

03/18/83

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
CAROLINA POWER AND LIGHT COMPANY	)	Docket Nos. 50-400-OL
NORTH CAROLINA EASTEARN MUNICIPAL	)	50-401-OL
POWER AGENCY	)	
(Shearon Harris Nuclear Power Plant	)	
Units 1 and 2)	)	

NRC STAFF INTERROGATORIES TO  
JOINT INTERVENORS

The NRC Staff hereby requires the Joint Intervenors (CHANGE, CCNC, Kudzu Alliance and Wells Eddleman) pursuant to 10 C.F.R. § 2.740b, to answer separately and fully, in writing and under oath or affirmation, the following interrogatories on or before April 6, 1983.

GENERAL INTERROGATORIES FOR EACH CONTENTION

Provide for each of your contentions numbered I, II, IV, V, VI and VII, separately by each contention, the following information.

INTERROGATORY 1

Identify by name, business or personal address, and telephone number each person upon whom Joint Intervenors rely to substantiate its assertion of inadequacy of Applicant's or Staff analysis.

INTERROGATORY 2

Set forth the professional qualifications of each person identified in response to Interrogatory I.

DESIGNATED ORIGINAL  
Certified by [Signature] DS07

INTERROGATORY 3

Provide a summary of the views of each person identified in response to Interrogatory 1.

INTERROGATORY 4

Identify by author, title, date of publication, publisher, and present location, all books, texts or other graphic material upon which the persons identified in response to Interrogatory 1 rely to substantiate their position.

INTERROGATORY 5

Will Joint Intervenors voluntarily make available to the NRC Staff for inspection and copying all materials identified in response to Interrogatory 4.

INTERROGATORY 6

Identify by name, telephone number and address, all persons which Joint Intervenors intend to use as witnesses at the evidentiary hearings.

INTERROGATORY 7

Set forth the professional qualifications of each person identified in response to Interrogatory 6.

INTERROGATORY 8

Summarize the position of each person identified in response to Interrogatory 6.

INTERROGATORY 9

Have Joint Intervenors, or anyone on its behalf, made any calculations or analysis to substantiate all or any part of Joint Intervenors contention.

INTERROGATORY 10

If the answer to Interrogatory 9 is yes, provide the names, telephone number, and business or personal address of all persons who have made such calculations or analyses.

INTERROGATORY 11

If the answer to Interrogatory 9 is yes, provide a summary of all such calculations or analysis.

INTERROGATORY 12

If the answer to Interrogatory 9 is yes, will Joint Intervenors voluntarily make available to the NRC Staff all such calculations or analysis, or inspection and copying.

INTERROGATORY 13

Provide the name, telephone number and address of each and every person who answered these interrogatories. Where more than one person contributed to an answer, identify each person who contributed to the answer and indicate her or his contribution.

SPECIFIC INTERROGATORIES

JOINT INTERVENORS CONTENTION IV

INTERROGATORY 14

Set forth, by name of manufacturer and model design number of TLD, the sampling distribution which supports your assertion that TLDs are inaccurate.

INTERROGATORY 15

Set forth all relevant parameters of the distribution identified by you in response to interrogatory number 14, including the source of your response.

INTERROGATORY 16

Set forth by manufacturer and model design number the degree of inaccuracy of each model of TLD currently in production in the United States which may be used at the Harris facility.

INTERROGATORY 17

Set forth the test data and/or historical data, and the sources thereof, which support your allegation that TLD's of the generation to be used at Harris are inaccurate.

INTERROGATORY 18

Describe by manufacturer and design model number the portable personnel radiation exposure monitoring instruments (including range, sensitivity, qualifications size and weight) which Joint Intervenors allege are necessary in order to assure adequate protection of worker safety and health at the Harris facility.

INTERROGATORY 19

Are the portable pressurized ionization monitors identified in response to Interrogatory number 18 capable of measuring the cumulative radiation doses required by 10 C.F.R. Part 20?

INTERROGATORY 20

If the answer to the preceding interrogatory is affirmative, set forth the data, and sources thereof, which support your response.

INTERROGATORY 21

Set forth each and every deficiency, in quantitative measures, in the self-reading dosimeters discussed in FSAR §§ 12.5.3.2.2.2 and 12.5.3.6.1.1.

INTERROGATORY 22

Set forth the test or historical data, including the source thereof, which supports your response to Interrogatory 21.

INTERROGATORY 23

Set forth all inadequacies in the self-reading dosimeters discussed in FSAR §§ 12.5.3.2.2.2 and 12.5.3.6.1.1 which would make them incapable of verifying the exposures indicated by the TLDs.

JOINT CONTENTION V

INTERROGATORY 24

Identify by page and line number all defects which you allege to exist in NRC Regulatory Guide 8.25, a copy of which was provided to you by the Applicants.

INTERROGATORY 25

Set forth all authority upon which you rely to support your allegation of defects in response to Interrogatory number 24.

INTERROGATORY 26

Identify each continuous air monitor and each portable air sampler referenced to in your contention number V.

INTERROGATORY 27

Identify all authority used to support your allegation that inspection and calibration of continuous air monitors and portable air samplers annually is insufficient.

JOINT CONTENTION VI

INTERROGATORY 27

Identify each radionuclide which will escape detection by the proposed Harris radiation monitoring and detection system.

INTERROGATORY 28

Identify the source of escape and the escape path of each radionuclide identified in response to Interrogatory 27.

INTERROGATORY 29

Identify which radiation detectors proposed for the Harris facility will fail to detect the radionuclides alleged by you to escape detection and identify which radionuclides will so escape detection.

INTERROGATORY 30

Describe the detection machines, by manufacturer and design model number, which would detect and measure the radionuclides you allege to be undetected by the monitoring system proposed for Harris.

INTERROGATORY 31

Set forth the detection capabilities of the equipment described by you in response to Interrogatory 29 insofar as it relates to radionuclides alleged by you to be undetected by the detection system proposed for Harris.

INTERROGATORY 32

Set forth for each radionuclide you allege will escape detection your authority for asserting that such radionuclide should be detected.

INTERROGATORY 34

Describe the equipment and system which you allege would reduce the detection time for radionuclides over and above that time taken by the processes described in FSAR § 11.5.2.7.

INTERROGATORY 35

Quantify the shorter time period for detection equipment and system proposed by you as opposed to that system proposed by the Applicants.

INTERROGATORY 36

Identify by section number, paragraph, and line number, all defects alleged by you to exist in the radiation detection systems proposed by the Applicants for the Harris facility.

INTERROGATORY 37

Provide the factual basis, test or experience data, which supports each deficiency alleged by you.

Respectfully submitted,

*Charles A. Barth*

Charles A. Barth  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 18<sup>th</sup> day of March, 1983