dismissal is not a "protective action"; sheltering and evacuation are protective actions under the LILCO Plan.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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).

Response: Admitted.

Suffolk County Admission No. 10

That WALK Radio did not participate in the Exercise.

Response: Denied. WALK Radio participated by attending press briefings at the ENC and by asking "in-scenario" questions at the ENC during the course of the Exercise.

Suffolk County Admission No. 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.

Response: Denied. Some of the radio stations listed participated by attending press briefings at the ENC and by asking "in-scenario" questions at the ENC during the course of the Exercise.

Suffolk County Admission No. 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.

Response: LILCO admits that the Superintendent from the Shoreham Wading River School District participated in the Exercise, denies that the Principal participated, and denies any implication in the request that this participation was incomplete or insufficient. In addition, the Director of Business Affairs for the Shoreham-Wading River School District participated in the Exercise.

Suffolk County Admission No. 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.

Response: LILCO admits that LERO personnel contacted one school district, Shoreham-Wading River, and denies any implication in the request that this participation was incomplete or insufficient.

Suffolk County Admission No. 14

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

Response: Denied. LILCO does not rely on school bus drivers for implementation of early dismissal and evacuation. The protection of school children is the responsibility of school officials.

Suffolk County Admission No. 15

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

Response: LILCO admits that only school bus drivers from the Shoreham-Wading River School District participated in the Exercise, and denies any implication in the request that this participation was incomplete or insufficient.

Suffolk County Admission No. 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.

Response: Denied. The congregate care centers identified in Revision 6 is not a static list; as indicated in the cover letter to the list printed in Revision 6, Appendix B, it is constantly updated by the Red Cross. Revision 6 of the LILCO Plan contemplates that congregate care facilities not necessarily on the list in Appendix B will be used under the Plan. The Red Cross had current agreements with the two facilities used during the Exercise.

Suffolk County Admission No. 17

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

Response: Denied. Recovery and reentry procedures were reviewed and implemented by players during the Exercise.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 21

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

Response: Admitted.

Suffolk County Admission No. 22

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

Response: Admitted.

Suffolk County Admission No. 23

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the Oak Hollow Nursing Center, Crest Hall Health Related Facility, and Riverhead Nursing Home and Health Related Facility participated in

the Exercise, and denies the remainder of the request to the extent that it implies that the participation by nursing and adult homes in the Exercise was incomplete or insufficient.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 24.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 27

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

Response: LILCO admits that 20 bus yards are relied upon to provide buses for use by LILCO according to Revision 6 of the LILCO Plan.

Suffolk County Admission No. 28

That only nine bus yards participated in the Exercise.

Response: LILCO admits that nine bus yards participated in the Exercise, and denies any implication in the request that the participation was incomplete or insufficient.

Suffolk County Admission No. 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.

Response: Denied. Some bus yards participating in the Exercise provided buses that were used during the Exercise.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 31

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

Response: Denied. Ten buses were picked up and driven by LERO bus drivers.

Suffolk County Admission No. 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.

Response: Denied. Revision 6 of the LILCO Plan assumes that 192 ambulances and ambulettes will be made available to LERO in the event of an emergency at Shoreham. OPIP 3.6.5, Att.6.

Suffolk County Admission No. 33

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

Response: LILCO admits that six ambulances and six ambulettes participated in the Exercise, and denies any implication in the request that this number was insufficient.

Suffolk County Admission No. 34

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

Response: Admitted.

Suffolk County Admission No. 35

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

Response: LILCO admits that two ambulance companies participated in the Exercise by providing manned vehicles, and denies any implication in the request that this number was insufficient.

Suffolk County Admission No. 36

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

Response: Admitted.

Suffolk County Admission No. 37

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

Response: LILCO admits that the ENC was declared operational at 8:25 a.m., and denies any implication in the request that this time was inadequate.

Suffolk County Admission No. 38

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted as to the LERO job classification of "traffic guides," and denied as to "lead traffic guides," who are notified and required to report to the staging areas after the declaration of an Alert.

