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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Re: CP&L and NCEMPA, Shearon Harris Nuclear Power Plant,
Units 1 and 2, Dockets 50-400 and 50-401 O.L.

POST-HEARING SUBMISSION OF WELLS EDDLEMAN, AUGUST 10, 1982¹

Contention 8A is straightforward, especially in light of the DC Circuit Court's refusal to rehear the NRDC v. NRC case. I understand that Court has lifted its stay of the original Order, and thus Table S-3 is invalid. 8B likewise has basis in NRC translation 520 and Cohen's radiotoxicity-of-nuclear-fuel-cycle-products being above that of the parent ores for 11 million years is now referenced to the Pigford article (the best reference I could get from the Sierra Club Radioactive Waste Campaign, my source) per my July 22 letter to George F. Trowbridge. 8(c)^{*} details the failings of the AE C modeling. I did not feel it necessary to provide more cites since NRC admitted these models were used, in the 11.11.79 Washington Post article re NRC translation 520. 8(D)^{**} is clear -- the NRC used the lower absorption values for radionuclides, not the highest or higher ones, which would be the conservative approach. Again, NRC translation 520, particularly the tables and figures, show

¹As authorized by pages 411-412 of transcript of special prehearing conference July ~~31~~ 13-14, 1982 and Judge Kelley's transmittal of same dated July 27, 1982, served July 28, 1982 (to my former address), Docketing & Service copy received July 30, 1982; original not yet received as of August 9, 1982.

*Ref 8C p.37 end sec.6.1; "Tutorium Umweltshutz" Parameter study of 1978, IFEU, Heidelberg, as cited, and ref. at p.144

**Ref '8D above. Sec. 6.2 pp 37-55, pp11-112; pp 91,51,41,44,48.

this. Re 8E I provided Applicants attorneys, Staff attorneys, and each Board member with a copy of Gofman's Radiation and Human Health (1981) for their use.² In sum, it baffles me how this highly specific contention is so unacceptable to Staff and Applicants. Contention 8 relates to nuclear fuel cycle effects as a whole, not just the operating effluents (Contention 37) and spent fuel (contentions 24-28, 64, etc).

Contentions 1 and 2 might be deferred til the emergency plans exist. Contention 1 goes to the inadequacy of offsite monitoring, especially as it relates to informing emergency planners of what radioactive material is escaping offsite and where it is. NC DHR, as cited, is having to cut back emergency responder training. CP&L has a vice president on the radiation protection commission (RPRC) of North Carolina and has done nothing to correct or improve this situation. I think that's enough basis. The rest has logic: the TLD's offsite can't give real-time information. Even if CP&L's mobile monitors work as they argue, they can't be but one or two places at a time.

Contention 2 is that the Harris plant monitors are ~~inadequate~~ ^{inadequate} and refers to pp TMI-60-62 in Vol 20 of the FSAR, since amended after the contention was filed. The pressurized-ionization (or equivalent) isotope identification capability has been urged on the NRC by its own consultants and I assumed it was a matter of common knowledge not requiring additional documentation. I am now handicapped in digging up my files on these points since I am under doctor's orders not to lift anything of significant weight, which includes most of my files I am unable to search.

My sister, who had been helping me, is out of town. I had limited assistance from one neighbor I was able to phone at home. We had to leave after 25 MIN

² At the end of the special prehearing conference each of them said they had access to it independently, and returned their copies to me, though I made it clear they could keep them and welcome.

I must therefore rely on memory and what's on top of the files. If the Board desires more information I will be glad to supply it as soon as I can. I recognize that more specific references are desirable, but this problem came on me suddenly. I noticed it about 7 pm 7/29, saw my doctor 7/30 and the surgeon later that morning and had the operation 8/2, the earliest possible date. Prior to this time I had been taking care of other pressing work, including the CP&L rate case and other work deferred to work more on this NRC proceeding prior to the special prehearing conference. Thus, I was disabled just at the time I had planned to do most of the research (pulling exact cites from files, etc) for this submission. I am complying with the order the best I can and not asking extension of time to submit this since the doctor's orders now expire September 8 or thereabouts, which is a long delay. I respectfully move and ask the Board to inquire where a more specific cite to a document already cited would help them and make a difference in their judgment on admissibility of any contention(s).

Sorry, I see this one's been discussed. Please ignore ~~part~~

Contention 7 is straightforward, with basis cited. The APS report referenced therein is cited better at p 225 re contention 115.

