

1301

LILCO, October 27, 1986

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'86 OCT 29 A10:53

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

**LILCO'S RESPONSES AND OBJECTIONS TO SUFFOLK COUNTY  
FIRST SET OF INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS DATED OCTOBER 10, 1986**

LILCO hereby responds to the Suffolk County Interrogatories and Request for Production of Documents dated and served on LILCO on October 10, 1986.

**I. GENERAL ANSWERS AND OBJECTIONS TO ALL INTERROGATORIES,  
DEFINITIONS AND INSTRUCTIONS**

A. All documents referenced in these answers which are not enclosed will be provided within the 30-day production period to the extent LILCO does not object to their production. In some instances, LILCO will make those documents available for inspection at LILCO's place of business within the 30-day production period.

B. LILCO objects to that portion of Suffolk County's definition V.(4) which seeks to include the "medical drill" held on February 9, 1986 in this litigation. The medical drill was an onsite function that is not the subject of any admitted contention. LILCO concurs in definition V.(4) to the extent it defines "Exercise" as the "exercise of the LILCO Offsite Emergency Plan." Therefore, all documents referenced or provided in the following Responses and Objections are those generated by offsite activities, with the exception of documents generated at the EOF, which have already been provided to Suffolk County.

8610300132 861027  
PDR ADOCK 05000322  
G PDR

D503

C. LILCO objects to Paragraph L of Suffolk County's Definitions and Instructions on the ground that disclosure of such information would constitute an invasion of privacy of those individuals, which may subject them to harassment and intimidation. As Suffolk County notes in footnote 1 to Interrogatory No. 6, LILCO has refused to identify LILCO employees by name throughout this proceeding, and LILCO adheres to that policy in these responses. Instead, LILCO will identify individuals by their LILCO employee numbers.

D. LILCO objects to the inclusion of attorneys in the definition of "LILCO" or "LILCO personnel" in paragraph H of Suffolk County's Definitions and Instructions because their inclusion is clearly calculated to discover information protected by the attorney-client privilege and the work product doctrine.

E. LILCO objects to all interrogatories, definitions and instructions insofar as they require the disclosure of any information subject to the attorney-client privilege or work product doctrine.

F. LILCO objects to all interrogatories insofar as they purport to require information outside the possession, custody or control of LILCO.

## II. ANSWERS AND OBJECTIONS TO INTERROGATORIES

### Suffolk County Interrogatory No. 1

Identify each person whom LILCO expects to call as an expert or non-expert witness during the emergency planning exercise hearings and state the subject matter on which each is expected to testify.

Response: Following is a list of witnesses, organized by the contention, whom LILCO currently expects to call during the exercise hearings.<sup>1/</sup> Should there be revisions to this list, LILCO will promptly notify Suffolk County.

---

<sup>1/</sup> In accordance with the Licensing Board's October 3 Prehearing Conference Order, LILCO will present legal argument only in response to Contention EX 19; therefore no witnesses have been identified for that contention.

For witnesses who are well known to Suffolk County only names are provided. For other witnesses, additional information as to the witness' place of business, the subject matter of the witness' testimony, or his area of expertise is provided.

Contention EX 15	John A. Weismantle Charles A. Daverio Dennis M. Behr, The Behr Consulting Group
Contention EX 16	Charles A. Daverio Dennis M. Behr, The Behr Consulting Group
Contention EX 21	Charles A. Daverio
Contention EX 22A	John A. Weismantle Elaine D. Robinson Richard J. Watts, Richard J. Watts, Inc.
Contention EX 36	John A. Weismantle Jay R. Kessler Richard J. Watts, Richard J. Watts, Inc.
Contention EX 38	John A. Weismantle Elaine D. Robinson Brian R. McCaffrey
Contention EX 39	Charles A. Daverio Elaine D. Robinson Brian R. McCaffrey
Contention EX 40	John A. Weismantle Edward B. Lieberman, KLD Associates
Contention EX 41	John A. Weismantle Walter F. Wilm, LILCO (Exercise Evacuation Coordinator) Edward B. Lieberman, KLD Associates
Contention EX 47	Charles A. Daverio Richard J. Watts, Richard J. Watts, Inc.
Contention EX 49	John A. Weismantle Elaine D. Robinson Richard J. Watts, Richard J. Watts, Inc.
Contention EX 50	John A. Weismantle Charles A. Daverio

**Suffolk County Interrogatory No. 2**

Provide an up-to-date resume of, and all studies, papers, articles, reports, books, and other such documents, published or unpublished, authored or prepared by each of the persons LILCO intends to call as a witness.