Suffolk County Admission No. 40

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

Response: LILCO admits that one tow truck was dispatched by LERO to the scene of the simulated gravel truck impediment, and denies any implication in the request that this was an insufficient number.

Suffolk County Admission No. 41

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

Response: Admitted.

Suffolk County Admission No. 42

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

Response: LILCO admits that LERO personnel recommended, protective measures for dairy animals, and denies any implication in the request that the recommendation was inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that protective action recommendations were considered during the Exercise for drinking water, fruits, vegetables, and other food chain items or animals, and that protective action recommendations were made for dairy animals in the 10-mile zone and not for other items; and denies any implication in the request that those decisions were improper.

Suffolk County Admission No. 44

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

Response: Denied. Deposition calculations for field sample data were done and were contained in the Radiation Health Coordinator's log book.

Suffolk County Admission No. 45

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

Response: LILCO admits that only the first shift of LERO workers was actually called out during the Exercise, and that the first shift includes 150% of the field personnel needed to respond.

Suffolk County Admission No. 46

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

Response: Admitted.

Suffolk County Admission No. 47

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

Response: Denied. Route Alert Drivers were dispatched to the homes of deaf residents; however, they did not go so far as to knock on doors.

Suffolk County Admission No. 48

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

Response: Admitted.

Suffolk County Admission No. 49

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the arrival of the bus sent to Ridge Elementary School was not confirmed as of 4:23 p.m. and denies that the bus did not arrive at Nassau Coliseum. The bus arrived at 1:51 p.m.

Suffolk County Admission No. 51

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. The impediment was introduced at 10:39 a.m., and at 11:35 a.m. the Transportation Support Coordinator notified the Riverhead Bus Dispatcher about the gravel truck accident.

Suffolk County Admission No. 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.

Response: Denied. At 11:06 a.m. a message was sent from the EOC to the Port Jefferson Staging Area directing the dispatch of the route spotter. The dispatch forms show that the route spotter was dispatched at 11:40 a.m.

Suffolk County Admission No. 54

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the Nassau Veterans Memorial Coliseum was designated in Revision 6 of the LILCO Plan as the reception center and was the facility used in the Exercise as a reception center for the registration and radiological monitoring and decontamination of evacuees and vehicles. LILCO denies any implication in the request that the Exercise scenario assumption that the Nassau Coliseum was available as a reception center was a fundamental basis, linchpin, or critical element of the scenario.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 57

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

Response: LILCO admits that LERO News Release No. 1 was provided to the press by the ENC at 8:21 a.m., and denies any implication in the request that this was not timely.

Suffolk County Admission No. 58

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

Response: Admitted, with the understanding that "LILCO" means the onsite emergency response organization.

Suffolk County Admission No. 59

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

Response: Admitted, with the understanding that "LILCO" means the onsite emergency response organization.

Suffolk County Admission No. 60

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

Response: Admitted, with the understanding that "LILCO" means the onsite emergency response organization.

Suffolk County Admission No. 61

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

Response: Admitted, with the understanding that "LILCO" means the onsite emergency response organization.

Suffolk County Admission No. 62

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted, where "issued" means the completion of reading the EBS message.

The EBS message began at 8:38 a.m.

Suffolk County Admission No. 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.

Response: Admitted, where "issued" means the time when players began reading the EBS message.

Suffolk County Admission No. 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.

Response: LILCO admits that, during the Exercise, EBS messages broadcasted every fifteen minutes between 12:06 and 3:48 p.m. recommended that the entire EPZ evacuate, and denies the suggestion that only zones A-M, Q and R were evacuated.

Suffolk County Admission No. 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.

Response: Denied. At 3 p.m., the EOF was projecting a windshift at 4:30 that would project the plume over the eastern portion of zones A-M, Q and R.

Suffolk County Admission No. 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.

Response: Admitted, where "reporting" means posting on the board in the EOC.

