

RAS 1050

RELATED CORRESPONDENCE

DOCKETED  
USNRC

'99 October 13, 1999

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket No. 50-400-LA
CAROLINA POWER & LIGHT	)	
COMPANY	)	ASLBP No. 99-762-02-LA
	)	
(Shearon Harris Nuclear Power Plant)	)	
	)	

**ORANGE COUNTY'S SECOND SUPPLEMENTAL RESPONSE TO  
APPLICANT'S FIRST SET OF DISCOVERY REQUESTS AND FIRST  
SUPPLEMENTAL RESPONSE TO NRC STAFF'S FIRST SET OF DISCOVERY  
REQUESTS**

Orange County hereby provides a supplemental response to the Applicant's First Set of Discovery Requests (August 16, 1999), and the Nuclear Regulatory Commission Staff's First Set of Discovery Requests (August 23, 1999). The purpose of this supplemental response is to clarify that Dr. Gordon Thompson will be the County's sole witness on contention TC-2, and David Lochbaum will be the County's sole witness on Contention TC-3.

**GENERAL INTERROGATORY NO. 2.** For each admitted Orange County contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom Orange County expects to provide sworn affidavits and declarations in the written filing for the Subpart K proceeding described in the Board's July 29, 1999, Memorandum and Order and the general subject matter on which each person is expected to provide sworn affidavits and declarations for the written filing. For purposes of answering this interrogatory, the educational and scientific experience of expected affiants and declarants may be provided by a resume of the person attached to the response.

Template = SECY-035

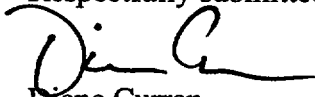
SECY-02

**ORANGE COUNTYS RESPONSE:** Dr. Gordon Thompson will provide a declaration or sworn affidavit in the Subpart K proceeding with respect to contention TC-2. David Lochbaum will provide a declaration or sworn affidavit in the Subpart K proceeding with respect to contention TC-3.

**GENERAL INTERROGATORY NO. 3.** For each admitted Orange County contention, identify each expert on whom Orange County intends to rely on in its written filing for the Subpart K proceeding described in the Board's July 29, 1999 Memorandum and Order, the general subject matter on which each expert is expected to provide sworn affidavits and declarations for the written filing, the qualifications of each expert whom the NRC Staff expects to provide sworn affidavits and declarations for the written filing, a list of all publications authored by the expert within the preceding ten years, and a listing of any other cases in which the expert has testified as an expert at a trial, hearing or by deposition within the preceding four years.

**ORANGE COUNTYS RESPONSE:** Dr. Gordon Thompson will provide a declaration or sworn affidavit in the Subpart K proceeding with respect to contention TC-2. David Lochbaum will provide a declaration or sworn affidavit in the Subpart K proceeding with respect to contention TC-3.

Respectfully submitted,



Diane Curran  
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October 13, 1999

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '99 OCT 15 P4:18

In the Matter of )  
)  
CAROLINA POWER & LIGHT )  
(Shearon Harris Nuclear )  
Power Plant) )

Docket No. 50-400 -OLA  
ASLBP No. 99-762-02-LA

OFFICE OF THE  
GENERAL COUNSEL  
ADJUDICATIONS

**CERTIFICATE OF SERVICE**

I certify that on October 13, 1999, copies of the following documents were served on the service list below by e-mail and/or first class mail as indicated below:

Orange County's Motion for Extension of Discovery Schedule  
Request for Entry Upon Harris Site  
Notice of Deposition of Dr. Ahmad Moccari  
Notice of Deposition of Charles H. Griffin  
Notice of Deposition of R. Steven Edwards  
Notice of Deposition of Mike DeVoe  
Notice of Deposition of Dr. Everett L. Redmond II  
Notice of Deposition of Dr. Stanley E. Turner  
Notice of Deposition of Lawrence Kopp  
Notice of Deposition of Christopher Gratton  
Notice of Deposition of Donald G. Naujock  
Notice of Deposition of James A. Davis  
Notice of Deposition of Kenneth C. Heck  
Orange County's Second Supplemental Response to Applicant's First Set of  
Interrogatories and First Supplemental Response to NRC Staff's First Set of  
Discovery Requests

Secretary of the Commission  
Attention: Rulemakings and Adjudications  
Staff  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
E-mail: hearingdocket@nrc.gov

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Adjudicatory File  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

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I also certify that each of the following deponents was served with a notice of his deposition at the following addresses:

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