

RELATED CORRESPONDENCE

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October 5, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	
AND NORTH CAROLINA EASTERN)	Docket No. 50-400 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant))	

APPLICANTS' EMERGENCY PLANNING INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO INTERVENOR WELLS EDDLEMAN (SECOND SET)

Pursuant to 10 C.F.R. §§ 2.74Cb and 2.741 and to the Atomic Safety and Licensing Board's "Final Set of Rulings on Admissibility of Offsite Emergency Planning Contentions, Ruling on Petition For Waiver of Need for Power Rule, and Notice of Upcoming Telephone Conference Call" (August 3, 1984), 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. Answers or objections to these interrogatories and responses or objections to the request for production of documents must be served no later than October 24, 1984.

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 Mr. Eddleman or any individual acting on his behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and Mr. Eddleman must produce immediately any additional documents he, or any individual acting on his behalf, obtains 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.

"Offsite emergency plans" refers to the "North Carolina Emergency Response Plan In Support of The Shearon Harris Nuclear Power Plant," Parts 1-5.

"Document(s)" means all writings and records of every type in the possession, control or custody of Mr. 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 they have ownership, possession or custody of the document or copy thereof, or have 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 each of your contentions which are 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 each 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 any contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) regarding which each such person is expected to testify.

(c). State the subject matter as 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 each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) 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 contentions which are 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 and/or the Federal Emergency Management Agency ("FEMA") Staff on each contention which is the subject of this set of interrogatories.

(b). Identify the contention(s) to which each document relates and the particular page citations applicable to each contention.

Interrogatories on Eddleman 57-C-7

57-C-7-1(a). For each of the hospitals listed in Part 1, pages 68 through 70 of the North Carolina Emergency Response Plan ("State Plan"), please state which ones, if any, you believe or contend are not prepared to treat severe radiation exposure.

(b). For each of those hospitals identified by you in Answer (a) above, please provide all facts which support your belief or contention that the hospital is not prepared to treat severe radiation exposure.

(c). For each of the hospitals listed in Part 1, pages 68 through 70 of the State Plan, which you have not identified in response to (a) above, please state how your failure to identify those hospitals as ones unprepared to treat severe radiation exposure is consistent with Contention 57-C-7.

57-C-7-2(a). Do you consider the "local and regional" hospitals to which you refer in the second sentence of Contention 57-C-7 to be in addition to the hospitals already listed in Part 1, pages 68 through 70 of the State Plan?

(b). If the answer to part (a) of this interrogatory is affirmative, list individually each of the local and regional hospitals outside of those referred to in Part 1, pages 68 through 70 which you contend Applicants should evaluate to determine its capability to provide medical services for those seriously injured by radiation.

(c). For each of the hospitals listed by you in response to (b) above, explain why Applicants should perform an evaluation of that hospital and why it is necessary to be included in the State Plan. Your answer should include a designation of which hospitals you consider "local" and which you consider "regional" and an explanation thereof.

57-C-7-3(a). Please describe in detail any and all changes which you believe must be made in the State Plan to meet the concern expressed in Eddleman 57-C-7.

(b). Please describe in detail the bases for your belief that such changes must be made.

57-C-7-4(a). Please describe in detail any and all actions or changes (other than those described in your response to Interrogatory 57-C-7-3(a)) which you believe are necessary to meet the concern expressed in Eddleman 57-C-7.

(b). Please describe in detail the bases for your belief that such actions or changes are necessary.

Interrogatories on Eddleman 213-a

213-a-1(a). For each of the offsite emergency response plan, state which specific section or sections you believe or contend require implementing procedures.

(b). For each of the sections of the offsite emergency response plan identified in your answer to (a) above, please state why you believe implementing procedures are needed.

(c). For each section of the offsite emergency response plan identified in (a), please summarize the substance of the implementing procedures you believe are needed. Your answer should include, but not be limited to, the consideration you gave to the amount of detail already in that section of the plan.

213-a-2(a). Please describe in detail any and all changes which you believe must be made in the offsite emergency response plan to meet the concern expressed in Eddleman 213-a.

(b). Please describe in detail the bases for your belief that such changes must be made.

213-a-3(a). Please describe in detail any and all actions or changes (other than those described in your response to Interrogatory 213-a-4(a)) which you believe are necessary to meet the concern expressed in Eddleman 213-a.

(b). Please describe in detail the bases for your belief that such actions or changes are necessary.

Interrogatories on Eddleman 240

240-1(a). Describe any and all changes you believe must be made in the offsite emergency plan to meet the concerns expressed in Eddleman Contention 240.

(b). Describe in detail the bases for your belief that such changes must be made.

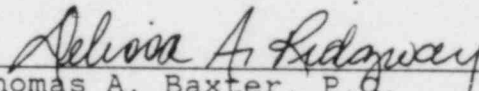
240-2(a). Describe any and all actions you believe must be taken, or changes you believe must be made (other than those identified in the answer to Interrogatory 240-1 above), to meet the concerns expressed in Eddleman Contention 240.

(b). Describe in detail the bases for your belief that such actions must be taken and such changes made.

Request For Production Of Documents

Applicants request that Intervenor 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.

Respectfully submitted,



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Dated: October 5, 1984

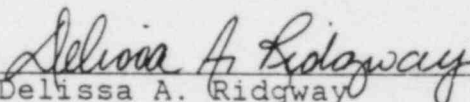
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Emergency Planning Interrogatories and Request For Production of Documents To Intervenor Wells Eddleman (Second Set)" were served this 5th day of October, 1984, by deposit in the U.S. mail, first class, postage prepaid, upon the parties listed on the attached Service List.


Delissa A. Ridgway

Dated: October 5, 1984

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