

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD SEP 28 P2:55

In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)
)
(Shearon Harris Nuclear Power Plant,)
Units 1 & 2))

Docket Nos. 50-400 OL
50-401 OL

OFFICE OF SECRETARY
REGULATORY & SAFETY

APPLICANTS' RESPONSE TO WELLS EDDLEMAN'S
GENERAL INTERROGATORIES AND
INTERROGATORIES ON CONTENTION 8F(1)

Applicants Carolina Power & Light Company Company (CP&L) and North Carolina Eastern Municipal Power Agency, pursuant to 10 C.F.R. § 2.740b, hereby submit the following responses to "Wells Eddleman's General Interrogatories and Interrogatories on Contention 8F(1)". The provision of answers to these interrogatories is not to be deemed a representation that Applicants consider the information sought to be relevant to the issues to be heard in this proceeding.

GENERAL INTERROGATORIES

INTERROGATORY NO. G1(a) Which contentions of Wells Eddleman do Applicants agree are now admitted in this proceeding, NRC Dockets 50-400/401 O.L.?

ANSWER: The contentions of Intervenor Eddleman which are admitted in this proceeding are set forth in Applicants' "Admitted Contentions" dated January 21, 1983, as modified by the Board's "Memorandum and Order (Ruling on Wells Eddleman's Contentions on the Staff Draft Environmental Statement)", dated August 18, 1983.

(b) for each such contention, provide for any answers to interrogatories by Wells Eddleman which Applicants have previously or presently received (except those suspended by Board order, if any), the following information:

DS03

ANSWER: The answers to General Interrogatories herein are restricted to Eddleman Contention 8F(1).

(c) Please state the name, present or last known address, and present or last known employer of each person whom Applicants believe or know (1) has first-hand knowledge of the facts alleged in each such answer; or (2) upon whom Applicants relied (other than their attorneys) in making such answer.

ANSWER: The following list identifies those persons who provided information upon which Applicants relied in answering the interrogatories on Eddleman Contention 8F(1) and indicates the particular interrogatory answer for which each such person provided information.

<u>Person</u>	<u>Interrogatory</u>
Thomas J. Crawford	8F1-1, 8F1-2, 8F1-3
Calvin M. Ogburn	8F1-1

Mr. Crawford is employed by Carolina Power & Light Company, Post Office Box 1551, Raleigh, North Carolina 27602. Mr. Ogburn is employed by CP&L, Shearon Harris Energy and Environmental Center, Route 1, Box 327, New Hill, North Carolina 27562.

(d) please identify all facts concerning which each such person identified in response to G1(c)(1) above has first-hand knowledge.

ANSWER: See Answer G1(c).

(e) please identify all facts and/or documents upon which each person identified in response to G1(c)(2) above relied in providing information to respond to the interrogatory, including the parts of such documents relied upon.

ANSWER: All such facts or documents relied upon by those individuals identified above are indicated within each response to the specific interrogatories on Contention 8F(1).

(f) Please identify any other document(s) used or relied upon by Applicants in responding to the interrogatory.

ANSWER: See Answer G1(e).

(g) Please state which specific fact each document, identified in response to G1(e) and G1(f) above, supports, in the opinion or belief of Applicants, or which Applicants allege such document supports.

ANSWER: Applicants have indicated which specific facts are supported by the

documents identified, within each response to the specific interrogatories on Contention 8F(1).

(h) Please state specifically what information each person identified in response to G1(c)(1) or G1(c)(2) above provided to or for Applicants' affiant in answering the interrogatory. If any of this information is not documented, please identify it as "undocumented" in responding to this section of General Interrogatory G1.

ANSWER: See Answer G1(c).

