

'99 SEP 22 P4:24

September 20, 1999

RULEMAKING  
ADJUDICATION STAFFUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBefore 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

**APPLICANT'S RESPONSE TO GENERAL INTERROGATORIES  
AND GENERAL DOCUMENT REQUESTS IN THE NRC STAFF'S  
FIRST SET OF DISCOVERY REQUESTS**

Applicant Carolina Power & Light Company ("CP&L") files the following responses to the "NRC Staff's First Set of Discovery Requests Directed to Applicant Carolina Power & Light Company" ("NRC Staff's First Discovery Requests"), which was filed by the NRC Staff ("the Staff") on Friday, September 10, 1999. The Applicant is filing responses to the discovery requests in accordance with the Staff's request for a response to General Interrogatories within 14 days, and General Document Production Requests within 30 days, after service. See 10 C.F.R. §§ 2.740b(b), 2.741(d).

**I. GENERAL OBJECTIONS**

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

1. The Applicant objects to the Staff's instructions and definitions on the grounds and to the extent that they request or purport to impose upon the Applicant 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 Applicant objects to the Staff's discovery requests to the extent that they request discovery of information or 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. The Applicant will provide the Staff with a Privilege Log that identifies documents subject to these privileges and protections, which the Applicant reserves the right to supplement.

3. The Applicant objects to the Staff's discovery requests to the extent they seek discovery beyond the scope of the two contentions, as admitted by the Board in this proceeding. 10 C.F.R. § 2.740(b).

## **II. GENERAL DISCOVERY REQUESTS**

### **A. GENERAL INTERROGATORIES**

Pursuant to agreement between the Staff and the Applicant, these general interrogatories apply to both of the admitted contentions, are in addition to the fifteen interrogatories per contention allowed by the Board's July 29, 1999, Memorandum and Order, and are continuing in accordance with 10 C.F.R. § 2.740(e) through the end of the discovery period, October 31, 1999, as established in the Board's July 29, 1999, Memorandum and Order.

**GENERAL INTERROGATORY NO. 1.** State the name, business address, and job title of each person who supplied information for responding to these interrogatories, requests for admission, and requests for the production of documents. Specifically note for which interrogatories and requests for admissions each such person supplied

information. For requests for production, note for which contention each such person supplied information.

**APPLICANT'S RESPONSE:** In addition to counsel for CP&L, the following persons supplied information in responding to the NRC Staff's First Discovery Requests:

**Interrogatories:**

General Interrogatory No. 2 – None

General Interrogatory No. 3 – None

**Document Production Requests:**

R. Steven Edwards  
Supervisor – Spent Fuel Project  
Harris Nuclear Plant  
Carolina Power & Light  
P.O. Box 165 (HNP-14)  
New Hill, NC 27562-0165  
Contentions 2 and 3

Kevin W. Shaw  
Senior Engineer  
Harris Nuclear Plant  
Carolina Power & Light  
P.O. Box 165  
New Hill, NC 27562-0165  
Contentions 2 and 3

Mike DeVoe  
Project Engineer  
Nuclear Fuel Services  
Carolina Power & Light  
P.O. Box 1551  
Raleigh, NC 27602-1551  
Contention 2

Robert Kunita  
Principal Engineer  
Harris Nuclear Plant  
Carolina Power & Light  
P.O. Box 165  
New Hill, NC 27562-0165  
Contention 2

Jeff Lane  
Mechanical Engineer  
Harris Nuclear Plant  
Carolina Power & Light  
P.O. Box 165  
New Hill, NC 27562-0165  
Contention 3

**GENERAL INTERROGATORY NO. 2.** For each admitted contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom the Applicant 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.

**APPLICANT'S RESPONSE:** The following person has been identified as likely to provide a sworn affidavit or declaration in the written filing for the Subpart K proceeding:

R. Steven Edwards  
Supervisor – Spent Fuel Project  
Harris Nuclear Plant  
Carolina Power & Light  
P.O. Box 165 (HNP-14)  
New Hill, NC 27562-0165  
Area of professional expertise: plant engineering and project management<sup>1</sup>  
General subject matter: overall project, specifically Contention 3.

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<sup>1</sup> A copy of Mr. Edwards' resume is attached to this response.

The Applicant has not yet selected any other person who will provide a sworn affidavit or declaration in the written filing for the Subpart K proceeding described in the Board's July 29, 1999 Memorandum and Order. The Applicant will supplement this response in accordance with 10 C.F.R. § 2.740(e) as it obtains further information.