Suffolk County Admission No. 68

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

Response: Denied. LERO did not adopt the initial shelter recommendation received from the EOF at 9:45 a.m.

Suffolk County Admission No. 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.

Response: LILCO is unable to admit or deny, from Exercise-generated papers, that players were informed at 2:40 p.m. by controllers that there were 20,550 people who had not yet evacuated. LILCO admits that at about 3:00 p.m. players were informed that approximately 18% of the population had not yet evacuated from the EPZ.

Suffolk County Admission No. 70

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

Response: Denied. LERO does not declare the ENC operational; it is declared operational by the onsite organization. LERO was ready to begin at the ENC at 8:08. See the response to No. 37.

Suffolk County Admission No. 71

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

Response: Admitted. See the response to No. 38.

Suffolk County Admission No. 72

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the ENC received LERO Press Release No. 3 at 10:15 a.m. and that it was posted at the ENC at 11:10 a.m., and denies any implication in the request that these times were inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that the ENC received LERO Press Release No. 4 at 10:45 a.m. and that it was posted at the ENC at 11:56 a.m., and denies any implication in the request that these times were inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that LERO Press Release No. 5 was approved by the LERO Director at 11:02 a.m., that it arrived at the ENC at 11:36 a.m., and that it was made available to the press thereafter, and denies any implication in the request that these times were inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that the LERO Press Release No. 6 was approved by the Director of LERO at 12:25 p.m., and was posted at the ENC at 2:10 p.m., and denies that any implication in the request that these times were inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that LERO Press Release No. 7 was approved at 1:11 p.m. and was posted at the ENC for the press at 3:07 p.m., and denies any implication in the request that these times were inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that the press was informed at 12:47 p.m. that an evacuation of the entire EPZ had been recommended, and denies any implication in the request that this was inadequate or insufficient.

Suffolk County Admission No. 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.

Response: LILCO admits that LERO workers were instructed to ingest KI at 9:45 a.m. and denies that LERO ENC personnel informed the media of this instruction at 1:05 p.m., and further denies any implication in the request that this was inadequate or insufficient. LERO ENC personnel did not receive any inquiries from the media about LERO workers taking KI.

Suffolk County Admission No. 81

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

Response: Denied. See the response to No. 80.

Suffolk County Admission No. 82

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

Response: LILCO admits that the EOC obtained information at 12:03 p.m. about the Red Cross congregate care facilities and that this information was given to the ENC at 2:40 p.m. and denies any implication in the request that this was inadequate or insufficient.

Suffolk County Admission No. 83

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

Response: Denied. Traffic information was provided at the ENC.

Suffolk County Admission No. 84

That during press conference 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.

Response: Denied. No information was requested by the press concerning the water portion of the EPZ.

Suffolk County Admission No. 85

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

Response: Denied. Information on correctional facilities was provided at the ENC.

Suffolk County Admission No. 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.

Response: LILCO objects to this request as irrelevant to any admitted contention.

Suffolk County Admission No. 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.

Response: Denied. The logs of the ENC support staff contain an entry showing the gravel truck was being removed as of 12:11 p.m.

Suffolk County Admission No. 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.

Response: LILCO admits that at 12:01 p.m. the LERO equipment had not yet met up with the FEMA observer at the site of the simulated gravel truck impediment.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. Information about the fuel truck was provided at the ENC.

Suffolk County Admission No. 91

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

Response: Admitted.

Suffolk County Admission No. 92

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

Response: Denied. There are no media monitoring personnel in LERO.

Suffolk County Admission No. 93

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

Response: Admitted.

Suffolk County Admission No. 94

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

Response: Denied. There are no media monitoring personnel in LERO.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 1:45 p.m. and a response relayed at 2:24 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 10:00 a.m. and a response relayed at 10:52 a.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 12:05 p.m. and a response relayed at 1:00 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 7:51 a.m. and a response relayed at 8:20 a.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 1:30 p.m. and a response relayed at 2:48 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 11:30 a.m. and a response relayed at 12:28 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 12:43 p.m. and a response relayed at 1:30 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 9:54 a.m. and a response relayed at 10:37 a.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 10:14 a.m. and a response relayed at 10:47 a.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 2:51 p.m. and a response relayed at 3:24 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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, a response was not relayed to the caller until 3:05 p.m.