INTERROGATORY NO. G2(a) Please state the name, present or last known address, title (if any), and present or last known employer, and economic interest (shareholder, bondholder, contractor, employee, etc.) if any (beyond expert or other witness fees) such person holds in Applicants or any of them, for each person you intend or expect to call as an expert witness or a witness in this proceeding, if such information has not previously been supplied, or has changed since such information was last supplied, to Wells Eddleman. This applies to Eddleman and Joint Contentions as admitted, or stipulated by Applicants.

ANSWER: Applicants have not yet identified the expert or other witnesses they expect to call in this proceeding. When and if such witnesses are identified, Applicants will supplement this response in a timely manner.

(b) Please identify each contention regarding which each such person is expected to testify.

ANSWER: See Answer G2(a).

(c) Please state when you first contacted each such person with regard to the possibility of such person's testifying for Applicants, if you have contacted such person.

ANSWER: See Answer G2(a).

(d) Please state the subject matter, separately for each contention as to which each such person is expected to testify, which each such person is expected to testify to.

ANSWER: See Answer G2(a).

(e) Please identify all documents or parts thereof upon which each such witness is expected to, plans to, or will rely, in testifying or in preparing testimony.

ANSWER: See Answer G2(a).

INTERROGATORY NO. G3(a) Please identify any other source(s) of information which Applicants have used to respond to any interrogatory identified under G1 above, stating for each such source the interrogatory to which it relates, and what information it provides, and identifying where in such source that information is to be found.

ANSWER: Applicants have identified all such other sources of information, if any, within the answers to the specific interrogatories set forth herein.

(b) Please identify any other source(s) of information not previously identified upon which any witness identified under G2 above, or other witness, has used in preparing testimony or exhibits, or expects to use in testimony or exhibits, identifying for each such source the witness who is expected to use it, and the part or part(s) of such source (if applicable) which are expected to be used, and, if not previously stated, the fact(s) or subject matter (or both) to which such source relates.

ANSWER: See Answer G2(a).

INTERROGATORY NO. G4(a) Please identify all documents, and which pages or sections thereof Applicants intend or expect to use in cross-examination of any witness I call in this hearing. For each such witness, please provide on a timely basis (ASAP near or during hearings) a list of all such documents, the subject matter Applicants believe they relate to, and make the document(s) available for inspection and copying as soon as possible after Applicants decide or form intent to use such document in cross-examination.

ANSWER: Applicants have not at this time identified which documents, if any, they intend to use in cross-examination of Mr. Eddleman's witnesses.

(b) Please identify any undocumented information Applicants intend to use in cross-examination of each such witness for me.

ANSWER: See Answer G4(a) above.

INTERROGATORY NO. G5(a) for each contention Applicants state or admit is an admitted Eddleman contention under G1(a) above, or an admitted joint intervenor contention, please state whether Applicants have available to them experts and information, on the subject matter of the contention.

ANSWER: Applicants have available to them experts and information on the subject matter of Contention 8F(1).

(b) If the answer to (a) above is other than affirmative, state whether Applicants expect to be able to obtain expertise in the subject matter, and information on it, and if not, why not.

ANSWER: Not applicable.

INTERROGATORY NO. G-6(a) for each document identified in response to any interrogatory herein, or referenced in response to any interrogatory herein, please supply all the following information which has not already been supplied:

- (i) date of the document
- (ii) title or identification of document
- (iii) all authors of the document, or the author
- (iv) all qualifications (professional, technical) of each author of the document

- (v) the specific parts, sections or pages, of the document, if any, upon which Applicants rely
- (vi) the specific information each part, section or page identified in response to (v) above contains.
- (vii) identify all documents used in preparing the document, to the extent known (and also to the extent not identified in the document itself)
- (viii) state whether Applicants possess a copy of the document
- (ix) state all expert opinions contained in the document, upon which Applicants rely, or identify each such opinion.
- (x) identify the contention(s) with respect to which Applicants rely upon (a) the expert opinions (b) the facts identified in the document
- (xi) state whether Applicants now employ any author(s) of the document, identifying each such person for each document.
- (xii) state whether Applicants have ever employed any author(s) of the document, identifying each such person for each document.
- (xiii) identify all sources of data used in the document. Answers to all the above may be tabulated or grouped for efficiency.