**GENERAL INTERROGATORY NO. 3.** For each admitted contention, identify each expert on whom the Applicant 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 Applicant 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.

**APPLICANT'S RESPONSE:** The Applicant has not yet selected experts who will provide sworn affidavits or declarations in the written filing for the Subpart K proceeding described in the Board's July 29, 1999 Memorandum and Order. The Applicant will supplement this response in accordance with 10 C.F.R. § 2.740(e) as it obtains further information.

**B. GENERAL DOCUMENT PRODUCTION REQUESTS**

**GENERAL REQUEST.** The Staff requests that the Applicant produce all documents requested by, and provided to BCOC pursuant to Orange County's First Set Of Discovery Requests Directed To The Applicant dated August 6, 1999, at 7-10.


**APPLICANT'S RESPONSE:** The Applicant will make available to the Staff all documents produced to the Board of Commissioners of Orange County ("BCOC") pursuant to BCOC's First Set of Discovery Requests in a document repository located at CP&L's offices in Raleigh, North Carolina, beginning today, Monday, September 20, 1999. The documents will be produced in the same form that they have been produced to

BCOC. The Staff should contact Steven Carr, counsel for CP&L, at (919)546-4161 to gain access to CP&L's document repository.

As discussed in the Applicant's December 23, 1998 license amendment application, some records related to the Harris Fuel Pool Cooling and Cleanup System were inadvertently discarded during a document control records cleanup effort and are no longer available. See License Amendment Application, Enclosure 8 at 2-3.

Respectfully submitted,

Of Counsel:  
Steven Carr  
Legal Department  
CAROLINA POWER & LIGHT  
COMPANY  
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(202) 663-8294  
Counsel For CAROLINA POWER &  
LIGHT COMPANY

Dated: September 20, 1999

## **R. Steven Edwards**

**Summary:** Seventeen years experience in engineering, project management and outage management.

**EXPERIENCE:** Carolina Power & Light Company, June 1982 - Present

**Supervisor, Spent Fuel Pool Project, Harris Plant, Nuclear Engineering (April 1998 - Present)**

Project manager for Harris spent fuel pool 'C' and 'D' activation projects including spent fuel pool cooling and cleanup system completion, spent fuel storage rack design and installation, pool cleanup, and related activities. Responsible for all aspects of scope, cost, schedule and quality of projects. Responsible for study, design and implementation activities. Supervise multi-disciplined modification engineering staff that includes mechanical, civil and electrical engineers that develop plant design change modifications, oversee architect/engineer designs, write procedures, perform 10CFR50.59 analyses, perform ANSI N45.2.11 design verification reviews, and perform owner reviews of A/E developed modifications and calculations. Manage activities of various A/E engineers performing design activities including Bechtel, Sargent & Lundy, Duke Engineering, Raytheon, Protopower and Holtec. Responsible for development of License Amendment Request for SFP Activation project. Provide technical support to spent fuel communications team. Perform root cause evaluations. Serve as Emergency Response Organization Company Technical Spokesperson.

**Manager of Projects, Nuclear Engineering (July 1996 - April 1998)**

Project manager responsible for scope, cost, schedule and quality of various nuclear projects. Responsible for A/E design and analysis. Managed outsource engineering activities (scope development, schedule & cost management, AE negotiations & interface) for preferred and specialty engineering AE's and contractors. Provided group-wide oversight and administration of project management and economic evaluation processes, procedures and activities. Responsible for three-phase project authorization including value-added technical and financial review of projects requiring executive approval. Delivered economic evaluation module at NGG Business Concepts Course. Taught Project Cost Management module for Project Management Institute (PMI) project manager certification course. Developed and delivered various project management/ project controls presentations to industry groups such as Integrated Scheduling & Planning Utility Group (ISPUG) and Institute for International Research Budgeting and Forecasting Conference.

**Director - Project Control, Nuclear Business Operations/ Operations & Environmental Support (October 1994 - July 1996)**

Provided group-wide oversight and administration of project management and economic evaluation processes and activities. Lead development of NGG project management procedure. Responsible for three-phase project authorization. Developed and delivered project management and economic analysis training to plant personnel focusing on fundamentals and NGG specifics. Delivered various project management related presentations to industry groups and internal company management. Managed implementation of integrated project cost/schedule reporting system that combined FAIM financial data with Prestige schedule information. Developed and delivered economic evaluation module of NGG Business Concepts Course. Managed project budgeting team that implemented process to use Prestige schedule and resource data to build budget for

## **R. Steven Edwards**

plant projects. Facilitated development of Long Range Planning process at each nuclear plant. Project management peer group facilitator.

