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~~DELATED CORRESPONDENCE~~

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF GENERAL COUNSEL  
REGULATORY AND SAFETY  
ADJUDICATION DIVISION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
Carolina Power & Light Company	)	Docket No. 50-400-OLA
	)	
(Shearon Harris Nuclear Power Plant)	)	ASLBP No. 99-762-02-LA
	)	

**ORANGE COUNTY'S FIRST SUPPLEMENTAL RESPONSE  
TO NRC STAFF'S FIRST SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO THE BOARD OF COMMISSIONERS OF ORANGE COUNTY**

Orange County hereby responds to the document production requests contained in NRC Staff's First Set of Interrogatories and Requests for Production of Documents Directed to the Board of Commissioners of Orange County (September 8, 2000) ("Staff's First Discovery Requests").

**I. GENERAL OBJECTIONS**

These general objections apply to the County's responses to all of the Staff's First Discovery Requests.

1. The County objects to the Staff's instructions and definitions on the grounds and to the extent that they request or purport to impose upon the County any obligation to respond in manner or scope beyond the requirements set forth in 10 C.F.R. §§ 2.740, 2.741, and 2.742.

2. The County objects to the Staff's discovery requests to the extent that they request discovery of documents protected under the attorney-client privilege, the attorney work-product doctrine, and limitations on discovery of trial preparation materials and experts' knowledge or opinions set forth in 10 C.F.R. § 2.740 or other protection provided by law.

Template = SECY-035

SECY-02

3. The County objects to the Staff's discovery requests to the extent they seek discovery beyond the scope of Contention EC-6 as admitted by the Board in this proceeding. The Staff is permitted only to obtain discovery on matters that pertain to the subject matter with which this proceeding is involved. 10 C.F.R. § 2.740(b).

## **II. RESPONSE TO DOCUMENT PRODUCTION REQUESTS**

**DOCUMENT REQUEST NO. 1** All documents requested by, and provided to, the Applicant pursuant to Applicant's First Set of Discovery Requests Regarding Contention EC-6 Directed to the Board of Commissioners of Orange County dated August 30, 2000, at 5-10.

**RESPONSE TO REQUEST NO. 1:** Orange County has made available documents responsive to both the Staff's and Applicant's document production requests at the offices of Harmon, Curran, Spielberg & Eisenberg in Washington, D.C. Please note that Orange County has not attempted to reproduce studies prepared by the NRC Staff or its contractors, which are available to the NRC Staff in its own files. These documents are listed in Appendix A to this discovery response, entitled "BCOC Bibliography for Environmental Contention, Version of 29 September 2000."

**DOCUMENT REQUEST NO. 2.** All documents that are identified, referred to or used in responding to all of the above general and specific interrogatories and any subsequent interrogatories and requests for admissions relating to contention EC-6. Specify the interrogatory to which each document relates, and the exact line(s), page(s), or section(s) where applicable.

**RESPONSE TO REQUEST NO. 2:** Orange County will provide copies of all documents which are identified, referred to or used in responding to interrogatories. It will also endeavor to provide documentary citations in its interrogatory responses, to the extent that it is able to respond to interrogatories before the close of discovery.

**DOCUMENT REQUEST NO. 3.** All documents (including experts' opinions, work papers, affidavits, and other materials used to render such opinion) supporting or

otherwise relating to affidavits, declarations, testimony or evidence that you intend to use in your Subpart K presentation and/or the hearing on Contention EC-6.

**RESPONSE TO REQUEST NO. 3:** See response to Request No. 1.

**DOCUMENT REQUEST NO. 4.** Provide any and all studies Dr. Gordon Thompson has conducted regarding the probability of nuclear reactor accidents, indicating whether these studies have been peer reviewed and which studies are relevant and contain information related to the probability of the seven part accident sequence referenced on page 13 of the Board's August 7, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 4:** See response to Request No. 1. Orange County objects to this request to the extent that it requests information on whether these studies have been peer reviewed, on the ground that the term "peer review" is not defined in the question. Dr. Thompson will be prepared to address this question in his deposition on October 16, 2000, provided the term is defined. Of the studies produced by Orange County, the County considers that the following are irrelevant to Contention EC-6:

High-Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy (June 1998)

High-Level Radioactive Liquid Waste at Sellafield: An Updated Review (June 2000)

A Review of the Accident Risk Posed by the Pickering 'A' Nuclear Generating Station (August 2000)

Hazard Potential of the La Hauge Site: An Initial Review (May 2000)

Risk Implications of Potential New Nuclear Plants in Ontario (November 1992)

No Restart for K Reactor (October 1991)

**DOCUMENT REQUEST NO. 5.** Any and all documents, studies or data relied upon by Dr. Gordon Thompson in any of the studies provided in response to Document Request No. 4.