ANSWER G6(i) - (xiii): All such information available to the Applicants with regard to each document identified in response to an interrogatory herein is contained in the particular document which is being made available to Mr. Eddleman. It would be particularly burdensome for Applicants to research all historical employment records to determine whether the authors of each document identified herein has ever been employed by Applicants. However, Applicants will supplement this response in a timely manner if and when Mr. Eddleman identifies any such author regarding which he is particularly interested in determining this information.

INTERROGATORY NO. G-7(a) Please identify all documents which Applicants plan, expect or intend to offer as exhibits (other than for cross-examination) with respect to each Eddleman contention admitted in this proceeding which (i) is included in your current response to G1(a), or (ii) is the subject of interrogatories in this set; please state for which contention or contentions each exhibit will be or is expected to be offered.

ANSWER: Applicants have not yet identified those documents they intend to offer as exhibits relating to Eddleman Contention 8F(1).

(b) Please identify all documents which Applicants plan, expect or intend to use in cross-examination of any other parties' witnesses or joint intervenor witness in this proceeding, with respect to (i) Eddleman contentions identified under G-7(a)(i) (or G1-(a)) above, or any other Eddleman contention which is the subject of interrogatories in this set; (ii) each Joint contention now admitted in this proceeding; (iii) per our agreement of 4-8-83, each contention of each other party to this proceeding which is currently admitted. Please identify for each such document the witnesses, or witness, and all contentions with respect to whom (or which) that document is planned, expected, or intended to be offered or used.

ANSWER: Applicants have not yet identified those documents they intend to use for cross-examination of any witness.

(c) Please identify which of the documents identified in response to (b) above (i) will be offered into evidence by Applicants, and (ii) which of the same documents Applicants expect to offer into evidence or intend to offer as evidence or exhibits in this proceeding.

ANSWER: See Answer G7(b).

INTERROGATORY NO. G8(a) Please identify, for each Eddleman contention which is the subject of this or an earlier set of interrogatories, all information not previously identified which was (i) used or relied on in preparation of Applicants' responses to that contention and all contentions superseded by it (per transcript of July 1982 special prehearing conference, the Board's September 1982 order admitting contentions, or stipulation by Applicants or W.E., or otherwise), with respect to any facts alleged therein, identifying for each such fact the specific source(s) of information used or relied upon.

(b) Please identify all persons who supplied information relied on or used in Applicants' response to each contention for which information is requested in G-8(a) above. (ii) Please identify for each such person what information was supplied, and with respect to which contention(s) each item of information supplied was used. (iii) Please state all known qualifications of each such person with respect to the subject matter of the each contention for which that person supplied information.

INTERROGATORY NO. G-9(a) Please identify all information not identified in response to the above general interrogatories, including all documents, which Applicants rely on or intend to use in making their case or carrying their burden of proof in this proceeding, with respect (i) to each Eddleman contention which is the subject of this or an earlier set of Eddleman interrogatories to Applicants; (ii) with respect to each joint contention on which discovery is now open under the Board's March 10, 1983 order, or on which discovery has been open under said order establishing a discovery schedule. (The phrase "or on which discovery has been open" is intended to keep this interrogatory current and continuing for information and documents which Applicants rely on or form intent to use after the formal close of discovery. I interpret Applicants' continuing interrogatories to apply continuously from their date of submission to me, and I intend these to apply likewise.)

OBJECTION: Applicants have previously objected to General Interrogatories G8 and G9 as being overly broad, irrelevant, burdensome and seeking protected and privileged

information. See, e.g., "Applicants' Response to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 64(f) and 67 to Applicants Carolina Power & Light Company, et al. (Second Set)," dated May 27, 1983 at 8-11; "Applicants' Answer to Wells Eddleman's Motions to Compel Discovery Re Applicants' Response to Interrogatories on Contentions 64(f), 67 and 80 and General Interrogatories G-8 and G-9," dated August 31, 1983, at 5-7. Applicants renew their objections here.

