

RAS 1049

RELATED CORRESPONDENCE

DOCKETED
USNRC

October 13, 1999

'99 OCT 15 P 4:16

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

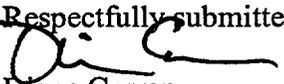
In the Matter of)	
)	
CAROLINA POWER & LIGHT)	Docket No. 50-400-LA
COMPANY)	
(Shearon Harris Nuclear Power Plant))	ASLBP No. 99-762-02-LA

REQUEST FOR ENTRY UPON HARRIS SITE

Pursuant to 10 C.F.R. § 2.741(a)(2), and as agreed to by the parties, Orange County hereby requests entry upon the Harris nuclear power plant site for the purpose of inspecting the spent fuel pool building and associated piping. Pursuant to the parties' agreement, representatives of Orange County will conduct their inspection on October 20, 1999, beginning at 2 p.m. The individuals who will take part in the inspection are as follows:

- Diane Curran, attorney for Orange County
- Dr. Gordon Thompson, expert witness for Orange County
- Dr. Alice Gordon, Orange County Commissioner
- Margaret Brown, Orange County Commissioner
- Paul Thames, Orange County Engineer
- Richard Pratt, Member of Orange County Commission for the Environment

The County will provide identifying information requested by CP&L under separate cover.

~~Respectfully submitted,~~

Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036

Template = SECY-041

SECY-02

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF MIKE DEVOE

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 20, 1999, its counsel will take the deposition upon oral examination of Mike DeVoe, Project Engineer, Nuclear Fuel Services, for Carolina Power & Light Company ("CP&L"). Mr. DeVoe will be deposed with respect to Contention TC-2 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-2, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9:30 a.m. at the offices of CP&L, 411 Fayette Street Mall, Raleigh, NC 27602. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF R. STEVEN EDWARDS

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 19, 1999, its counsel will take the deposition upon oral examination of R. Steven Edwards, Supervisor - Spent Fuel Project, Harris Nuclear Plant, for Carolina Power & Light Company ("CP&L"). Mr. Edwards will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 3 p.m. at the Harris Energy and Environmental Center, 3932 New Hill-Holleman Road, New Hill, North Carolina. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

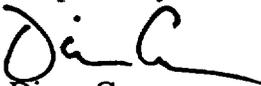
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CAROLINA POWER & LIGHT)	Docket No. 50-400-LA
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(Shearon Harris Nuclear Power Plant))	ASLBP No. 99-762-02-LA

NOTICE OF DEPOSITION OF DR. AHMAD A. MOCCARI

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 19, 1999, its counsel will take the deposition upon oral examination of Dr. Ahmad A. Moccari, Senior Engineer for Carolina Power & Light Company ("CP&L"). Dr. Moccari will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9 a.m. at the Harris Energy and Environmental Center, 3932 New Hill-Holleman Road, New Hill, North Carolina. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

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

NOTICE OF DEPOSITION OF CHARLES H. GRIFFIN

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 19, 1999, its counsel will take the deposition upon oral examination of Charles H. Griffin, Engineer, Corporate Nuclear Engineering, for Carolina Power & Light Company ("CP&L"). Mr. Griffin will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 12:30 p.m. at the Harris Energy and Environmental Center, 3932 New Hill-Holleman Road, New Hill, North Carolina. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

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

NOTICE OF DEPOSITION OF DR. EVERETT L. REDMOND II

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on November 2, 1999, its counsel will take the deposition upon oral examination of Dr. Everett L. Redmond II, Principal Engineer, Holtec International. Dr. Redmond will be deposed with respect to Contention TC-2 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-2, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9 a.m. at the offices of Holtec International, Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF DR. STANLEY E. TURNER

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on November 4, 1999, its counsel will take the deposition upon oral examination of Dr. Stanley E. Turner, Senior Vice President and Chief Nuclear Scientist, Holtec International. Dr. Turner will be deposed with respect to Contention TC-2 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-2, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9 a.m. in the Goya Conference Room at the Four Points Sheraton Hotel, 37611 U.S. Highway 19 North, Palm Harbor, Florida 34684. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF LAWRENCE KOPP

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on November 4, 1999, its counsel will take the deposition upon oral examination of Lawrence Kopp, Senior Reactor Engineer, Reactor Systems Branch, Division of Systems Safety Analysis, U.S. Nuclear Regulatory Commission. Mr. Kopp will be deposed with respect to Contention TC-2 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-2, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 2 p.m. in the Goya Conference Room at the Four Points Sheraton Hotel, 37611 U.S. Highway 19 North, Palm Harbor, Florida 34684. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,


Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

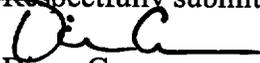
Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF CHRISTOPHER GRATTON

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 29, 1999, its counsel will take the deposition upon oral examination of Christopher Gratton, Reactor Systems Engineer, Plant Systems Branch, Division of Systems Safety and Analysis, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. Mr. Gratton will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 3:00 p.m. at the offices of Harmon, Curran, Spielberg, & Eisenberg, 1726 M Street N.W., Washington, D.C. 20036. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

~~Respectfully submitted,~~


Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF DONALD G. NAUJOCK

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 29, 1999, its counsel will take the deposition upon oral examination of Donald G. Naujock, Technical Reviewer, Materials and Chemical Engineering Branch, Division of Engineering, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. Mr. Naujock will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9 a.m. at the offices of Harmon, Curran, Spielberg, & Eisenberg, 1726 M Street N.W., Washington, D.C. 20036. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF JAMES A. DAVIS

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 29, 1999, its counsel will take the deposition upon oral examination of James A. Davis, Technical Reviewer, Materials and Chemical Engineering Branch, Division of Engineering, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. Mr. Davis will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 12:30 p.m. at the offices of Harmon, Curran, Spielberg, & Eisenberg, 1726 M Street N.W., Washington, D.C. 20036. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036

October 13, 1999

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

NOTICE OF DEPOSITION OF KENNETH C. HECK

Pursuant to 10 C.F.R. § 2.740a, Orange County hereby gives notice that on October 18, 1999, its counsel will take the deposition upon oral examination of Kenneth C. Heck, Quality Operations Engineer, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. Mr. Heck will be deposed with respect to Contention TC-3 in this proceeding. The deponent is hereby instructed to produce at that time all documents upon which he has relied or intends to rely with respect to Contention TC-3, and which have not previously been produced to Orange County by CP&L. The deposition will commence at 9 p.m. at the offices of the Nuclear Regulatory Commission. The deposition testimony will be taken before a duly authorized court reporter under oath and will be transcribed.

Respectfully submitted,



Diane Curran
HARMON, CURRAN, SPIELBERG, & EISENBERG
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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 CLERK
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

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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Carolina Power & Light Co.
411 Fayetteville Street Mall
Post Office Box 1551 - CPB 13A2
Raleigh, NC 27602-1551
E-mail: steven.carr@cplc.com

Susan L. Uttal, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: mlz@nrc.gov

Alice Gordon, Chair
Orange County Board of Commissioners
P.O. Box 8181
Hillsborough, NC 27278
E-mail: gordonam@mindspring.com

Paul Thames
County Engineer
Orange County Board of Commissioners
P.O. Box 8181
Hillsborough, NC 27278

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

Dr. Peter S. Lam
Atomic Safety and Licensing Board
Mail Stop T 3F-23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: psl@nrc.gov

Frederick J. Shon
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Washington, D.C. 20555
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G. Paul Bollwerk, III, Chairman
Atomic Safety and Licensing Board
Mail Stop T 3F-23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: gpb@nrc.gov

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

Michael J. DeVoe
Project Engineer
Nuclear Fuel Services
Carolina Power & Light Co.
P.O. Box 1551
Raleigh, NC 27602-1551

Dr. Stanley E. Turner
Holtec International
230 Normandy Circle East
Palm Harbor, FL 34683

Charles H. Griffin, Engineer
Corporate Nuclear Engineering
Carolina Power & Light Co.
411 Fayetteville St.
P.O. Box 1551
Raleigh, NC 27602-1551

Dr. Everett L. Redmond II
Holtec International
Holtec Center
555 Lincoln Drive West
Marlton, NJ 08053

Christopher Gratton
Reactor Systems Engineer
Plant Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Kenneth C. Heck
Quality Operations Engineer
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James A. Davis
Technical Reviewer
Materials and Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

R. Steven Edwards
Harris Nuclear Plant
Carolina Power & Light Co.
P.O. Box 165 (HNP-124)
New Hill, NC 27562-0165

Lawrence Kopp
Senior Reactor Engineer
Reactor Systems Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Donald G. Naujock
Technical Reviewer
Materials and Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Ahmad A. Moccari
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Harris Energy and Environmental Center
3932 New Hill-Holleman Road
New Hill, NC 27652



Diane Curran