Response: LILCO admits that the message described in request No. 101 was received at 2:32 p.m. and a response relayed at 3:05 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 11:59 a.m. and a response relayed at 12:29 p.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: LILCO admits that the message described in request No. 101 was received at 9:38 a.m. and a response relayed at 10:12 a.m., and denies any implication in the request that this response was untimely.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 115

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

Response: Denied. The prestaging message began around 9:44 a.m. for zones A-G, and prestaging began at 10:10 a.m.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that, during the Exercise, in response to a rumor message from The New York Times simulated at 8:45 a.m., inquiring "what's going on" at the Shoreham plant, the rumor control responder related that at 5:40 a.m. an Unusual event had been declared, and at 6:17 a.m. an Alert had been declared, and denies any implication in this request that that information was insufficient or incomplete.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. The message states only that traffic guides will be in place.

Suffolk County Admission No. 123

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

Response: Denied. Five traffic guides had reported to the Riverhead Staging Area by 9:00 a.m.

Suffolk County Admission No. 124

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

Response: Admitted.

Suffolk County Admission No. 125

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

Response: Admitted.

Suffolk County Admission No. 126

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

Response: Denied. By 9:40 a.m., 30 traffic guides had reported to the Riverhead Staging Area.

Suffolk County Admission No. 127

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

Response: Denied. By 9:40 a.m., 15 traffic guides had reported to the Port Jefferson Staging Area.

Suffolk County Admission No. 128

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

Response: Denied. By 9:40 a.m., 41 traffic guides had reported to the Patchogue Staging Area.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 131

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

Response: Denied. Traffic guides were dispatched from the Port Jefferson Staging Area beginning at 10:50 a.m., where "dispatched" means the time traffic guides were sent to pick up equipment and go to the field.

Suffolk County Admission No. 132

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

Response: LILCO admits that the last traffic guides were dispatched from the Port Jefferson Area at 12:20 p.m., and denies any implication in the request that this time was inadequate.

Suffolk County Admission No. 133

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

Response: Denied. The last traffic guides were dispatched from Port Jefferson at 12:20.

Suffolk County Admission No. 134

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

Response: Admitted.

Suffolk County Admission No. 135

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that one traffic guide from the Port Jefferson Staging Area took 58 minutes to arrive at his post.

Suffolk County Admission No. 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.

Response: LILCO lacks sufficient information to admit or deny this request.

Suffolk County Admission No. 142

That, as of 12:50 p.m. 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.

Response: LILCO admits that during the Exercise the LERO road crews were notified of the simulated Shoreham emergency and required to report to their respective staging areas after the declaration of a Site Area Emergency at approximately 8:19, and denies any implication in this request that that notification was inadequate.

Suffolk County Admission No. 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.

Response: LILCO admits that as of 9:00 a.m. on the day of the Exercise one road crew member had reported to the Riverhead Staging Area, and denies any implication in this request that that was inadequate.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. As of 9:40 a.m., five road crew members had reported to the Riverhead Staging Area.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. As of 9:40 a.m., four road crew members had reported to the Patchogue Staging Area.

Suffolk County Admission No. 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.

Response: Denied. As of 10:20 a.m., 13 road crew members had reported to the Riverhead Staging Area.

Suffolk County Admission No. 150

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

Response: Denied. As of 10:20 a.m., nine road crew members had reported to the Port Jefferson Staging Area.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 150.

Suffolk County Admission No. 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.

Response: LILCO admits that the Evacuation Route Coordinator did not advise the Evacuation Support Communicator for Route Spotters/Road Crews that the gravel truck impediment was a multiple vehicle accident, and denies the implication in this request that that action constituted a "failure."

Suffolk County Admission No. 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.