INTERROGATORY NO. G-10(a) Where the above general interrogatories, and/or specific interrogatories below, or any of them, call for identification of documents, (i) and no documents are identified, is that the same as Applicants stating that there are no documents responsive to this general interrogatory, in each case where no documents are identified? (ii) and documents are identified, is that the same as Applicants stating that the identified documents are the only ones presently known which are responsive to the interrogatories? (iii) If your answer to G-10(a)(ii) is other than affirmative, please state all reasons for your answer. (iv) If your answer to G-10(a)(i) above is other than affirmative, please state all reasons for your answer.

- ANSWER(a)(i): Yes.
- (ii): Yes.
- (iii): Not applicable.
- (iv): Not applicable.

(b) Where any interrogatory, general or specific, herein, calls for factual information (i) and an opinion is stated in response, is that the expert opinion of any person(s) identified as having contributed information to that response? (ii) and facts are given or identified (or a fact is) in response, but no documents are identified, does that mean Applicants have no documents containing such fact(s)? (iii) If your answer to (i) above is affirmative, please state for each such response all qualifications of each expert upon whom Applicants rely for each such answer. The qualifications need be stated only once for each such person if they are clearly referenced in other answers. (iv) If your answer to (i) above is other than affirmative, please state which opinions, if any, given in response to interrogatories (general or specific) herein is the opinion of an expert, identify each expert whose opinion you used in response to each interrogatory, and state in full the qualifications of each such expert. (v) If your answer to (i) above is other than affirmative, please identify all opinions of non-experts used in your responses, and identify each non-expert whose opinion is included in each answer herein. (vi) If your response to (ii) above is other than affirmative, please identify each document which contains a fact not previously documented in your response(s), stating what the fact is, and at what page, place, chapter or other specific part the document contains such fact.

- ANSWER(b)(i): Yes.
- (ii): See Answers G1(e), (f), and (g) above.
- (iii): See Attachments A and B attached hereto.

(iv): Not applicable.

(v): Not applicable.

(vi): Not applicable

INTERROGATORY NO. G-11 For each answer to each interrogatory herein (or any subpart or part thereof), please identify each item of information in possession of Applicants (including facts, opinions of experts, and documents) which (a) contradicts the answer you made, (i) in whole (ii) in part (please identify each such part for each item of information identified); (b) casts doubt on your answer (i) in whole (ii) in part (please identify each such part for each item of information identified). (c) Please identify all documents not already identified in response to parts (a) and (b) above (and their subparts) which contains any item of information asked for in (a) or (b) above. Please identify for each such document what information item(s) it contains and what answer(s) each such item is related to.

ANSWER G11(a) - (c): Applicants have no such information.

INTERROGATORIES ON 8F1:

INTERROGATORY NO. *8F1-1 (a) What do Applicants believe are the health effects of the coal emissions given in Table S-3? PLEASE state them in detail and explain the basis of your belief, identifying all documents, expert opinions and other information you rely on.

ANSWER: Applicants believe there is no consensus of credible scientific information to identify any adverse health effects known to be associated with the emission totals given in Table S-3.

Air emissions from major coal combustion sources are rigorously evaluated and controlled under the federal Clean Air Act (CAA) and detailed, comprehensive implementing regulations promulgated by the U.S. Environmental Protection Agency. Included in those regulations are national primary ambient air quality standards (CAA, Section 109) promulgated to protect the public health with an adequate margin of safety. Coal-combustion sources must demonstrate, through emissions impact evaluations and the public hearing process, attainment and future maintenance of these national ambient air quality standards (NAAQS); thereby ensuring that emissions would not present any known public health impact.