Contentions 31 and 74 provide basis that the NRC Staff is not living up to 10 CFR 0.735 as cited in July 22 '82 letter to Trowbridge. 10 CFR sect zero is cited at p.97 of the contentions at p. 97. The Sholly & Pollard testimony in support of same is clearly referred to. The Staff's failure to adequately check seismic installations, blueprints and modeling at Diablo Canyon is clearly referred to; the Apex meeting transcript from 4/7/82 was not available to me when the contentions were filed, but is easy to look up -- questions of Dr. Wilson is where it is. This matter deserves airing.

Contentions 117 and 118 might be deferred until there is an evacuation plan. If they are not, I only point out that maps of the 10 mile zone around Harris take in US 64 and (subject to check on my memory) parts of US 1, both major highways on which hazardous substances are transported. No one can be expected to list them all, and some, e.g. gasoline and explosives, are obvious. That wrecks can interfere with evacuations, and do occur, is obvious. Most of the roads are two-lane at least at many points, as can be seen from the map.

Contention 11, amended since Harris has no PVC, has basis in the cited work of Gillen & Clough, and logic. The FSAR and other documents do not address this possibility. (as noted, p.59 of contentions)
The Gillen-Clough work is new information since CLI 2280-21

and the other rules Applicants cite (ARTE pp 117 ff) were adopted.

Please note that re Contentions 15-23, 41-42, 65, 95, 104, 114, 59, 60, 126, 126X, 129 and others as the subject matter of them affects costs and benefits, a petition and affidavits under 10 CFR 2.758 is in preparation. I stand by my discussion of NEPA and its ^{in these Contentions ↓ pp 244-46 + 15-1} requirements for full and fair hearing on effects including ^{19(E)} environmental degradation, unintentional or accidental effects, and costs, of operating or continuing to build SHNPP. In particular, Harris 2 is not "substantially completed" by the criteria of McGuire, 9 NRC 489 (see 491 & note 4, 513). At p. 513 that Board stated that ~~completion~~ ^{as} completion of 52 and 69% ~~at~~ of spring 1976 was the evidence, and found the units "substantially completed" as of that decision date, 4-18-1979 (3 years later).³ Harris 2 is 4% complete (NUREG-0030, vol. 5 #4) and CP&L chairman Smith just recently testified to NCUC (Docket E-2 sub 444, July 1982) that CP&L didn't need to make major expenditures on that unit this year, and needed to retain the flexibility to build it. He described Harris 3 and 4 in similar statements in E-2 sub 4186 in 1981 prior to those units' cancellation within a week of the notice granting the E-2 sub 416 rate increase.

Indeed, I do not concede that Harris 1 is "substantially completed" when most of the TMI action plan has not been applied to it and it is only said to be 60% complete. This is far shy of the 52 to 69% complete 3 years ago standard of McGuire, supra. Completing Harris 1 will cost in excess of \$500 million additional. These matters will be addressed in the petition & affidavits.

³It is worth noting those completion percentages were based on \$939 million for both units, ibid at 514. Duke testified (NCUC Docket E-7 sub 314, Aug-Sept 1981) that the 2 units had by then cost \$1842 million. McGuire #1 by itself was ratebased at a total cost of \$962,692,000 in that case, see Order of NCUC, Feb 11 or 12, 1982.

The following applies to all Eddleman contentions:
The Staff urges that my definitions, etc be ignored. I refer you to pages 11-12 of my 5-14 supplement, p.21 (I) and p.248 (B). This amounts to about 3 pages of information as to why and how the definitions and addenda and incorporations by reference are intended to be used, and that such is common practice of lawyers. The FSAR is such a document, as ^{are} ~~ix~~ CP&L's ~~ix~~ contracts with NCEMPA (NCUC Dockets E-2 sub 436 and E-44, 1981) obviously relevant here since they make NCEMPA co-Applicants, are another. The FSAR contains "references" which do not even specify any document or any author, e.g. ARTE says (p.123) ~~x~~ re steam generators "the extensive testing and favorable operating experience described in the FSAR" -- which, when you look in the FSAR, turns out to be statements that operations and current evaluations are favorable, without naming the authors or titles or anything else about most if not all of said "documentation" referenced. My pages 22-27 and 240-248 contain the bulk of my definitions and addenda. Cross-reference to numbered contentions was all I could do under time pressure, but an index to contentions was provided on 5-14. I intend that to be useful and see no reason why CP&L and NRC Staff can incorporate by reference and define things and I can't.