**Response:** Before the end of the 30-day production period, LILCO will provide up-to-date resumes for the witnesses identified in response to Suffolk County Interrogatory No. 1. To the extent the witness' work is relevant to emergency planning and not privileged, LILCO will provide copies of unpublished documents. LILCO will also provide a list of works published by each witness. However, LILCO objects to providing documents to which LILCO and Suffolk County have equal access in the public record.

**Suffolk County Interrogatory No. 3**

Identify by date, location and proceeding, all prior testimony before any judicial, administrative, or legislative body, including deposition testimony concerning emergency preparedness, including the implementability of emergency preparedness plans and tests or exercises thereof, given by each of the persons LILCO intends to call as a witness.

**Response:** The information requested will be provided with each witness' resume.

**Suffolk County Interrogatory No. 4**

Provide a copy of the Emergency News Center videotape recorded by LILCO during the Exercise.

**Response:** There are four LILCO videotapes from the day of the Exercise which record both press conferences held at the ENC during and after the Exercise and news clips filmed by local television stations. LILCO is willing to make arrangements to have these videotapes copied at Suffolk County's expense. Suffolk County need only notify LILCO that it wants the copies made.

**Suffolk County Interrogatory No. 5**

Provide copies of any other recordings, transcripts, minutes, summaries, or other documents concerning events which occurred during the Exercise.

**Response:** The majority of documents which are responsive to this request have already been provided to Suffolk County. Players' logs and message forms constitute the primary source of information concerning events which occurred during the

Exercise. Most of these logs and message forms were provided to Suffolk County along with other documents generated by off-site players in LILCO's informal production of documents on June 23, 1986. Additional player logs and message forms were provided by LILCO along with other EOF documents on July 18, 1986. Largely duplicative player logs and message forms were provided informally by FEMA on May 16, 1986.

Also responsive to this request are four cassette tape recordings of local radio station broadcasts from the day of the Exercise. LILCO will provide copies of these cassettes to Suffolk County.

The notes of LILCO controllers and observers also contain information about events that occurred during the Exercise. These documents are discussed in LILCO's responses to Suffolk County Interrogatories Nos. 8, 27 and 31 below.

Finally, summaries of various exercise events have been prepared by or at the request of LILCO counsel. These documents include event-specific timelines and summaries of interviews with various Exercise players. LILCO objects to the production of these documents on the grounds of attorney-client privilege and the work product doctrine.

**Suffolk County Interrogatory No. 6**

Provide the following information with respect to each LILCO-employed LERO worker who participated in the Exercise:

- a. Name;<sup>1</sup>
- b. Position with LILCO;
- c. Position with LERO; and
- d. Exercise location.

<sup>1</sup>Should LILCO wish to protect the privacy of individual workers, the County has no objection to LILCO's designating, at this time, the LERO workers by number (or some other means) rather than by name, as was done in the past.

**Response:** As noted in the general objections above, LILCO objects to Suffolk County Interrogatory No. 6(a) to the extent it seeks information the disclosure of which will invade the privacy of LERO workers, and could, if used improperly, subject them to

harassment and intimidation. As Suffolk County notes in its request, LILCO has never revealed the names of the LERO workers. In addition, LILCO objects to Interrogatory No. 6(b) on the grounds that it seeks information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

With regard to items 6(a), (c) and (d), LILCO has previously provided Suffolk County with rosters generated on the day of the Exercise at the Brentwood EOC, Nassau Coliseum, Patchogue Staging Area, Port Jefferson Staging Area and Riverhead Staging Area. There is no roster for the ENC since those LERO workers report first to the EOC. A sign-in list from the ENC was provided to Suffolk County with the rest of the offsite documents on June 23, 1986. A roster does not exist for the EWDF. LILCO is at present generating a computer list that will identify EWDF workers by LILCO employee number.