(b) Have Applicants (i) made any study (ii) had made for them any study (iii) participated in any study (iv) received any studies, of the health effects of coal-fired power plant emissions?

ANSWER: Applicants have not made any study, have not had made for them directly any study, nor directly participated in any study by supplying data or other information, on the health effects of coal-fired power plant emissions. Carolina Power & Light Company is a member of the Electric Power Research Institute (EPRI) and as such provides funding to that organization. Among other things, EPRI has ongoing research into a number of subjects including health effects of coal combustion emissions. Applicants have received five studies concerning such health effects, as follows:

Planning Studies for Measurement of Chemical Emissions in Stack Gases of Coal-Fired Power Plants, EPRI EA-2892 (March 1983) prepared by Southern Research Institute, Battelle, Columbus Laboratories, Roth Associates, Inc.

Controlled Studies of Human Health Effects of Short-Term Inhalation of Atmospheric Pollutants, EPRI EA-3125 (June 1983) prepared by The Professional Staff Association of Rancho Los Amigos Hospital, Inc.

Evaluation of CHESS: Utah Asthma Study 1971-1972, EPRI EA-2829 (February 1983), prepared by Battelle, Pacific Northwest Laboratories.

Evaluation of CHESS: New York Asthma Data 1971 to 1972 (Volume 1: Findings and Supporting Tables), EPRI EA-1994 (August 1981), prepared by Flow Resources Corporation and Roth Associates, Inc.

Evaluation of CHESS: New York Asthma Data 1971 to 1972 (Volume 2), EPRI EA-1994 (August 1981), prepared by Flow Resources Corporation & Roth Associates, Inc.

Applicants will produce these documents for Mr. Eddleman at his request.

(c) For each part of (b) above for which your answer is affirmative, please identify each such study, its authors, title, date and all documents containing it.

ANSWER: See Answer 8F1-1(b).

(d) Are Applicants aware of any other studies of the health effects of coal pollution for which they do not possess a copy of the study?

ANSWER: Applicants are aware of a number of health effects studies of which they do not possess a copy which are cited in "EPRI Research and Development Projects" (EPRI TI-3000-SR, May 1983) and in "Air Quality Criteria for Particulate Matter and Sulfur Oxides" (U.S. EPA-ORD, External Review Draft No. 2, February 1981). Applicants will make these documents available for Mr. Eddleman's review at his request.

(e) If answer to (d) is affirmative, please identify each such study and give as complete a citation of it as you have (e.g. name, author(s), title, date, publisher, source, who commissioned it or sponsored it).

ANSWER: See Answer 8F1-1(d).

(f) Do applicants have anyone working for them (i) as an employee (ii) as a consultant (iii) in any other capacity, whom they believe is an expert in the health effects of coal-fired power plant emissions (such as given in Table S-3)?

ANSWER: The Applicants do not have on staff or acting as a consultant any person considered to be an expert in the health effects of coal-fired power plant emissions.

(g) Please identify each such person for which your answer to any part of (f) above is affirmative, giving name, address, phone, title, and professional qualifications if known

ANSWER: See Answer 8F1-1(f) above.

(h) Have Applicants participated in other proceedings in which the health effects of coal pollution were at issue, i.e. the health effects of emissions from coal-fired power plants?

ANSWER: In 1979 and 1982-83, the Applicant participated in hearings before the North Carolina Environmental Management Commission as related to particulate emissions from utility coal combustion sources.

(j) If answer to (h) is affirmative, please identify each such proceeding in which Applicants or any of them (E.g. CP&L) presented any (i) statement of position (ii) evidence (iii) submissions for the record (iv) expert testimony (v) expert witness, on the subject of health effects of coal pollution as defined in this contention, or as you define them.

ANSWER: See Answer 8F1-1(h) above.

(k) Please identify each document, statement, witness, item of evidence and testimony submitted in each proceeding identified in response to (j) above.

