

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 RICHARD D. WILSON (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 Richard D. Wilson 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 response 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 obtain 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 pages(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 Richard D. Wilson 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 Richard D. Wilson; a document shall be deemed to be within the "control" of Richard D. Wilson or any individual acting on his behalf if he has ownership, possession or custody of the document or copy thereof, or has 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 the contention which is 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 the 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 educational and professional qualifications of each person you intend to call as an expert witness or a witness relating to the contention which is the subject of this set of interrogatories.

(b). State the subject matter to 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 the contention which is the subject of this set of interrogatories.

(b). State the specific allegation in the 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 contention which is 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 the contention which is the subject of this set of interrogatories.

(b). Identify the particular page citations of each document applicable to the contention.

Interrogatories on Wilson Contention I(g)  
(Health Effects)

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I(g)-1. Describe the phenomenon "bioaccumulation in terrestrial ecosystems" with which you are concerned in Contention I(g).

I(g)-2. What are the "issues" of bioaccumulation in terrestrial ecosystems to which you refer in Contention I(g)?

I(g)-3. Describe how, in your view, Applicants could satisfy your concern about bioaccumulation in terrestrial ecosystems.

I(g)-4. Why is the ER's use of the exposure pathway through grass and milk insufficient?

I(g)-5. Why are you particularly concerned about the pathway that involves plants, flowers, bees and honey?

I(g)-6. Describe all of your particular concerns with respect to the plant-flower-bee-honey pathway.

I(g)-7. Is Contention I(g) concerned about the impact on the environment of the radiation released during normal operation of the Shearon Harris facility?

I(g)-8. If the answer to Interrogatory I(g)-7 is yes, explain what you believe the incremental impact of normal plant operation would be on bioaccumulation in terrestrial ecosystems.

Request for Production of Documents

Applicants request that Richard D. Wilson 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,

*Deborah B. Bauser*

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Dated: March 9, 1983



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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Interrogatories and Request for Production of Documents to CANP (First Set)," "Applicants' Interrogatories and Request for Production of Documents to Intervenor Wells Eddleman (Second Set)," "Applicants' Interrogatories and Request for Production of Documents to Joint Intervenors (Second Set)" and "Applicants' Interrogatories and Request for Production of Documents to Intervenor Richard D. Wilson (Second Set)" were served this 9th day of March, 1983, by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Deborah B. Bauser  
Deborah B. Bauser



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