DOCKETED

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

'82 DOT 18 A11:51

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	Docket Nos.	50-400 OL
CAROLINA POWER & LIGHT COMPANY		50-401 OL
AND NORTH CAROLINA EASTERN MUNICIPAL) POWER AGENCY	ASLBP No.	82-468-01 OL
(Shearon Harris Nuclear Power Plant,) Units 1 and 2)		

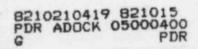
RESPONSE TO QUESTIONS

Now come intervenors Wells Eddleman, Kudzu Alliance (KUDZU), Conservation Council of North Carolina (CCNC), and Chapel Hill Anit Nuclear Group Effort (CHANGE) in response to three questions posed by the Board in the Memorandum and Order of September 22, 1982 at pp. 16-17 and answer those questions as follows:

1. Yes. Intervenors have secured the services of three security plan experts and intend to use one or more of them accepted by the Board. For this purpose, intervenors Eddleman, KUDZU, CCNC and CHANGE have joined together as suggested by the Board and this response is submitted on behalf of all of them.

The experts proposed are:

A. Charlie A. Beckwith (Col. U.S. Army, Ret.) is president of Secruity Assistance Services (SAS) Texas, Ltd., 3445 Executive Center Drive, Austin, Texas 78731.



Col. Beckwith has more than 29 years active duty in the United States Army where he acquired a Top Secret security clearance which he has since maintained. His duties in the military included planning for security operations to deal with nuclear weapons storage and transportation. The corporate experience of SAS of Texas includes formulation of security plans for private corporations and the United States Government; assessment of security forces, equipment and plans which have dealt with defenses against terrorism and other security contingencies.

B. John Richard Maples is Senior Vice-President for Operations and Training of Special Security International, P.O. Box 991, Roanoke, Virginia 24005. Mr. Maples has 11½ years of military experience in the U.S. Army as a bomb technician and doing counterterrorist duty. He has received training in nuclear weapons maintenance and storage and is experienced in nuclear weapons facility security and site security programs.

Special Security International has provided extensive training for United States Treasury, FBI and ATF agents and civil police departments in counter-terrorist operations, bomb threats, and other problem areas. The firm has recently worked with Virginia Electric Power Company (VEPCO) on their security plans for power stations.

C. Richard J. Sanders is Division Manager at Hawkeye Security & Services Division of Chemrad Corporation. They are located at 2007 Louisiana St., League City, Texas 77573. Mr. Sanders spent eight years as Security Supervisor for Iowa Electric & Power Company in Palo, Iowa where he received training in nuclear security and

4

NRC regulations. He also served four years in the United States
Navy working on top secret and classified materials. The Bawkeye
Security firm specializes in nuclear security and provides system
design, training, consulting, implementation and evaluation.

- 2. Intervenors are continuing to contact experienced security personnel as potential experts for this matter. If such additional experts are found, intervenors will notify the Board and parties of their identities and qualifications.
- 3. Yes. A protective order consistent with the one entered in the <u>Diablo Canyon</u> case would be acceptable to the intervenors.

 In anticipation of such an order intervenors point out the following:
- A. For purposes of this matter, Mr. Wells Eddleman has retained an attorney, Deborah Greenblatt (undersigned) to represent him.
- B. Mr. John Runkle, executive co-ordinator of CCNC has, since appearing earlier before the Board, passed the North Carolina Bar, taken the oath and become a licensed attorney. For purposes of this matter he appears for CCNC in that capacity.
- C. CHANGE, while not having retained counsel, joins in the group effort to retain one or more security experts and will rely on counsel for co-intervenors to the extent possible. If necessary, CHANGE will retain counsel in the future.

This the 15th day of October, 1982.

Deborah Greenblatt

Attorney for Wells Eddleman

1634 Crest Road

Raleigh, NC 27606

(919)832-3821

M. Travis Payne
Attorney for KUDZU
Edelstein and Payne
723 W. Johnson St.
P.O. Box 12643
Raleigh, NC 27605
(919)828-1456

John Runkle
Attorney for CCNC
307 Granville Road
Chapel Hill, NC 27514