ANSWER: Mr. Eddleman was an intervenor in these proceedings and consequently should have received copies of all documents, statements, evidence, and expert testimony, made available as the hearing record.

INTERROGATORY NO. *8F1-2(a) Do Applicants believe 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 the NEPA cost-benefit balance for the Harris plant?

ANSWER: Applicants agree that the health effects of the coal-fired power plant emissions specified in Table S-3 have been considered by the NRC Staff in the Shearon Harris DES, and that Wells Eddleman's objection to this analysis has been admitted as a contention in this proceeding.

(b) Please give a full explanation of your answer to (a) above and fully cite any authority on which you rely for it.

ANSWER: Shearon Harris DES, Appendix C; Memorandum and Order of the Atomic Safety and Licensing Board in this proceeding dated August 18, 1983.

INTERROGATORY NO. *8F1-3(a) Has CP&L supplied any estimates of health effects of emissions from coal-fired power plants to NRC in the past?

ANSWER: No.

(b) Did CP&L ever do any comparison of the health effects of emissions from a coal-fired power plant and the Harris plant (i) for its own studies of what kind of plant to build when it was considering building the new power plant that eventually became Harris (ii) for its own use at any other time or in any connection (iii) for submission to the NRC or AEC in connection with the Harris construction permit (iv) for the use or for distribution to any other entity besides CP&L and the AEC/NRC?

ANSWER (b)(i) - (iv): No.

(c) Please identify all documents in which any estimates or comparisons inquired about in (a) or (b) above were made, identifying each fully and stating which part of (b) (or, if appropriate, was it (a)) that it was asked about in.

ANSWER: Not applicable.

(d) Is CP&L aware of (i) any EPRI studies on health effects of coal pollution? (ii) of any National Academy of Sciences studies on health effects of coal pollution (that term means emissions from coal-fired power plants, throughout this set of interrogatories) (iii) of any National Research Council studies on health effects of coal pollution (iv) of any EPA studies on health effects of coal pollution (v) of any studies by scientists on health effects of coal pollution (vi) of any studies by medical personnel or epidemiologists [sic] or statisticians on health effects of coal pollution?

ANSWER (d)(i): See Answer 8F1-1(c) above.

(ii): No.

(iii): No.

(iv): See Answer 8F1-1(d) above.

(v) - (vi): Not other than those, if any, contained in responses 8F1-1(c) and (d).

(e) For each part of (d) above for which your answer is affirmative, please identify each study in detail, and state whether CP&L possesses a copy. If you do not possess a copy do you have the right to obtain a copy?

ANSWER: See Answers 8F1-1(c) and (d).

(f) Is CP&L aware of any analysis of health effects of coal pollution by NRC Staff?

ANSWER: Not other than that contained in Shearon Harris DES, Appendix C.
Applicants possess a copy.

(g) If answer to (f) is affirmative, please identify each document containing such analysis which you are aware of and state whether you possess a copy.

ANSWER: See Answer 8F1-3(f).

This is the 23rd day of September, 1983.

Objections submitted by:



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THOMAS J. CRAWFORD
Principal Engineer
October 28, 1935

EDUCATION & TRAINING

1963 - B.S. Degree in Civil Engineering - Virginia Polytechnic Institute
1968 - M.S. Degree in Civil Engineering - West Virginia University

PROFESSIONAL SOCIETIES

EXPERIENCE

1954 - 1957 - Military - U.S. Marine Corps
January, 1964 - August, 1966 - Sanitary Engineer - Virginia Department of Health
September, 1966 - July, 1972 - Planning Engineer - Virginia Division of Water Resources
August, 1972 - September, 1973 - Planning Engineer - N.C. Office of Water & Air Resources
November, 1973 - Project Engineer - Environmental, Environmental & Technical Services Section, Special Services Department, CP&L, Raleigh, N.C.
August, 1974 - Principal Engineer - Technical Services, Licensing & Technological Services Section, Special Services Department, CP&L, Raleigh, N.C.
June, 1976 - Principal Engineer - Permits Unit, Licensing & Siting Section, Technical Services Department, CP&L, Raleigh, N.C.
December, 1979 - Principal Engineer - Permits Unit, Licensing & Permits Section, Technical Services Department, CP&L, Raleigh, N.C.
July, 1981 - Principal Engineer-Permits - Permits Unit, Licensing & Permits Section, Technical Services Department, CP&L, Raleigh, N.C.
August, 1983 - Principal Engineer, Permits Unit, Operations Training and Technical Services Department, CP&L, Raleigh, N.C.