Re contentions 24-28, 64, 65 and others on radioactive waste transport, I adopt the arguments of CHANGE/ELP/Read and CCNC as my own.⁴ They show the NRC has taken sabotage seriously in other cases. You should here. And the costs apply under NEPA. I supplied more detailed references re info on waste accidents & cask inadequacy 7-22-82 to Trowbridge for CP&L. These are available sources to back up the Sierra Club/Resnikoff 1982 article I've cited.

⁴ Joint "Brief on Spent Fuel Transportation" 4 August 1982

Contention 80 is straightforward and logical: Rainout means more of a plume of radiocative material (routine or accidental release) can fall onto a given point (or be washed by it) than NRC and CP&L modeling assume. Therefore, compliance with 10 CFR 20.106 exposure limits is not assured.

Contention 30, re radioiodine doses and the need for potassium iodide (KI) available to nearby population, may be deferred. If not, it should be admitted based on Takeshi Seo's estimate of radioiodine releases possible (per what he analyz~~es~~es to have happened at TMI -- what may have happened is surely possible). The logic of providing KI protection to day care centers, hospitals, prisons, schools and work crews in light of the cited ER-based wind speeds and times to cover 10 and 50-mile distances (for direct exposure and for food exposure) respectively, is clear. If the possible radioiodine release occurs and such protection is not already in place, ~~excessive~~ ^{excessive} radiation exposure to populations at higher risk (e.g. infants, those in day care) or who cannot be evacuated in the short times available (e.g. people in hosp~~itals~~itals & prisons) is a realistically likely consequence. This is no challenge to the 10- and 50- mile distances. Nor is CP&L's monitoring equipment (ARTE p 149) relevant. What gets out is relevant. The section beginning "do not assure that active and effective (KI)"... (contns p. 95) is another part separate from inadequate monitoring. I.e. this contention is that CP&L hasnot done a,b,c,d,e etc. Even if CP&L did a,b,c that's irrelevant to d,e etc. The contention clearly talks about radioiodine releases with respect to the KI issue.

Although Tom Baxter for Applicants says it's OK to defer Contentions 9 and 43, Staff says they lack basis, 9's vague and 43 has no issue to litigate. So if not deferred,

#9 should stand since it specifies the ^{electrical} equipment qualification problem (will the safety equipment do its job & the isolation of containment be effective?) and points out that the FSAP is inadequate on these points. Re the SEP, etc, this contention can be deferred until they are issued.

#43 can readily be rearranged to say "CP&L lacks safe management capability for Harris because of the company's insufficient acts to assure environmental qualification of safety-related electrical equipment and testing thereof." (43 may have been merged if so please ignore this P)

Contention 44 is similar to 43 and refers specifically to C.F. "Doc" Murphy's 8-20-74 memo re inadequate fire protection/cable installation at nuclear plants including Brunswick, noncompliance with CLI-81-12 (I understand the Court of Appeals for DC has upheld the NRC, which then gave CP&L a compliance delay since CP&L had not complied while suing NRC. This is in contrast to the "rules and rules and you're bound by them until the court orders the NRC to overturn them and the NRC acts on such order" standard usually applied to intervenors. Applicants are allowed to not comply with safety standards while suing to overturn same.). My point is that CP&L's failure to upgrade fire protection at Brunswick, and to see that it was built properly in the first place, casts doubt on CP&L's ability to and commitment to safely build and operate SHNPP. CP&L's 8-year delay since Murphy, construction inspection chief of Region II, NRC, noted the problem, shows what the problem is with CP&L.

Re contention 136 (bald eagles/ endangered species act)
Applicants raise information they sent the NRC June 3 as an objection to my June 5, 1982 filing of this. Given the 4 to 6 weeks it takes the accession lists telling that such info even exists to get to the LPDR (3 to 6 weeks to the PD&R in Washington for Harris, as I observed June 9 and 10 personally), how could I know same? Applicants point out that Section 7D of the Endangered Species Act was adopted in 1978 (after the Harris CP issued) but say the time to consider it was at the CP stage. That is warped logic, and the Staff's argument is identical. They claim it's a site suitability issue, when I asked that habitat be provided elsewhere to make up for the loss. (I've tried to settle some contentions with CP&I re effects on fish from heat, for similar adjustments they could make, but they have declined to make any changes.)