With these responses LILCO is providing a redacted copy of the roster from the Family Tracking Center. Finally, LILCO is also providing a redacted list of LERO participants, identified by position and organized by facility.

**Suffolk County Interrogatory No. 7**

Provide:

- a. Copies of any questionnaires, forms, surveys, correspondence or other documents seeking information from Exercise players concerning the Exercise, their participation in it, or in events concerning the Exercise which occurred prior to, during, or after the Exercise; and,
- b. All responses, or documents, or information received in response to the documents referenced in (a).

**Response:** LILCO objects to Interrogatory No. 7(a), and in particular the phrase "or in events concerning the Exercise," as vague and incomprehensible. Without waiving this objection, LILCO states that it is in the process of identifying documents which are responsive to this request. Without waiving objections which may be appropriate when the entire group of documents is assembled, LILCO can at present identify one document which is responsive to this request.

The document is a letter from Charles A. Daverio to all LERO workers requesting that they turn in any and all documents created during the Exercise. A copy of that document is enclosed with these responses. All documents which were returned in response to that letter were included in the collection of offsite documents which LILCO provided to Suffolk County on June 23, 1986.

**Suffolk County Interrogatory No. 8**

Provide:

- a. Copies of any questionnaires, forms, surveys, correspondence or other documents seeking information from LILCO controllers, evaluators, observers or other LILCO personnel or contractors concerning the Exercise, their participation in it, or in events concerning the Exercise which occurred prior to, during, or after the Exercise; and,
- b. All responses, or documents, or information received in response to the documents referenced in (a).

**Response:** LILCO is in the process of identifying documents which are responsive to this request. Without waiving appropriate objections to documents that are not identified in this answer, LILCO can identify one group of these documents: "observer forms."

On the day of the Exercise certain LILCO personnel were designated to observe and comment on events occurring during the exercise at several locations. Each observer filled out a standard form. LILCO will provide copies of these documents to Suffolk County, with names and phone numbers of LILCO personnel redacted, as soon as the redacting process is completed.

On the day of the Exercise various LILCO attorneys, who were classified as "observers," also used the standardized observer forms. LILCO objects to the production of these forms on the ground of the work product doctrine.

**Suffolk County Interrogatory No. 9**

Identify every company, organization, group, entity, institution, and individual, other than those identified in item 6, who participated in any way in the Exercise. With respect to each organization identified, identify the person or persons affiliated with that organization who are knowledgeable concerning that organization's participation in the Exercise. With respect to individuals identified, identify the organization or entity which they represent or of which they are members.

**Response:** LILCO objects to providing names of individuals employed by outside participating organizations for the reasons set out in its response to Suffolk County Interrogatory No. 6. However, LILCO is providing a list of organizations which participated on the day of the Exercise with these responses.

**Suffolk County Interrogatory No. 10**

Identify every company, organization, group, entity, institution, and individual, other than those identified in item 6, who participated in any way in activities concerning the Exercise prior to or after the Exercise. With respect to each organization identified, identify the person or persons affiliated with that organization who are knowledgeable concerning that organization's participation in the Exercise. With respect to individuals identified, identify the organization or entity which they represent or of which they are members.

**Response:** LILCO objects to this request as overly broad, unduly burdensome and not relevant in that the information it seeks is not reasonably calculated to lead to the discovery of admissible evidence. No admitted contention addresses either the pre- or post-Exercise performance of any organization named or unnamed. Therefore, the list of organizations sought by this request is not related to the subject matter of this litigation.

**Suffolk County Interrogatory No. 11**

Provide copies of all correspondence, questionnaires, or documents:

- a. sent by or on behalf of LILCO to the organizations or individuals identified in response to the previous two interrogatories; and,
- b. received from such organizations or individuals, concerning the Exercise.