**RESPONSE TO REQUEST NO. 5:** Orange County objects to this request to the extent that it requests documents that are not relevant to Contention EC-6. As discussed above, not all of the

studies prepared by Dr. Thompson and produced by Orange County are relevant to Contention EC-6. All documents studies, and data used by Dr. Thompson in his reports are cited therein. Relevant documents have been produced. If the Staff seeks any additional specific studies identified in those reports which are not publicly available, the Staff should contact counsel for Orange County.

**DOCUMENT REQUEST NO. 6** All documents upon which Dr. Gordon will rely for his opinion and/or testimony relating to Shearon Harris Nuclear Power Plant and the probability of the seven part accident sequence referenced on page 13 of the Board's August 7, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 6:** See response to Request No. 1.

**DOCUMENT REQUEST NO. 7.** Provide all sources, including but not limited to documents, records, statements or treatises, upon which Dr. Gordon Thompson relies in calculating the probability of the seven event accident sequence described on page 13 of the Board's August 7, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 7:** See response to Request No. 1.

**DOCUMENT REQUEST NO. 8.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 1 on page 17 of the Board's August 17, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 8:** See response to Request No. 1.

**DOCUMENT REQUEST NO. 9.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 2 on page 17 of the Board's August 17, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 9:** See response to Request No. 1.

**DOCUMENT REQUEST NO. 10** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 3 on page 17 of the Board's August 17, 2000, Memorandum and Order.

**RESPONSE TO REQUEST NO. 10:** Orange County objects to this request to the extent that it seeks documents reflecting legal opinions or conclusions. With respect to factual information, *see* response to Request No. 1.

**DOCUMENT REQUEST NO. 11.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of a degraded core accident with containment failure or bypass at the Harris Nuclear Plant.

**RESPONSE TO REQUEST NO. 11:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 12.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, mechanisms for containment failure or bypass that could affect accessibility of spent fuel pool cooling and makeup systems at the Harris Nuclear Power Plant.

**RESPONSE TO REQUEST NO. 12:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 13.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, mechanisms for degraded core accident that could affect accessibility of spent fuel pool cooling and makeup systems at the Harris Nuclear Power Plant.

**RESPONSE TO REQUEST NO. 13:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 14.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, radiation doses at the Harris Nuclear Power Plant that would occur following a degraded core accident with containment failure or bypass.

**RESPONSE TO REQUEST NO. 14:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 15.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the inability to restart any pool cooling or makeup systems at the Harris Nuclear Plant due to extreme radiation doses.

**RESPONSE TO REQUEST NO. 15:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 16.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the loss of most or all pool water at the Harris Nuclear Plant through evaporation following the loss of pool cooling and makeup systems.

**RESPONSE TO REQUEST NO. 16:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 17.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the initiation of an exothermic oxidation reaction in pools C and D at the Harris Nuclear Plant following a partial or complete loss of spent fuel pool water.

**RESPONSE TO REQUEST NO. 17:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 18.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of an accident involving the initiation of an exothermic oxidation reaction in pools C and D at the Harris Nuclear Plant following a partial or complete loss of spent fuel pool water.

**RESPONSE TO REQUEST NO. 18:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 19.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of the propagation of an exothermic oxidation reaction between adjacent assemblies in pools C and D at the Harris Nuclear Plant following the initiation of such a reaction.

**RESPONSE TO REQUEST NO. 19:** *See* response to Request No. 1.

**DOCUMENT REQUEST NO. 20.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, contention EC-6 that were used to develop the February, 1999 report by Dr. Gordon Thompson entitled "Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant." This includes any documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding probabilities, dose consequences, and inaccessibility to reestablish cooling within the scope of contention EC-6.

**RESPONSE TO REQUEST NO. 20:** All documents responsive to this request are identified in Dr. Thompson's February 1999 report. To the extent that they are relevant to Contention EC-6, they have been produced. If the Staff seeks copies of specific documents identified in the report that are not publicly available and have not already been produced, it should contact counsel for Orange County.

**DOCUMENT REQUEST NO. 21.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, contention EC-6 that are referenced in the February, 1999 report by Dr. Gordon Thompson entitled "Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant." This includes any documents relevant to, or reasonably calculated to lead

to the discovery of relevant information regarding probabilities, dose consequences, and inaccessibility to reestablish cooling within the scope of contention EC-6.

**RESPONSE TO REQUEST NO. 21:** See response to Request No. 20.

**DOCUMENT REQUEST NO. 22.** All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, any proceeding in which Dr. Gordon Thompson has been a witness or a consultant on any subject within the scope of contention EC-6. This request includes, but is not limited to: any deposition transcripts, testimony, affidavits, declarations, or expert reports sponsored in whole or in part by Dr. Gordon Thompson; any documents considered or relied on by Dr. Gordon Thompson in developing such testimony, affidavits, declarations, or expert report documents; any deposition transcripts, testimony, affidavits, declarations or expert reports filed by other parties to the proceedings; and any documents turned over by Dr. Thompson or any party in discovery.

**RESPONSE TO REQUEST NO. 22:** See response to Request No. 4.

Respectfully submitted,



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**Appendix A: BCOC Bibliography for Environmental Contention**  
**Version of 29 September 2000**

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