**Director - Information Architecture (Nuclear),** Management Services (August 1992 - October 1994)

Served as management-level liaison and project manager for nuclear related information technology projects. Provided technical and business process perspective for corporately implemented nuclear I/T projects. Coordinated the development of the nuclear portion of the Corporate Information Technology (I/T) Plan including administration of project prioritization process. Evaluated NGG generated requests for I/T products and services including evaluation of business justification, development of cost/benefit analyses and approval of I/S resource allocations.

**Project Engineer - Mechanical Systems,** Technical Support, Robinson Plant  
(June 1991 - August 1992)

Managed staff of four system engineers and two component engineers responsible for operation, performance, reliability and maintenance of various plant NSSS, support and secondary mechanical systems and equipment such as high head safety injection, low head SI/residual heat removal, containment spray, reactor coolant pumps, liquid & gaseous waste disposal, steam generator blowdown, HVAC, make up water treatment, condensate polishing, etc. Provided extensive coaching and mentoring to staff with varied experience/education levels in development of their customer focused, performance oriented system and component engineering skills. Served as refueling outage Technical Support Shift Manager responsible for timely and successful completion of all engineering related outage activities through coordination of efforts with operations, maintenance, corporate engineering and other site management as well as supervision of engineers assigned to emergent activities and planned projects. Served on Emergency Response Organization as Accident Assessment Team - Mechanical Engineer and Emergency Communicator.

**System Engineer - Mechanical Systems,** Technical Support, Robinson Plant  
Senior Engineer (July 1988 - June 1991); Engineer (November 1986 - July 1988)

Supervised staff of contract engineers responsible for specific projects including plant performance monitoring, procedure rewrite, backlog assessment, engineering training program, and work management system development (1990-1991).

System engineer responsible for operation, performance, reliability and maintenance of various mechanical systems including all plant HVAC, containment vessel (civil and support systems), LHSI/RHR, containment spray, post accident containment venting/H2 recombiner, primary and post-accident sampling, etc. (1986-1990). As system engineer, monitored system/equipment performance; performed surveillance tests; developed engineering evaluations, temporary plant modifications, procedures, 10CFR50.59 safety analyses, ANSI N45.2.11 design verification reviews, procurement engineering reviews, etc. Provided oversight to maintenance staff in troubleshooting system/equipment problems. Conducted root cause analyses. Served on Emergency Response Organization as Accident Assessment Team - Mechanical Engineer and Emergency Communicator.



## **R. Steven Edwards**

**Outage Planning and Scheduling Engineer,** Outage Management, Robinson Plant  
Engineer (June 1984 - November 1986); Associate Engineer (June 1982 - June 1984)

Responsible for planning, scheduling and execution of outages and major projects. Developed detail and summary level schedules for forced outages, refueling outages, steam generator replacement outage and normal operating periods using manual CPM and ARTEMIS project management system. Led plan-of-day meetings. Served as field coordinator in outage management organization for major projects such as S/G eddy current.

**PROFESSIONAL DEVELOPMENT:** Attended American Management Association Project Management and Financial Analysis training, Reengineering Fundamentals Seminar, Harvard University In-Place Filter Testing Workshop, industry sponsored ANSI N510 Fan and Filter Testing Workshop, and NCSU Fundamentals of HVAC Design. Participated in company sponsored technical, project management and management/supervisory development training. Engineer in Training Certification - State of North Carolina.

**EDUCATION:** Bachelor of Science in Industrial Engineering, North Carolina State University, May 1982

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
RULEMAKING AND  
ADJUDICATIONS

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

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing "Applicant's Response to General Interrogatories and General Document Requests in the NRC Staff's First Set of Discovery Requests," dated September 20, 1999, was served on the persons listed below by U.S. mail, first class, postage prepaid, and by electronic mail transmission, this 20th day of September, 1999.

G. Paul Bollwerk, III, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
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Attention: Rulemakings and Adjudications  
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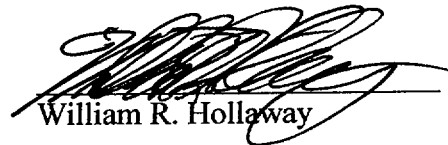
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