**Response:** LILCO objects to this request to the extent that it seeks documents related

to organizations covered by Suffolk County Interrogatory No. 10, for the reasons stated in LILCO's objection to that request. Before the end of the 30-day period LILCO will provide the documents requested for the organizations identified in LILCO's response to Suffolk County Interrogatory No. 9.

**Suffolk County Interrogatory No. 12**

Did any non-LILCO organizations or personnel decline to participate in the Exercise? If so, please identify and, for individuals, specify the organizations which they represent or of which they are members, and identify the reason(s) given for their declining to participate.

**Response:** LILCO is aware of only one organization which declined to participate in the Exercise. On January 23, 1986, LILCO was informed orally by Richard Segerdahl, Superintendent of the Island Trees Union Free School District that, on advice of counsel, one school in that district would not participate as a congregate care center during the Exercise.

**Suffolk County Interrogatory No. 13**

Provide copies of all correspondence or documents:

- a. sent by or on behalf of LILCO to the organizations or persons identified in the previous Interrogatory; and,
- b. received from these organizations or persons, concerning such non-participation.

**Response:** There are no documents which are responsive to this request. See LILCO Response to Suffolk County Interrogatory No. 12.

**Suffolk County Interrogatory No. 14**

Provide copies of all correspondence to or from, and any other documents or information sent by or on behalf of LILCO to, or received from, FEMA and/or the NRC, or any other federal agency, federal personnel, or contractor thereof, concerning the Exercise.

**Response:** LILCO objects to Suffolk County Interrogatory No. 14 as overly broad, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving these objections, LILCO states that it is currently identifying documents which may be responsive to this request.

**Suffolk County Interrogatory No. 15**

Identify all persons who participated in the drafting, designing, preparing, reviewing, revising, negotiating, or finalizing of proposed or actual Exercise objectives.

**Response:** LILCO objects to Suffolk County Interrogatory No. 15 on the grounds that it seeks information that is not relevant, and is not reasonably calculated to lead to the discovery of admissible evidence. The only contentions to which this interrogatory is arguably relevant are Contentions EX 15 and 16. Those contentions allege that the exercise, as run, was so limited that it did not yield valid results for judging compliance with § 50.47(a)(2). Indeed, in admitting these contentions the Board expressly stated that "[t]he full participation exercise described in 10 CFR 50.47, App. E IV.F.1., . . . provides the standard against which the February 13, 1986 exercise is to be measured." Hence, the only facts relevant to Contentions EX 15 and 16 are what was tested on February 13, and whether that test complies with 10 CFR 50.47, App. E. Events which occurred prior to the February 13 exercise, including the preparation of the Exercise objectives and scenario, are irrelevant to deciding those issues.

**Suffolk County Interrogatory No. 16**

Provide copies of all documents, including correspondence and drafts, concerning proposed or actual Exercise objectives.

**Response:** LILCO objects to this request for the reasons stated in LILCO's response to Suffolk County Interrogatory No. 15. Further, LILCO objects to this interrogatory on the grounds that it may seek information which is protected by the attorney-client privilege.

**Suffolk County Interrogatory No. 17**

Identify all persons who participated in the drafting, designing, preparing, reviewing, revising, negotiating, or finalizing of proposed or actual Exercise scenarios.

**Response:** LILCO objects to this request for the reasons stated in LILCO's response to Suffolk County Interrogatory No. 15.

**Suffolk County Interrogatory No. 18**

Provide copies of all documents, including correspondence and drafts, concerning proposed or actual Exercise scenarios.

**Response:** LILCO objects to this request for the reasons stated in LILCO's response to Suffolk County Interrogatory No. 15. Further, LILCO objects to this interrogatory on the grounds that it may seek information which is protected by the attorney-client privilege.

Without waiving these general objections, LILCO notes that the exercise scenario that was used for the February 13 Exercise is responsive to this request. A copy of the scenario has already been provided to Suffolk County.