Hartsville, 7 NRC 4341, see at 342, (ALAB-463) requires that Federal agencies (e.g. NRC) take such action necessary to insure that actions authorized by them (e.g. constructing SHNPP) do not jeopardize the continued existence of endangered species (e.g. bald eagles). The Appeal Board goes on to require that all effects be considered (on endangered species) regardless of whether a party raises them, to require consultation with DOI (Interior) and other agencies. All of this is after the CP, and this case is the first opportunity I know of to deal with it.

Re contention #87, NRC's July 16, 1982 Statement of Policy on psychological stress (which Judge Kelley sent to me) seems to say that you can't consider fear of nuclear accident unless a_n accident like TMI has already happened at a given site. Since Harris is not yet operating, if you exclude the decision to build

the plant, no major nuclear accident has occurred there yet. A spent fuel handling accident could happen before commercial operation begins, if this Board should approve shipment of high level nuclear waste as spent fuel rods to the Harris site. The NRC appears to be ordering its Boards to ignore psychological stress everywhere except at Three Mile Island. I think, however, that stress here was induced by TMI also (as stated in Contention 87) and that such an accident could "recur" elsewhere with equal seriousness. (Surely the NRC does not mean to say that only an accident identical to the TMI-2 accident need be feared.) In this regard, the Board Notification introduced at the 1979 remand Harris hearings on CP&L management capability has a graph of rankings of each nuclear unit in various areas. CP&L's Brunswick plant ranks significantly lower than TMI-2 and is one of the ~~lowest~~ lowest in the nation. If NRC really intended to devote more resources to preventing accidents, its July 16 position might have basis. Evidence, e.g. the diversion of resources from safety work and TMI-action work to licensing in 1981-82, the UCS testimony cited re contention 74, tells me otherwise. NEPA provides for consideration of unintended effects -- nuclear accidents and psychological stress are just such. I presume I'm being invited to withdraw #87, but I'd rather have it ruled on and appeal if necessary.

The arguments advanced against #53 (that Harris is inimical to the common defense and security because it's a tempting target) lead me to question whether there can be an meaningful record on, or judgment for, a finding that the plant's operation is OK under 10 CFR 2 appendix A VIII(b)(6) if such contentions are inadmissible.

⁵ May I note here my great disturbance at NRC's recent guidance e.g. in Summer to Boards not to conduct sua sponte review of safety issues?

The point is that ~~if~~ an obvious defense/security issue like contention 53 cannot be raised, how can there be any meaningful findings that Harris is not inimical to the common defense and security? The @ Falklands conflict, or Vietnam or Korea for that matter, make clear that attacks happen without being called wars. among nations technically not at war.

Re contention #102: The radiation level expected (pre-TMI) for a design basis (Class VIII) accident was 10^8 R per hour. CP&L's TMI-action plant radiation monitors top out of their range at 10^8 R/hour. The contention is, this range isn't high enough, so CP&L can't adequately assess an accident of great severity, even though simple steps like lead shielding could cure the problem.

#108 has been misinterpreted as saying you have to stage a Class IX accident to test SHNPP components under conditions such as you would reasonably expect in a Class IX accident. Hardly, but you need a good test facility and careful testing of Harris components not yet installed, or components identical to those there (e.g. at VC Summer, or at manufacturing plants) under severe radiation, and other expected accident stresses. The technical parameters that need testing are laid out (p.215 ...) and once the relevant parameters of the devices are known, verification on-site (e.g. that the frequency response of a pump for seismic and other loads, e.g. water hammers, is comparable as-installed to such response as-tested) can be accomplished. That is, the equipment should be qualified to assure shutting the plant down. Note the "or" at the 4th line on page 216. If testing for Class IX conditions violates the rules, OK. But testing for Class VIII and lower would not violate the rules, and that part of the contention should still be admitted.