Response: LILCO admits that during the Exercise the Evacuation Route Coordinator did not advise the Evacuation Support Communicator for Route Spotters/Road Crews that the fuel truck impediment involved the possibility of fire, denies that the possibility of leaking fuel was not communicated, and denies the implication in this request that that action constituted a "failure".

Suffolk County Admission No. 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.

Response: LILCO admits that during the Exercise the Evacuation Route Coordinator did not advise the Evacuation Support Communicator for Route Spotters/Road Crews that both shoulders of the road were blocked by the fuel truck, and denies the implication in this request that that action constituted a "failure".

Suffolk County Admission No. 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.

Response: LILCO admits that during the Exercise the LERO Evacuation Coordinator was informed of the gravel truck or the fuel truck impediment after about 12:13 p.m., and denies any implication in the request that this response was inadequate.

Suffolk County Admission No. 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.

Response: Denied. A LILCO controller, at the request of FEMA personnel, first brought the information to the Evacuation Coordinator's attention.

Suffolk County Admission No. 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.

Response: Denied. The Road Logistics Coordinator knew about the impediment at 12:13 p.m.; a decision to dispatch equipment was made at 1:48 p.m.

Suffolk County Admission No. 158

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

Response: LILCO admits that during the Exercise one tow truck was dispatched to the scene of the gravel truck impediment, and denies any implication in the request that that was inadequate.

Suffolk County Admission No. 159

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

Response: LILCO admits that during the Exercise the tow truck was the only equipment sent to the site of the gravel truck impediment, and denies any implication in this request that that response was inadequate or insufficient.

Suffolk County Admission No. 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.

Response: Denied. The road crew arrived at the fuel truck impediment at 1:57 p.m.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 52.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 53.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. The dispatch message was received prior to 11:15 a.m.

Suffolk County Admission No. 165

That the route spotter referenced in Request No. 164 above, was not dispatched until approximately 12:01 p.m.

Response: Denied. The route spotter was dispatched at 11:40 a.m.

Suffolk County Admission No. 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.

Response: LILCO admits that such assistance is one of the Traffic Engineer's assigned functions.

Suffolk County Admission No. 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.

Response: LILCO admits that the free play message requesting that a bus be sent to the Ridge Elementary School was given to the LERO Public Schools Coordinator at the EOC at approximately 10:30 a.m., and denies that it was given to the LERO Evacuation Coordinator.

Suffolk County Admission No. 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.

Response: Denied. The elapsed time was 34 minutes.

Suffolk County Admission No. 169

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

Response: Denied. The bus arrived at 12:12.

Suffolk County Admission No. 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.

Response: Denied. The bus was not delayed.

Suffolk County Admission No. 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.

Response: LILCO objects to request No. 171 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742(a).

Suffolk County Admission No. 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.

Response: LILCO objects to request No. 172 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742(a).

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 174

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Denied. Traffic control points were manned beginning at 11:20 a.m.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 179

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted, except that the information was provided at 9:50 a.m.

Suffolk County Admission No. 182

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

Response: Denied. The simulators corrected the information between 10:26 a.m. and 10:50 a.m.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 185

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

Response: Denied. LILCO made no assumptions, but rather implemented the plan and procedures in response to the data provided by the Exercise scenario.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 185. In addition, LILCO objects to the request insofar as it expresses an attempt to resurrect the issue of voluntary evacuation or implies that the Exercise scenario should have tested LERO's ability to respond to alleged voluntary evacuation.

Suffolk County Admission No. 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".

Response: Denied. See the response to No. 186.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 186.

Suffolk County Admission No. 189

That, during the Exercise, and in their response 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.

Response: Denied. See the response to No. 186.

Suffolk County Admission No. 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.

Response: Denied. See the response to No. 185.

Suffolk County Admission No. 191

That, during the Exercise, and in their response 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.

Response: Denied. Approximately 100,000 evacuees were advised to go to the Coliseum and appropriate steps were taken for their arrival.

Suffolk County Admission No. 192

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

Response: Admitted.