9/21/83 mf

CALVIN MARTIN OGBURN
Project Scientist - Air Quality
May 24, 1945

EDUCATION & TRAINING

B.S. Degree - Math and Physical Science - Mayville State
College - Mayville, North Dakota - 1966

University of Oklahoma - Norman, Oklahoma - One Year -
Meteorology

University of North Carolina - Chapel Hill, North Carolina -
1 1/2 years in Air Pollution

EXPERIENCE

A. June 1964 - June 1966 - Chemistry Lab Assistant - Mayville
State College - Mayville, North Dakota.

1967 - 1972 - Captain - U.S. Air Force - Weather Officer.

August 1973 - September 1973 - 30-day appointment with
Environmental Protection Agency - Durham, North Carolina -
To develop a position paper on odors.

B. March 1974 - Junior Scientist - Carolina Power & Light
Company - Special Services Department - Licensing &
Technological Services Section - Raleigh, North Carolina.

April 1975 - Scientist I - Carolina Power & Light Company -
Special Services Department - Licensing & Technological
Services Section - Raleigh, North Carolina.

June 1976 - Scientist I - Carolina Power & Light Company -
Technical Services Department - Licensing & Siting
Section - Siting Unit - Raleigh, North Carolina.

April 1978 - Scientist - Carolina Power & Light Company -
Technical Services Department - Environmental Technology
Section - Terrestrial-Analytical Unit - Raleigh, North
Carolina.

October 1978 - Senior Scientist - Carolina Power & Light
Company - Technical Services Department - Environmental
Technology Section - Terrestrial-Analytical Unit - Raleigh,
North Carolina.

August 1979 - Senior Scientist - Carolina Power & Light
Company - Technical Services Department - Environmental
Technology Section - Harris E&E Center - New Hill, North
Carolina.

March 1982 - Project Scientist - Air Quality - Carolina
Power & Light Company - Technical Services Department -
Environmental Technology Section - Analytical-Materials
Unit - Harris E&E Center - New Hill, North Carolina.

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NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 83 SEP 28 P2:56

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AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)
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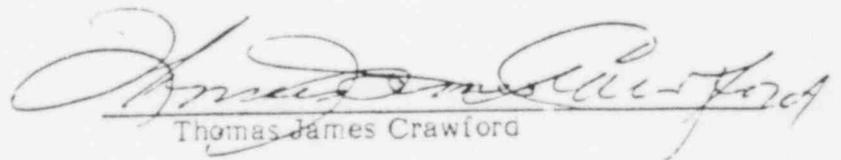
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-400 OL
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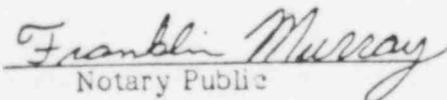
AFFIDAVIT OF THOMAS JAMES CRAWFORD

County of Wake)
)
State of North Carolina)

Thomas James Crawford, being duly sworn according to law, deposes and says that he is Principal Engineer - Permits Unit of Carolina Power & Light Company; that the answers to Interrogatories on Eddleman Contention 8F(1) contained in "Applicants' Response to Wells Eddleman's General Interrogatories and Interrogatories on Contention 8F(1)" 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.


Thomas James Crawford

Sworn to and subscribed before
me this 23rd day of September 1983.


Notary Public

My commission expires: 10/4/86