The second section of #102 (pp216-217) concerns the failure to collect operating experience information on named systems in order to avoid control systems interactions that could cause severe accidents up to and including Class IX. Contention 107 is incorporated by reference here: see especially 107(L) at pp 214-215 which gives a clear basis in Basdekas' 4-29-82 presentation to the NRC. The statements of contentions 47-51 are incorporated by reference in #107, and the withdrawal of those contentions or parts thereof was not intended to say they are invalid as basis for other contentions. Specific reference is also made here to NUREG-0606 Task A-17, systems interaction. Since Harris is so old, it will necessarily require and be subject to more backfitting and more backfitting judgment, given its design pre-1971 and fabrication of components then and since, and construction, in an ever-changing regulatory environment. That is the special relation of Harris to this overall problem. I believe Harris' 14 years from announcement to predicted in-service date, and its long delay (until 1978) in beginning construction, known facts, back this up. But my point is it's just logical that Harris, being so old, is almost uniquely subject to more backfits and thus to more systems interaction problems. (That covers #107 too.)

#111 has basis in the statements of Dr. Hanauer of NRC, and NUREG-0585. That is, there is not assurance the safety systems at Harris will work, due to interactions. Again, Harris' being designed so long ago and much backfitted compound the problem and make the question particularly applicable to this plant.

#10 is, I believe, straightforward. These WCAPS are not "illustrative" as Applicants blithely claim to the Board, but in most cases are the basis or hidden source of safety claims

throughout the FSAR. The problems on p.53 that Westinghouse can have are logical, based e.g. on my ~~xxxx~~ consulting experience.

But there is another major part of this contention: that NRC staff hasn't completed its review of most of these WECAPS. The result is that non-approved analysis is put into some of the most important parts of the FSAR, e.g. re accident conditions (top of p.54). Since the Board will not generally oversee the Staff's work unless it concerns an issue raised by an intervenor, I have raised this issue. Certainly the status of NRC review of these documents and NRC's conclusions as to their validity are important to the safety of SHNPP. E.g. NRC may disapprove some of them. Or there may be dissenting NRC staff opinions of importance, which my experience with FOIA leads me to doubt the ability of any intervenor to uncover. If you ask, NRC replies, identify the specific documents you think we're covering up (in effect). But if the basis of the FSAR and Westinghouse's own design analysis (i.e. these WCAPs) haven't passed NRC muster, the whole "safety analysis" is a house of cards on an unknown foundation. This is certainly insufficient to support a reasonable finding that the Harris plant can operate safely. So the issue should be heard in the interest of a sound record in this proceeding.

References to making this more specific by discovery are not admissions it lacks adequate basis (the basis is right in the FSAR) but rather references to NRC's procedure for making contentions more specific after discovery, amending or revising them. FSAR 15.6 is referenced as basis for the fact that the "safety analysis" for Harris which is (there & elsewhere in Sec. 15) often just a description of the WCAP conclusions. I lay out on p.55 some of the questions that need answers re this matter. I now know I didn't have to say how I'd pursue it, but the plan looks OK to me, and I'd propose to get on with it.

#120 is a straightforward charge that the accident missile analysis insufficiently addresses the problems of damaging or severing insulation, wiring, power supplies and other controls (like air, it's obvious). I read CP&L's FSAR analysis and based this contention on it. I also suggest a solution, energy absorbing devices to protect the controls, wiring and power supplies and control lines. The reason there is this problem is that a lot of the control lines, power supplies, instrument lines etc whose failure can cause an accident, are not considered safety-related equipment. Thus CP&L's analysis inadequately addresses these (ignoring them as non-safety). It also fails to assure that the power supplies and controls to things like the control rods will work under shrapnel conditions inside containment. The proposed solution would much reduce the problem. I think this issue should be heard -- it has all the elements of a contention, and is important to safety.

#130 is like #47 but has not been withdrawn.

#131 I believe was discussed. If not, CP&L's plans to never let borated water reach the bolts/holes are not the same as saying it won't happen. The scenario provided is logical.

#119 I believe has gained some relevance since the NRC released its study on meltdown precursors in July 1982. This contention might have its last part deferred until there is operating experience at VC Summer. Or it might all be deferred until the Staff puts out its Environmental statement.

I believe the joint steam generator contentions already admitted includes the subject matter of I&E Info Notice 82-29 of July 23 '82 (mismailed by NRC to my former address) so that no new contention based on its revelation (p.2) that loose CRD guide tube support pins etc can damage steam generators by

circulating through steam generators, as occurred at North Anna 1 (a plant similar to Harris, see H. FBAR) in May 1982 and can damage as much as 75% of the tube ends before being detected. I think it's appropriate to get this on the record rather than file a separate submission on it. I will not oppose any late response by Applicants or Staff if they don't notice this part. There is no intent to get this by them w/o notice.⁶

#61A is on health effects of radon emissions from uranium mining to get fuel for Harris, has a very clear basis in Gofman (cited to page 469) and Kepford's Feb 19, 1979 response as cited. Damage to lungs from radon exposure (and alpha irradiation generally) is obvious and provides the link to lung diseases.