**Suffolk County Interrogatory No. 19**

Identify by date and description all drills, exercises, tabletop exercises, classroom training sessions, and all other LERO training activities that occurred during the calendar year preceding the Exercise.

**Suffolk County Interrogatory No. 20**

For each activity identified in response to the previous interrogatory, identify the persons who participated.

**Suffolk County Interrogatory No. 21**

For each activity identified in response to Interrogatory 19, provide all documents concerning the activity.

**Response:** LILCO objects to Suffolk County Interrogatories Nos. 19, 20 and 21 on the grounds that they seek information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence. LILCO also objects to these

interrogatories as unduly burdensome. Over 300 drills, exercises, tabletops and other training sessions are responsive to this request; the names of persons who attended these training activities total nearly 20,000; and upwards of 200,000 pages of documentation were generated by these training sessions. The documents sought by this series of interrogatories are similar in type to earlier training documents which served as the basis for litigation on the training aspects of the Shoreham Emergency Plan.

**Suffolk County Interrogatory No. 22**

Identify by date and description all drills, exercises, tabletop exercises, classroom training sessions, and all other LERO training activities that occurred subsequent to the Exercise.

**Response:** A copy of the training schedule for the requested time period is enclosed. The schedule sets out the date, time, location and a brief description of each training session and exercise.

In some cases, the only description provided is a number/letter code such as 2IJ. The numbers refer to the list of modules taught in that session. The content of each module is described in OPIP 5.1.1. The numbers preceding each number/letter code include the following modules: 1\* - modules 1, 2; 2\* modules 3, 5, 10; 3\* - modules 8, 9; 2 - modules 1, 2, 5, 8; 3 - modules 3, 9, 10; 4 - modules 4, 17, 19; 5 - modules 6, 18; 6 - modules 7, 16; 7 - modules 10a; 8 - modules 12; 9 - modules 13, 14, 15. The letter codes are individual identifiers which differentiate duplicate training sessions by the date on which they were taught.

**Suffolk County Interrogatory No. 23**

For each activity identified in response to the previous interrogatory, identify the persons who participated.

**Response:** LILCO objects to providing the identity of LERO workers on the ground of relevance, in that this information is not reasonably calculated to lead to the discovery

of admissible evidence. Consistent with the requirements of LILCO's Plan and Procedures, LERO workers have participated in the regularly scheduled training described in LILCO's response to Interrogatory No. 22.

**Suffolk County Interrogatory No. 24**

For each activity identified in response to Interrogatory 22, provide all documents concerning the activity.

**Response:** LILCO will make these documents available for inspection by Suffolk County at LILCO's place of business at a mutually agreed upon time and date. At Suffolk County's expense, LILCO will engage an outside service to copy documents Suffolk County wants produced.

**Suffolk County Interrogatory No. 25**

Provide copies of any evaluations, critiques, reviews and/or analysis and summaries concerning the adequacy, effectiveness, or appropriateness of performance of exercise players during the Exercise, other than the April 17, 1986 FEMA Post Exercise Assessment Report.

**Response:** The vast majority of documents that are responsive to this request are the forms that were completed by LILCO controllers and observers. These documents are addressed in LILCO's responses and objections to Suffolk County Interrogatories Nos. 8, 27 and 31.

In addition, summaries of LILCO controller/observer comments on the exercise were compiled at the request of LILCO counsel. LILCO will identify these summaries with greater specificity before the end of the 30-day period. LILCO objects to their production on the grounds of attorney-client privilege and the work product doctrine.

**Suffolk County Interrogatory No. 26**

Identify:

- a. All persons assigned to the LERO "control organization" for the Exercise;  
and,

- b. The "LERO Master Controller" for the exercise. Describe the functions and responsibilities of these people.

**Response:** LILCO objects to Suffolk County Interrogatory No. 26 for the same privacy reasons set forth in LILCO's prior objections to revealing the names of LERO workers. LILCO also objects to this interrogatory as overly broad since it, in part, seeks information about exercise activities that are not the subject of any admitted contention.

