

March 9, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANTS' INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
TO INTERVENOR WELLS EDDLEMAN (SECOND SET)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Memorandum and Order (Reflecting Decisions Made Following Prehearing Conference)" of September 22, 1982, Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that Intervenor Wells Eddleman answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the

responses to interrogatories below. Under the Commission's Rules of Practice, answers or objections to these interrogatories must be served within 14 days after service of the interrogatories; responses or objections to the request for production of documents must be served within 30 days after service of the request.

These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should you or any individual acting on your behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and you must produce immediately any additional documents you, or any individual acting on your behalf, obtains which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely.

Definitions: As used hereinafter, the following definitions shall apply:

The "ER" is the Environmental Report - Operating License Stage for the Shearon Harris Nuclear Power Plant, as amended.

"Applicants" is intended to encompass Carolina Power & Light Company, North Carolina Eastern Municipal Power Agency and their contractors for the Harris Plant.

"Document(s)" means all writings and records of every type in the possession, control or custody of Wells Eddleman or any individual acting on his behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of Mr. Eddleman; a document shall be deemed to be within the "control" of Mr. Eddleman or any individual acting on his behalf if they have ownership, possession or custody of the document or copy thereof, or they have the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof.

General Interrogatories

1(a). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged, and upon which you relied in formulating allegations in each of the contentions which are the subject of this set of interrogatories.

(b). Identify those facts concerning which each such person has first-hand knowledge.

(c). State the specific allegation in each contention which you contend such facts support.

2(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which you relied in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

3(a). State the name, address, title, employer and education and professional qualifications of each person you intend to call as an expert witness or a witness relating to any contention which is the subject of this set of interrogatories.

(b). State the contention(s) regarding which each such person is expected to testify.

4(a). Identify all documents in your possession, custody or control, including all relevant page citations, pertaining to the subject matter of, and upon which you relied in formulating allegations in each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each such document relates.

(c). State the specific allegation in each contention which you contend each document supports.

5(a). Identify all documents in your possession, custody or control, including all relevant page citations, upon which you relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

6(a). Identify any other source of information, not previously identified in response to Interrogatory 2 or 5, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

7(a). Identify all documents which you intend to offer as exhibits during this proceeding to support the contentions which are the subject of this set of interrogatories or which you intend to use during cross-examination of witnesses

presented by Applicants and/or the NRC Staff on each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each document relates and the particular page citations applicable to each contention.

Interrogatories on Eddleman Contention 29 & 30
(Normal Radioiodine Releases)

29-1. Identify the documents in which Applicants have underestimated radioiodine releases during normal operations.

29-2. Specify the extent to which Applicants have underestimated radioiodine releases during normal operations.

29-3. Provide the analytical basis for your answer to Interrogatory 29-2.

29-4. Are you challenging the radioiodine concentration levels (airborne, on the ground or in vegetation) provided in Table 5.2.2-2 of the ER?

29-5. If the answer to Interrogatory 29-4 is yes, provide the analytical basis for your view.

29-6 (a). Are you challenging the meteorological data used to calculate the concentrations of radioiodines provided in Table 5.2.2-2?

(b). If the answer to 29-6(a) is yes, specify the meteorological data which you are challenging.

(c). If the answer to Interrogatory 29-6(a) is yes, explain the basis for your disagreement(s) with Applicants about the meteorological data used to calculate the concentrations of radioiodines presented in Table 5.2.2-2.

29-7 (a). Are you challenging the source terms used by Applicants to calculate the concentrations of radioiodines presented in Table 5.2.2-2?

(b). If the answer to Interrogatory 29-7 is yes, identify the specific source term(s) which you are challenging because they result in an underestimation of concentrations of radioiodines at the site boundary during normal plant operations.

(c). If the answer to Interrogatory 29-7(a) is yes, provide the analytical basis for your challenge to the source term(s) identified in your response to Interrogatory 29-7(b).

29-8. Are you challenging the expected concentrations of radioiodines in the cooling tower blowdown and the Main Reservoir presented in (a) Table 5.2.2-3a of the ER, or (b) Table 5.2.2-3b of the ER?

29-9. If the answer to Interrogatory 29-8(a) or (b) is yes, provide the analytical bases for your view.

29-10(a). Do you challenge Applicants' use of NRC Regulatory Guide 1.113 to calculate concentrations of radionuclides in the Main Reservoir?

(b). If the answer to Interrogatory 29-10(a) is yes, provide the analytical basis for your view.

(c). If the answer to Interrogatory 29-10(a) is yes, explain how you would change the dispersion model in question or otherwise calculate radionuclide concentrations in the Main Reservoir.

29-11(a). Identify any other disagreements you have with either the assumptions or the analyses used by Applicants in Section 5.2.2 of the ER which relate to Contention 29 & 30.

(b). Provide the analytical basis for your answer(s) to Interrogatory 29-11(a).

29-12(a). Identify any disagreements you have with either the assumptions or the analyses used by Applicants in Section 5.2.4 of the ER to calculate the maximum individual doses from all pathways of radiation exposure, including from radioiodine in the various exposure pathways.

(b). Provide the analytical basis for your answer(s) to Interrogatory 12(a).

29-13(a). Do you disagree with any of the doses provided in Table 5.2.5-1 of the ER because they underestimate radioiodine doses?

(b). If the answer to Interrogatory 29-13(a) is yes, provide the analytical basis for your view.

29-14(a). Do you believe that any of the calculated individual doses from the Shearon Harris facility provided in Table 5.2.5-2 of the ER underestimate radioiodine releases?

(b). If the answer to Interrogatory 29-14(a) is yes, provide the analytical bases for each underestimated dose which you believe is provided in Table 5.2.5-2.

29-15(a). Do you disagree with the use of the Appendix I exposure guidelines used in Table 5.2.5-2?

(b). If the answer to Interrogatory 29-15(a) is yes, explain the basis for your answer.

29-16. Explain in detail what you mean when you state that Applicants "have not demonstrated that normal radioiodine releases will not exceed Appendix I limitations."

29-17. Describe the demonstration that you believe to be necessary in order for Applicants to establish that normal radioiodine releases will not exceed Appendix I limitations.

Interrogatories on Eddleman Contention 37(B)
(Health Effects)

37(B)-1. Identify all of the diseases with which you are concerned in Contention 37(B).

37(B)-2. What level(s) of radiation exposure would increase the risk of diseases identified in response to Interrogatory 37(B)-1?

37(B)-3. For each of the diseases identified in response to Interrogatory 37(B)-1, identify the increased risk which you believe would be caused by the level(s) of radiation exposure identified in response to Interrogatory 37(B)-2.

37(B)-4(a). In Contention 37(B), are you challenging radiation risk estimates used by Applicants, the NRC Staff or the National Academy of Science's Committee on the Biological Effects of Ionizing Radiations (the so-called Beir Committee)?

37(B)-4(b). If you are challenging radiation risk estimates used by Applicants, the NRC Staff or the Beir Committee, identify the specific radiation risk estimate(s) which you are challenging.

37(B)-5. Define "victim" as you use the word in Contention 37(B).

37(B)-6. Specify what you believe would be an accurate estimate of the number of victims of each of the diseases you identified in response to Interrogatory 37(B)-1 caused by the increased risk of radiation exposure with which you are concerned.

Request for Production of Documents

Applicants request that Wells Eddleman respond in writing to this request for production of documents and produce the original or best copy of each of the documents identified or

described in the answers to each of the above interrogatories
at a place mutually convenient to the parties.

Respectfully submitted,

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