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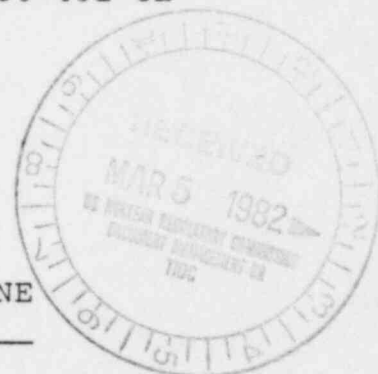
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF GENERAL
COUNSELING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA MUNICIPAL)
POWER AGENCY NO. 3)
)
(Shearon Harris Nuclear Power)
Plant, Units 1 and 2))

Docket Nos. 50-400 OL
50-401 OL



APPLICANTS' RESPONSE TO PETITION TO INTERVENE
BY CHAPEL HILL ANTI-NUCLEAR GROUP EFFORT

On January 27, 1982, notice was published in the Federal Register concerning the application of Carolina Power & Light Company and North Carolina Municipal Power Agency No. 3 (Applicants) for licenses to operate the Shearon Harris Nuclear Power Plant, Units 1 and 2. The notice afforded interested persons an opportunity to request a hearing and to petition for leave to intervene.

On February 17, 1982, a petition to intervene was filed by Chapel Hill Anti-Nuclear Group Effort (CHANGE). CHANGE bases its interest on the interests of individual members some of whom

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reside within approximately 20 miles of the Harris Plant. CHANGE asserts among other things that their interests would be affected by the possibility of nuclear accidents and by radioactive releases from the Plant. The specific aspects of the proceeding as to which CHANGE wishes to intervene include safe operation of the Plant and emergency preparedness. To this extent CHANGE has in Applicants' view sufficiently stated an interest in the proceeding to meet the initial requirements for intervention under Section 2.714 of the Commission's Rules of Practice.

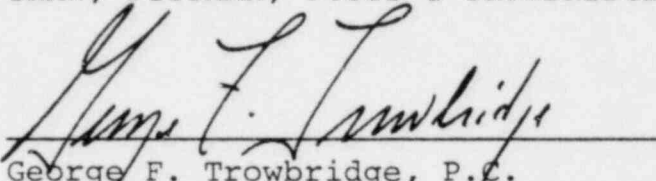
CHANGE has alleged other interests and effects upon those interests, some of which in Applicants' view are not cognizable in an NRC operating license proceeding. Applicants propose, however, to await the formulation of CHANGE's contentions pursuant to Section 2.714(b) and to address at that time the allowability of the contentions, including their relationship to an interest cognizable in the proceeding.

Applicants note that Mr. Read, in addition to signing the CHANGE petition as President of CHANGE, has signed a second petition to intervene on his own behalf, also dated February 17, 1982. In addition, the petitions by Mr. Read and CHANGE were delivered to Applicants' counsel in the same envelope as a petition to intervene by the Environmental Law Project, School of Law, University of North Carolina, although the petitions do

not on their face show any other connection between Mr. Read or CHANGE with the Environmental Law Project. Applicants may at a later date request the consolidation of two or more of these petitioners or the designation of a single individual to represent their interests in the proceeding.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

A handwritten signature in cursive script, appearing to read "George F. Trowbridge", is written over a horizontal line.

George F. Trowbridge, P.C.

Thomas A. Baxter, P.C.

John H. O'Neill, Jr.

Counsel for Applicants

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Dated: March 3, 1982

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Petition to Intervene by Chapel Hill Anti-Nuclear Group Effort," dated March 3, 1982, were served upon the following by deposit in the United States mail, postage prepaid, this 3d day of March, 1982.

James L. Kelley, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
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Dr. James H. Carpenter
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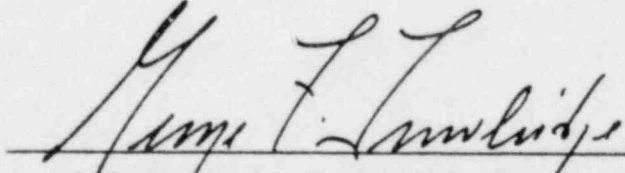
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Mr. Daniel F. Read, President
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Atomic Safety and Licensing Board
Panel
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Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
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George F. Trowbridge, P.C.