Without waiving these objections, LILCO states that there were 10 LILCO personnel assigned as controllers during the February 13 exercise. The functions and responsibilities of these controllers are described on page 1-22 and in Section 7 of the Exercise Scenario which has previously been provided to Suffolk County.

**Suffolk County Interrogatory No. 27**

Provide copies of all documents concerning the Exercise prepared by the persons identified in response to the prior Interrogatory prior to, during, or after the Exercise.

**Response:** Controllers also served as observers during the Exercise. The documents prepared by LILCO controllers in their role as observers have already been addressed in response to Suffolk County Interrogatory No. 8. At the present time, LILCO has been unable to identify any controller message that a LILCO controller may have given to any collection of exercise players, except for those messages contained in the exercise scenario and in the offsite documents which have been provided to Suffolk County.

**Suffolk County Interrogatory No. 28**

Identify all persons assigned as LILCO evaluators during the Exercise. Describe the functions and responsibilities of these people.

**Response:** During the February 13 exercise, non-players were divided into four categories: controllers, evaluators, observers and visitors. There were no "LILCO evaluators" during the exercise.

**Suffolk County Interrogatory No. 29**

Provide copies of all documents concerning the Exercise prepared by the persons identified in response to the previous Interrogatory prior to, during, or after the Exercise.

**Response:** There are no documents which are responsive to this request. See LILCO Response to Suffolk County Interrogatory No. 28.

**Suffolk County Interrogatory No. 30**

Identify all persons assigned as LILCO observers during the Exercise. Describe the functions and responsibilities of these people.

**Response:** LILCO objects to Suffolk County Interrogatory No. 30 for the same privacy reasons set forth in LILCO's prior objections to revealing the names of LERO workers. LILCO also objects to this interrogatory as overbroad since it, in part, seeks information about exercise activities that are not the subject of any admitted contention.

Without waiving these objections, LILCO states that there were 37 LILCO personnel assigned as observers during the February 13 exercise. This does not include the 18 people from Hunton & Williams who were present at the Exercise in either the classification of "observers" or "visitors." The functions and responsibilities of LILCO observers are described in Section 7 of the exercise scenario, which has previously been provided to Suffolk County.

**Suffolk County Interrogatory No. 31**

Provide copies of all documents concerning the Exercise prepared by the persons identified in response to the previous Interrogatory prior to, during, or after the Exercise.

**Response:** The documents prepared by LILCO observers (other than legal personnel) have already been provided or withheld under objection in response to Suffolk County Interrogatory No. 8. LILCO objects to the production of notes taken by legal personnel on the ground of the work product doctrine.

**Suffolk County Interrogatory No. 32**

Provide all lists of items to improve the plan and procedures prepared by LERO players or other persons, provided prior to, during, or after the Exercise, to any LILCO or federal:

- a. evaluators;
- b. simulators;
- c. controllers;
- d. other personnel.

**Response:** LILCO objects to this request to the extent that it seeks lists not generated in reference to the Exercise. As such the request is overly broad and not reasonably calculated to lead to the discovery of evidence admissible in this proceeding. To the extent the request seeks relevant information LILCO can identify Rev. 7 and Rev. 8 to the Plan, and the submittal documents which accompanied them, as a collection of improvements related to the Exercise.

Without waiving its objection, LILCO is currently identifying other documents which are responsive to this request. Within the 30-day time period for responding to requests for document production, LILCO will provide a specific description of the documents which are responsive to this request and will make any additional objections as appropriate.

**Suffolk County Interrogatory No. 33**

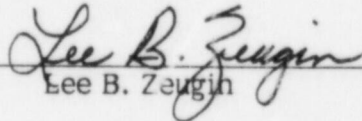
Provide copies of any documents of any kind relating to the Exercise and not previously produced, including, by way of example only, evaluator, controller, observer and/or player logs, messages and notes, whether produced or generated by LILCO, LERO, or non-LILCO organizations or individuals.