#62 says CP&L isn't in compliance with ALARA re radionuclide releases from tailings. They have the simple option to require such minimization in their uranium contracts, since the Harris contracted uranium supply is only into the mid-to-late 1980s. ALARA is referenced to Appendix B of NUREG-0859.

#65 and the 6-28-82 amendment cover Daniel International's failures elsewhere, which are relevant as are CP&L's failures at other plants ^{to CP&L's management capability.} You don't become a new company when you work on a new plant. Rather, Daniel's base mat and other void defects record shows a pattern of fouglups. This should be litigated to establish a sound record.

⁶To be sure, I am noting this section by postcard to Charles Barth, lead counsel for NRC Staff, and George F. Trowbridge, lead counsel for Applicants, at their addresses of record in this proceeding.

#67: CP&L says there is no basis because there is likely to be a disposal site. That's arguing the evidence. #67 is ~~quite~~ clear: There is no present assurance that NC will have a site or be in a compact when Harris begins operating, producing low-level radwaste which must be safely disposed of.

#68: One part is the lack of assured disposal for radioactive steam generators from Harris. That can stand on its own (pp 172-73). Another is the filters and resins (p. 173). The section on page 174 gives basis and more than enough detail on the problem of leakage from high-level waste disposal sites. If this is viewed as an attack on the "waste confidence" rulemaking, best to defer it until a rule comes out.

#69 addresses the health effects of leakage from radwaste disposal. It is not an attack on a rulemaking, but rather seeks to litigate the health effects of effluents from waste disposal, in the manner allowed re Table S-3 in the past.

#71 is a test of how much analysis you need. Applicants' vaunted Appendix 3.11 B consists of an assumed top temperature, basis temperature, name of a computer code, diagram of certain fittings and cables, an "illustrative" temperature curve, and a statement that the actual values for Harris are "in the process" of being worked out. That isn't analysis. That's engineering B.S. This contention is clear, its basis is that CP&L hasn't got enough basis for their claims, and it should be admitted so that this question (including the effect of accident conditions in addition to heat, as specified in the contention re Class VIII conditions) can be explored, and the evidence (if any) CP&L can produce to show specifics of analysis for these important safety systems' viability at Harris can be subjected to cross-examination and/or counter evidence.

#73 is clear enough. It should probably be deferred until CP&L submits a complete response to the TMI Action Plan.

#'s 85 and 86 go together and are sufficiently clear. It is not that CP&L's analysis doesn't exist. It's that it's incomplete, and conditions have changed since the CP stage, and CP&L hasn't taken sufficient measures to minimize fish kills, which can occur based on its own data. Deficiencies in CP&L's modeling are specified, e.g. at page 193.

#88 may be deferred until the ES exists.

#92, say Applicants, does not demonstrate an ECCS deficiency with respect to 10 CFR 50 Appendix K. But Appendix K (C.I.) says that a "spectrum of possible pipe breaks shall be considered" No upper end is placed on this spectrum, but it shall include breaks and cracks with areas as large as the cross-section of the largest pipe in the system (primary coolant system). The reactor vessel head ajar is the equivalent of such a break in a different location. Nor does Appendix K set an upper limit on the temperature or pressure causing such an accident. Appendix K does not make a break of the largest primary coolant system pipe the upper end of the spectrum of breaks to consider. If it meant this, it could have said so.

#95 should be deferred until the ES issues.

#101 has enough basis and specifics in it to stand. Recall, it doesn't have to be proved at this stage.

#137 in part points out that training of SHNPP personnel for emergency response is deficient. Applicants gloss over that while arguing against the rest of the contention.

#138, re the electrical drawings, addresses again the inadequate information in the FSAR etc provided to petitioners. It's hard to say ~~x~~what's wrong with something you haven't seen:

PLEASE
defer 138
until I
can review
the drawings

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.)
Shearon Harris Nuclear Power Plant, Units 1 and 2)

Dockets 50-400
and 50401 O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of AUG 10, 1982 SUBMISSION

HAVE been served this 10th day of AUGUST 1982, by deposit in
the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with
an asterisk, for whom service was accomplished by _____

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)
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