

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

BEFORE ADMINISTRATIVE JUDGES
Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

DOCKETED
MAR 11 AIO:26

SECRETARY
OF THE BOARD
OF NUCLEAR SERVICE
BRANCH

3 March 1983

In the Matter of

CAROLINA POWER & LIGHT COMPANY
AND NORTH CAROLINA MUNICIPAL POWER
AGENCY NO. 3

Docket Nos. 50-400 OL
50-401 OL

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

RESPONSE TO APPLICANTS' INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Answers To General Interrogatories

- 1 (a) I relied on no one.
(b) See 1(a)
(c) See 1(a)
- 2 (a) No one provided information. I relied on no one.
(b) See 2(a)
- 3 (a) I have not selected any expert witnesses yet.
(b) See 3(a)
(c) See 3(a)
- 4 (a) I used only the FSAR and ER except the reference in response 1 (b) - 1 (a)
(b) See 4(a)
(c) See 4(a)
- 5 (a) (b) See 4(a)
- 6 (a) (b) None
- 7 (a) See 4(a)

DS03

Answers to Interrogatories on Specific Contentions

1(a) - 1(a) My contention is that the ER does not define the extent and impact of chlorine dispersal.

(b) See 1(a)

(c)(d) I have pointed out that the ER neglects to address a specific effluent and environmental impact of the operation of the Harris plant. I have made no further allegations and therefore at this point have done no analysis myself.

1(a) - 2(a) See 1A-1(c)(d) above

(b) See 2(a) above

(c) See 2(a) above

(d) See 1(a) - (c) (d) above

1(a) - 3(a) The NPDES permit is for wastewater discharges. My contention deals with vapor effluent.

(b) See 3(a)

(c) See 3(a)

1(a) - 4(a) See 1(a)-(c)(d) above

(b) See 4(a)

(c) See 4(a)

1(a) - 5 The text of the ER referred to Reference S.3-4-4 by Larson. There was no citation at the end of that section. My point is that this citation is deleted.

1(b) - 1(a) My contention is that chlororganic compounds dispersed in cooling towers vapor may be toxic to the surrounding biosphere.

(b) Chlororganic compounds are formed in chlorinated cooling water.

(Jolley, R.L., W.W. Pitts, F.G. Taylor, S.J. Hartmann and G.Jones, Jr. In: Water Chlorination: Enviromental Impact and Health Effects, Jolley, R.L., H. Corchev, D. H. Hamilton (eds). Proceeding of a conference October 30 - Nov. 4, 1977)

Chlororganic Compounds may be toxic directly, through behavioral effects, and through mutagenesis. (Joiley, R.L., G. Jones, W.W.Pitts, J.E. Thompson Chlorination of Organics in Cooling Waters and Process Effluents. In: Symposium proceedings cited above.)

(c) See I(a) - I(c)(d)

I(c) - I(a) My contention is that sulphuric acid and hydrogen peroxide may be toxic to the surrounding biosphere.

(b) See I(a) - I(c)(d)

(c) See (b)

(d) See (b)

I(d) - I(a) My contention is that "other chemicals" (words from ER) including biocides could be toxic to the biosphere.

(b) See I(a) - I(c)(d)

(c) See (b)

(d) See (b)

I(e)-1 ~~It~~ did not seem reasonable that one small creek could replace the water lost through cooling tower evaporation for 2-unit operation. I have done no numerical analysis.

I(e) - 2(a) It is widely known that the Cape Fear has many industrial waste inputs as well as municipal sewage inputs.

(b) I have not analyzed the composition of the river.

I(e) - 3(a) Yes

(b) See I(e) - 1 above. By "dispersed" I meant spread as vapor or aerosol in the cooling towers' plume.

I(e) - 4(a) I contend that the Cape Fear water, if dispersed, could be toxic to the biosphere.

(b) See I(a) - I(c)(d)

(c) See (b)

1(f) - 1(a) As I stated in the first Prehearing Conference Page 111 my concern is that routine operation of the plant might require more water than could be provided by Buckhorn Creek flow. The Reservoir Reanalysis has confirmed that concern. The point of my contention is that Cape Fear water will be used and that contention 1(e) must therefore be addressed.

(b) See 1(e) - 1 above

(c) See 1(a)

1(f) - 2(a) I contend that there may be times when Cape Fear River Water may be necessary to prevent unacceptably low water level in the main reservoir.

(b) See 1(e) - 1 above

1(f) - 3(a) No

(c) I clarified my concern in the First Prehearing Conference Page 111.

1(f) - 4(a) No

(c) I made no mention of the loss of service of cooling towers scenario.

1(f) - 5(a) No

(c) I made no mention of the Main Reservoir as a back up cooling reservoir.

1(f) - 6(a) No

(c) It is irrelevant to my contentions.

1(f) - 7(a) I contend that the method of calculation is not displayed and therefore cannot be evaluated.

1(f) - 8 There is no documentation of the comparison of rainfall in the Buckhorn Creek watershed and the Middle Creek watershed. The "synthesized" estimate of Buckhorn Creek flow (90 cfs), based on Middle Creek estimates, differed from the measured flow for the period 1973-1977 (79 cfs) by 12%.

1(f) - 9(a) Their equivalence has not been documented.

(b) I have not analyzed this question myself.

1(f) - 10 See above only.

I(f) - 11(a) See I(e)-1 and I(f)-1(a)

I(f) - 12 I do not know the frequency with which water will be used from
Cape Fear river:

Response To Request For Production Of Documents

The document referred to in Response I(b) -1(a) is available at the
North Carolina State University Library.

R Wilson

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.) Dockets 50-400
Shearon Harris Nuclear Power Plant, Units 1 and 2) and 50-401 O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of RESPONSE TO APPLICANTS' INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

HAVE Been served this 8 day of March 1983, by deposit in
the US Mail, first-class postage prepaid, upon all parties whose names are
listed below, except those whose names are marked with an asterisk, for
whom service was accomplished by _____

Judges James Kelly, Glen Bright and James Carpenter (1 copy each)
Atomic Safety and Licensing Board
US Nuclear Regulatory Commission
Washington, DC 20555

George F. Trowbridge (attorney for Applicants)
Shaw, Pittman, Potts, & Trowbridge
1800 M. St. NW
Washington, DC 20036

Office of the Executive Legal Director
Attn Dockets 50-400/401 O.L.
USNRC
Washington, DC 20555

Office of the Secretary
Docketing and Service Station
Attn Dockets 50-400/401 O.L.
USNRC
Washington, DC 20555 (3 copies)

John Runkle
CCNC
307 Granville Rd.
Chapel Hill, N. C. 27514

Travis Payne
Edelstein & Payne
Box 12643
Raleigh, N.C. 27605

Certified by _____

R Wilson

Wells Eddleman
718-A Iredell St.
Durham, N. C. 27705

Phyllis Lotchin, PH.D.
108 Bridle Run
Chapel Hill, N. C. 27514

Dan Read
CHANGE/ELP
Box 524
Chapel Hill, N. C. 27514

Pat & Slater Newman
CANP
2309 Weymouth Court
Raleigh, N. C. 27612

Ruthanne G. Miller, Esq.
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Deborah Greenblatt, Esq.
1634 Crest Rd.
Raleigh, N. C. 27606

Bradley W. Jones, Esq.
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street
Atlanta, GA 30303