

DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION **83 SEP 19 A10:27**BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN )  
MUNICIPAL POWER AGENCY )Docket Nos. 50-400 OL  
50-401 OL(Shearon Harris Nuclear Power Plant, )  
Units 1 & 2) )APPLICANTS' INTERROGATORIES AND REQUEST FOR PRODUCTION OF  
DOCUMENTS ON EDDLEMAN CONTENTION 8F(1)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicants 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, 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 page(s)) upon which you rely.

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

"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 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 such person, other than affiant, who provided information upon which you relied in answering each interrogatory herein, or who otherwise assisted you 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.

(c). For each such person who provided you with information upon which you relied in answering any interrogatory herein or who assisted you in answering any interrogatory herein and who is an expert (i) provide that person's expertise and facts supporting his expertise, (ii) if that person has been "retained or specially employed," state in detail the facts underlying any "retained or specially employed status," (iii) if that person's identity is being withheld, (A) explain the need to withhold such person's identity, (B) state the protection or privilege upon which you rely in withholding the person's identity (see Licensing Board's Memorandum and Order of May 27, 1983).

(d). For each such person who provided you with information upon which you relied in answering any interrogatory herein or who assisted you in answering any interrogatory herein and who is not an expert, identify that person in accordance with the Licensing Board's Memorandum and Order of May 27, 1983.

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 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.

(c). For each such person you intend to call as an expert witness (i) provide that person's expertise and facts supporting his expertise, (ii) if that person has been "retained or specially employed," state in detail the facts underlying any "retained or specially employed status," (iii) if that person's identity is being withheld, (A) explain the need to withhold such person's identity, (B) state the protection or privilege upon which you rely in withholding the person's identity (see Licensing Board's Memorandum and order of May 27, 1983).

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). Identify the contention 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 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 EDDLEMAN CONTENTION 8F(1)

8F(1)-1(a). Do you contend that the primary and secondary air quality standards set by the U. S. Environmental Protection Agency are inadequate to protect the public health and welfare?

(b). If the answer to 1(a) is affirmative, please state all facts which support your allegation that the primary and secondary air quality standards set by the U. S. Environmental Protection Agency are inadequate to protect the public health and welfare. Your answer should include, but not be limited to a list of every study or report (by author, title, date, and indication of which ones you possess) supporting this allegation.

(c). If your answer to 1(a) is other than affirmative, please state how your answer is consistent with contention 8F(1).

8F(1)-2(a). Do you contend that the regulatory structure adopted under the Clean Air Act (42 U.S.C. § 7401 et seq) is inadequate to protect the public health from coal particulate matter?

(b). If the answer to 2(a) is affirmative, please state all facts which support your allegation that the regulatory structure adopted under the Clean Air Act (42 U.S.C. § 7401 et seq) is inadequate to protect the public health from coal particulate matter. Your answer should include, but not be limited to a list of every study or report (by author, title, date, and indication of which ones you possess) supporting this allegation.

(c). If your answer to 2(a) is other than affirmative, please state how your answer is consistent with contention 8F(1).

8F(1)-3(a). Do you contend that the emissions from the hypothetical coal-fired power plant associated with the fuel cycle process to which your contention 8F(1) pertains will violate ambient air quality standards?



(b) If the answer to 3(a) is affirmative, please state all facts which support your allegation that the emissions from the hypothetical coal-fired power plant associated with the fuel cycle process to which your contention 8F(1) pertains will violate ambient air quality standards. Your answer should include, but not be limited to a list of every study or report (by author, title, date, and indication of which ones you possess) supporting this allegation.

(c). If your answer to 3(a) is other than affirmative, please state how your answer is consistent with contention 8F(1).

8F(1)-4. In Contention 8F(1) it is stated that there are "50,000 estimated deaths per year from coal emissions in the US." Please provide the source of this statement in detail including study or report, if any, by author, title and date.

8F(1)-5(a). Do you contend that any release values set forth in table S-3 are inaccurate?

(b). If the answer to the above interrogatory is affirmative, please state all facts which support your allegation that release values set forth in Table S-3 are inaccurate including a list of those specific release values in Table S-3 which are inaccurate.

(c). Please state what you believe would be the accurate release values for those values set forth in answer to Interrogatory 5(b).

8F(1)-6. What do you contend are the health effects of coal emissions given in Table S-3? Your answer should include, but should not be limited to, all documents, expert opinions, or other information upon which you rely in answering this interrogatory.

8F(1)-7(a). Please identify by title, author, and date any study which you have made yourself, which you have had made for you, in which you have participated, or which you have received related to the health effects of coal-fired power plant emissions?

(b). For any study identified in answer to the interrogatory above, please indicate whether you made it, whether you had it made for yourself, whether you participated in it, or whether you simply received it.

8F(1)-8. Please identify any person working with you or for you in any capacity (including employee, consultant, etc.) who may be considered an expert in the health effects of coal-fired power plant emissions.

8F(1)-9. List all proceedings of any nature (including administrative, legal, etc.) in which you have been involved to any extent and where the health effects of emissions from coal-fired power plants were discussed or were an issue. For each proceeding, detail the extent of your involvement therein.

8F(1)-10(a). Do you contend that the health effects of the coal-fired power plant emissions given in Table S-3 of 10 CFR 51.20 are proper to include in a NEPA cost-benefit balance for the Harris Plant?

(b). If your answer to interrogatory 10(a) is affirmative, please state all facts which support your allegation.

(c). If your answer to interrogatory 10(a) is other than affirmative, please state how your answer is consistent with contention 8F(1).

8F(1)-11. List all studies of which you are aware which compare the health effects, if any, of emissions from coal-fired power plants to emissions from nuclear plants?

8F(1)-12. If not provided in answer to the interrogatories above, list any and all studies by author, title and date of the health effects of coal pollution of which you are currently aware.

8F(1)-13. Are you in possession of any documents that discuss or relate to the health effects of effluents from the nuclear fuel cycle?

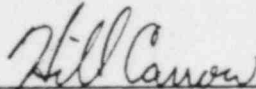
(b). If the answer to Interrogatory 13(a) is affirmative, list all such documents by title, author and date.

#### 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.

This the 16<sup>th</sup> day of Sept., 1983.



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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
RD  
BRANCH

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

Docket Nos. 50-400 OL  
50-401 OL

I hereby certify that copies of "Applicants' Answers to Wells Eddleman's Initial Interrogatories Relating to Eddleman Contention 15-AA", Affidavit of B. M. Williams, "Applicants' Response to Wells Eddleman's Request for Production of Documents (Contention 15-AA)", and "Applicants' Interrogatories and Request for Production of Documents on Eddleman Contention 8F(1)" were served this 16th day of September, 1983 by deposit in the United States mail, first class, postage prepaid, to the parties on the attached Service List.

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Dated: September 16, 1983

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