

August 24, 1983

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'83 AUG 26 110:38

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

APPLICANTS' SUPPLEMENTAL RESPONSES
TO WELLS EDDLEMAN'S GENERAL
INTERROGATORIES AND INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
ON CONTENTIONS 29 AND 37B TO APPLICANTS
CAROLINA POWER & LIGHT COMPANY, et al.
(SECOND SET)

Applicants Carolina Power & Light Company ("CP&L") and North Carolina Eastern Municipal Power Agency, pursuant to 10 C.F.R. § 2.740, hereby submit the following supplemental responses to "Wells Eddleman's General Interrogatories on Contentions 29 and 37B to Applicants Carolina Power & Light Company, et al. (Second Set)." Applicants' provision of answers to Intervenor Eddleman's Interrogatories should not be deemed an admission of relevancy with regard to the information provided by Applicants or that sought by Intervenor.^{1/} The responses herein are deemed to supplement and incorporate, and do not displace, the answers and objections contained in Applicants' original responses.

^{1/} Applicants' responses dated August 19, 1983 to Intervenor Eddleman's second round of interrogatories (Fourth Set) addressed the supplemental material provided herein.

The following supplemental responses refer to information regarding environmental water samplers which was not included in Applicants' responses to Intervenor Eddleman's first round of interrogatories on Contention 29. Applicants experienced, and continue to experience, difficulty in interpreting Intervenor's extensive and compound interrogatories and originally concluded from the wording of Interrogatory No. 29-1(a) that the first round interrogatories only addressed air samplers. Applicants, in reviewing Intervenor's first and second round of interrogatories have now concluded that the first round of interrogatories may have included references to water samplers as well. Although Applicants feel the issue is uncertain, in an effort to be responsive, Applicants supplement their responses to Intervenor Eddleman's General Interrogatories and Interrogatories on Contention 29 to Applicants Carolina Power & Light Company, et al. (Second Set) as follows:

GENERAL INTERROGATORIES

General Interrogatory No. G-1(c)

<u>Person</u>	<u>Interrogatory No.</u>
Ronald Shearin	29-1(a)-(c), (e), (g).

The above individual is an employee of Carolina Power & Light Company, P.O. Box 1551, Raleigh, North Carolina 27602.

INTERROGATORIES ON CONTENTION 29

Applicants supplement their responses to Intervenors' Interrogatories on Contention 29 as follows:

29-1(a) ANSWER:

Liquid - Surface Water Composite Samplers

<u>Sampler</u>	<u>Location</u>	<u>Location Category</u>
Surface Water Composite	Harris Lake Spillway (SW-26)	(vii), (ix)
Surface Water Composite	Cape Fear River at Lillington Water Plant (SW-40)	(vii), (ix)
Surface Water Composite	Cape Fear River at confluence of the Haw and Deep Rivers (SW-38) [Control Station]	(vii), (ix)

29-1(b) ANSWER: Water samplers listed above collect aliquots to form a composite sample of the surface water at equal time intervals over a 168-hour period such that at least 150 aliquots are collected to comprise a collected volume of at least 8 liters for the time interval. An environmental technician collects the sample weekly and verifies proper operation of the sampler by direct observation and comparison of the indicated versus collected sample volumes.

The analytical results are reviewed by the Environmental Laboratory Supervisor and by the Environmental Principal Specialist. Any concentration value of 2 pCi/l or greater is reported to the NRC.

29-1(c) ANSWER: The applicants have independently determined the accuracy of the samplers by a comparison of actual versus indicated sample volumes collected. This was performed by operating the sampler in the lab for greater than 48 hours, measuring the accumulated volume, dividing the volume by the aliquot volume, and comparing that value to the value indicated on the aliquot counter.

An environmental specialist established the criteria on interpretation of NUREG 0472 specifications and he performed the tests. The tests indicated that the sampling error was insignificant, less than 1 percent, compared to the counting error at the lower limit of detection for iodine in water. See FSAR § 16.2.

The sample volume verification performed weekly at the time of collection is equivalent to calibration.

29-1(e) ANSWER: In environmental sampling, the radioactive material collected is considered sample material and not contamination. The sampler is not known to be subject to "contamination" as defined in Applicants' Response.

29-1(g) ANSWER: Applicants are in possession of the environmental water samplers for SHNPP, which are Hydragard Automatic Liquid Samplers, Model CU.

Request for Production of Documents

Applicants supplement their responses to intervenor's Request for Production of Documents as follows:

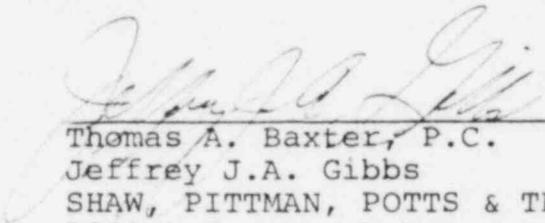
INTERROGATORY

DESCRIPTION

29-1(c)

NUREG 0472, Revision 2, Radiological Effluent Technical Specifications for PWR's (1979)

Respectfully submitted



Thomas A. Baxter, P.C.

Jeffrey J.A. Gibbs

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Dated: August 24, 1983

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

AFFIDAVIT OF B.H. WEBSTER

County of Wake)
) ss.
State of North Carolina)

B.H. Webster, being duly sworn, according to law, deposes and says that he is Manager - Radiological & Chemical Support Section of Carolina Power & Light Company; that the supplemental answers to Interrogatories 29-1(a) to (c), (e) and (g) contained in "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 29 and 37B to Applicants Carolina Power & Light Company, et al. (Second Set)" are true and correct to the best of his information, knowledge and belief; and that the sources of his information are officers, employees, agents and contractors of Carolina Power & Light Company.

B. H. Webster
B.H. Webster

Sworn to and subscribed before
me this 24th day of August, 1983.

Betty J. Hicks
Notary Public

My Commission Expires: September 28, 1985



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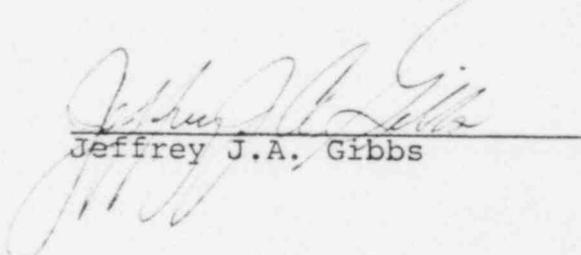
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 29 and 37B to Applicants Carolina Power & Light Company, et al. (Second Set)" were served this 24th day of August, 1983 by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.



Jeffrey J.A. Gibbs

Dated: August 24, 1983

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