Suffolk County Admission No. 193

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

Response: Denied. FEMA observed an ambulance travel from a health care facility in Ridge to a relocation center in Stony Brook.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO objects to request No. 196 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742 (a) but rather requires a legal conclusion.

Suffolk County Admission No. 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.

Response: Denied. There are 1300 special facility residents identified in the Plan.

Suffolk County Admission No. 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.

Response: Denied. The Manager of Local Response actually spoke to INPO to arrange for additional monitoring personnel.

Suffolk County Admission No. 199

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

Response: Admitted.

Suffolk County Admission No. 200

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

Response: Admitted.

Suffolk County Admission No. 201

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

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted. See the response to No. 67.

Suffolk County Admission No. 204

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

Response: Denied. See the response to No. 68.

Suffolk County Admission No. 205

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

Response: LILCO objects to request No. 205 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742(a).

Suffolk County Admission No. 206

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

Response: LILCO objects to request No. 206 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742(a).

Suffolk County Admission No. 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.

Response: LILCO objects to request No. 207 because it does not call for the admission of the truth of any specified relevant matter of fact as required under 10 C.F.R. § 2.742(a).

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: LILCO admits that the LERO Director was not present in the "command room" to take calls over the RECs phone or the dedicated telephone during every minute of the Exercise, and denies any implication in this request that his availability was inadequate or insufficient.

Suffolk County Admission No. 210

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

Response: Admitted.

Suffolk County Admission No. 211

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

Response: Admitted.

Suffolk County Admission No. 212

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

Response: Admitted.

Suffolk County Admission No. 213

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

Response: LILCO admits that LILCO is responsible for training and retraining LILCO and some non-LILCO personnel in LERO as specified in the LILCO Plan.

Suffolk County Admission No. 214

That LERO training began in 1983.

Response: Admitted.

Suffolk County Admission No. 215

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

Response: Admitted.

Suffolk County Admission No. 216

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

Response: Denied. New York State regulations, not the LILCO Plan, assign those responsibilities to school officials.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 218

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

Response: LILCO admits that three Route Alert Drivers were dispatched by LERO to perform Route Alerting functions, and denies any implication in the request that this was an inadequate number.

Suffolk County Admission No. 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.

Response: LILCO admits that the LILCO Plan requires as many as 333 LERO bus drivers to retrieve 333 buses from bus companies.

Suffolk County Admission No. 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.

Response: Denied. Under the LILCO Plan, all general population buses travel to the Coliseum. Thus, as many as 333 trips may be made, not 97.

Suffolk County Admission No. 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.

Response: Admitted.

Suffolk County Admission No. 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.

Response: Admitted.

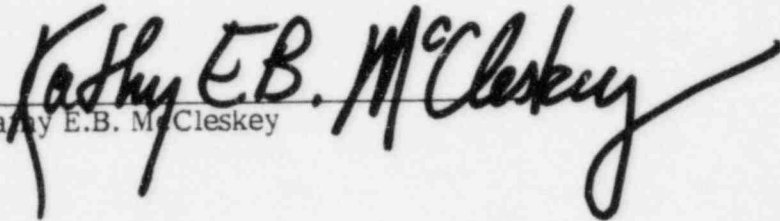
Suffolk County Admission No. 223

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.

Response Admitted.

Respectfully submitted,


Kathy E.B. McCleskey

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DATED: November 17, 1986

CERTIFICATE OF SERVICE

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

'86 NOV 20 A11:41

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DOCKETED
RECEIVED

I hereby certify that copies of LILCO's Submission of the "Revised Standard Version" of the Intervenor's Exercise Contentions, LILCO's Response to Suffolk County, State of New York, and the Town of Southampton's First Request for Admissions, and LILCO's Revised Standard Version of the Intervenor's August 1, 1986 Emergency Planning Contentions Relating to the February 13, 1986 Exercise were served this date upon the following by Federal Express as indicated by an asterisk, or by first-class mail, postage prepaid.

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DATED: November 17, 1986

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