**Response:** LILCO objects generally to this interrogatory as overly broad and unduly burdensome. Litigation involving the Shoreham Emergency Plan has been ongoing for more than four years. During that time, Suffolk County has demonstrated a detailed understanding of the Shoreham Emergency Plan, the LERO organization and the training program for LERO workers. Given this background understanding together with the finite set of events that occurred during the February 13 Exercise and the

extensive information discovery LILCO has already provided to Suffolk County, LILCO would have expected more focused requests aimed at admitted contentions. This interrogatory seeks an endless array of documents from at least a year before the February 13 Exercise to the present. The vast majority of these documents have little or no relevance to admitted contentions.

Objections Stated by Counsel

All objections and references to objections were stated by counsel.

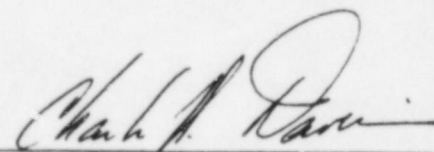
  
Lee B. Zeugin

Donald P. Irwin  
Lee B. Zeugin  
Karen L. Donegan  
HUNTON & WILLIAMS  
P.O. Box 1535  
707 East Main Street  
Richmond, Virginia 23212

October 27, 1986

VERIFICATION

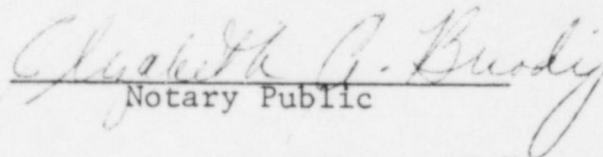
Charles A. Daverio, being first duly sworn on oath, deposes and says: that he is currently the Assistant to the Vice President for Nuclear Operations for Long Island Lighting Company; that he has personal knowledge of a portion of the subject matter of this litigation; that responsible corporate employees have provided him with additional facts necessary to provide the information contained in the foregoing Answers to Interrogatories; that he has read the answers, and knows the contents thereof; and that based upon such information of which he has personal knowledge and with which he has been provided, he is informed and believes the matters stated therein to be true, and on these grounds alleges that the matters stated therein are true and therefore verifies the foregoing on behalf of Long Island Lighting Company.



Charles A. Daverio

State of New York) SS:

I, Elizabeth A. Brady, a Notary Public in and for the jurisdiction aforesaid, hereby certify that Charles A. Daverio, whose name is signed to the foregoing Answers to Interrogatories, dated February 27, 1986, has personally sworn before me that the statements therein are true to the best of his knowledge and belief.

  
Notary Public

My Commission expires:

March 30, 1987

ELIZABETH A. BRIDY  
Notary Public, State of New York  
No. 304606103  
Qualified in Nassau County  
Commission expires Mar. 30, 1987

RELATED CORRESPONDENCE

DOCKETED  
USNRC

CERTIFICATE OF SERVICE

'86 OCT 29 AIO:53

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

I hereby certify that copies of LILCO's Responses and Objections to Suffolk County First Set of Interrogatories and Request for Production of Documents Dated October 10, 1986 were served this date upon the following by first-class mail, postage prepaid.

John H. Frye, III, Chairman  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory Commission  
East-West Towers, Rm. 407  
4350 East-West Hwy.  
Bethesda, MD 20814

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

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

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

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

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

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

Herbert H. Brown, Esq.  
Lawrence Coe Lanpher, Esq.  
Karla J. Letsche, Esq.  
Kirkpatrick & Lockhart  
Eighth Floor  
1900 M Street, N.W.  
Washington, D.C. 20036

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

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

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

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

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

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

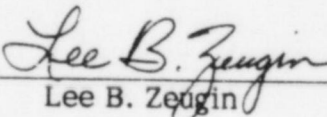
Jonathan D. Feinberg, Esq.  
New York State Department of  
Public Service, Staff Counsel  
Three Rockefeller Plaza  
Albany, New York 12223

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

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

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

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

  
\_\_\_\_\_  
Lee B. Zeugin

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

DATED: October 27, 1986