

950

RELATED CORRESPONDENCE

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.
WASHINGTON, D. C. 20036

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

RAPIFAX 100

(202) 822-1072

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

VIRGINIA OFFICE

1501 FARM CREDIT DRIVE
MCLEAN, VIRGINIA 22102

JOHN F. DEALY*
B. SCOTT CUSTER, JR.
RICHARD S. BEATTY
COUNSEL

JOHN M. THYBONE ET
GEORGE F. ALBRIGHT, JR.**
DAVID J. CYNAMON
JACK A. HORN
LOUISE A. MATHEWS
SETH H. HOOGASIAN
SHEILA MCC. HARVEY
DELISSA A. RIDGWAY
KATHLEEN D. O'BRIEN
DANIEL L. LAWRENCE
FREDERICK L. KLEIN
STEVEN P. PITLER
RICHARD J. PARRINO
ELLEN A. FREDL
ROBERT C. BOEHM
MARIE N. DOLAND
THOMAS C. HILL
SHANE E. BURNEY
DUANE O'NEAL
MICHAEL R. MADDEN
HANNAH E. M. LIEBERMAN
JUDITH A. SANDLER
ANDREW D. ELLIS
RICHARD A. SANDP
THOMAS E. CROCKER, JR.
VICKI R. HARDING
PETER J. FERRARA
HELEN TORELLI
MARTHA BOONE ROWAN**
KENNETH R. MILLER

JOHN H. MORE
STANLEIN A. WHITE
WENDELYN M. BARG
LESLIE K. SMITH
VIRGINIA S. RUTLEDGE
KATHERINE P. CHEER
TRAVIS T. BROWN, JR.
STEPHEN B. HEIMANN
SANDRA E. BRUSCA
SILEEN L. BROWNELL
PAMELA H. ANDERSON
ALEXANDER D. TOMASZCZUK
JEFFREY J. A. GIBBS
LAURENCE W. COHEN
DEREK W. LINDEN
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA J. FINKELSTEIN
DAVID R. SAHR
C. BOWDOIN TRAIN
JEFFREY W. KAMPELMAN
KENNETH A. GALLO
DAVID R. LEWIS
A. PATRICK LEIGHTON III*
KENNETH D. AUERBACH
ALAN D. WASSERMAN
DAVID K. RYAN
RICHARD K. A. BECKER
WILBERT WASHINGTON II
DOROTHEA W. DICKERMAN
* NOT ADMITTED IN D.C.
* ADMITTED IN VIRGINIA

RAMSAY D. POTTS, P.C.
STUART L. PITTMAN, P.C.
GEORGE F. TROWBRIDGE, P.C.
STEPHEN D. POTTS, P.C.
GERALD CHARNOFF, P.C.
PHILIP D. BOSTWICK, P.C.
R. TIMOTHY HANLON, P.C.
GEORGE M. ROGERS, JR., P.C.
FRED A. LITTLE, P.C.
JOHN B. RHINELANDER, P.C.
BRUCE W. CHURCHILL, P.C.
LESLIE A. NICHOLSON, JR., P.C.
MARTIN D. KRALL, P.C.
JAY E. SILBERG, P.C.
BARBARA M. ROSSOTTI, P.C.
GEORGE V. ALLEN, JR., P.C.*
FRED DRASNER, P.C.
R. KENLY WEBSTER, P.C.
NATHANIEL B. BREED, JR., P.C.
MARK AUGENBLICK, P.C.
ERNEST L. BLAKE, JR., P.C.
CARLETON S. JONES, P.C.
THOMAS A. BAXTER, P.C.
SHELDON J. WEISEL, P.C.
J. PATRICK HICKEY, P.C.
J. THOMAS LENHART, P.C.
STEVEN L. MELTZER, P.C.
DEAN D. AULICK, P.C.
JOHN ENGEL, P.C.*
C. THOMAS HICKS III, P.C.*

CHARLES J. TEMKIN, P.C.
STEPHEN B. HUTTLER, P.C.
WINTHROP N. BROWN, P.C.
JAMES B. HAMLIN, P.C.
RANDAL B. KELL, P.C.
ROBERT E. ZAHLER, P.C.
ROBERT B. ROBBINS, P.C.
STEVEN M. LUCAS, P.C.
DAVID M. RUBENSTEIN, P.C.
MATIAS F. TRAVIESO-DIAZ, P.C.
VICTORIA J. PERKINS, P.C.
JOHN H. O'NEILL, JR., P.C.
JAY A. EPSTEIN, P.C.
JEFFERY L. YABLON, P.C.
JACK MCKAY, P.C.*
ELISABETH M. PENDLETON
HARRY H. GLASSPIEGEL
THOMAS H. MCCORMICK
WILLIAM P. BARR*
CHARLES H. MONTANGE
JEAN M. GALLOWAY*
JOHN L. CARR, JR.
PHILIP J. HARVEY
ROBERT M. GORDON
BONNIE S. GOTTLIEB
HOWARD H. SHAFFERMAN
DEBORAH B. BAUSER
SCOTT A. ANENBERG
CAMPBELL KILLEFER
PAUL M. THOMAS

WRITER'S DIRECT DIAL NUMBER

August 9, 1984

(202) 822-1090

James L. Kelley, Esquire
Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Carolina Power & Light Company and North
Carolina Eastern Municipal Power Agency
(Shearon Harris Nuclear Power Plant)
Docket No. 50-400 OL

Administrative Judges Kelley, Bright and Carpenter:

Pursuant to the schedule established in the Board's Memorandum and Order (Reflecting Decisions Made Following Second Prehearing Conference) (March 10, 1983), Applicants are filing today the testimony and exhibits which will be offered into evidence at the hearings on safety contentions to begin on September 5 and October 10, 1984.

8408140014 840809
PDR ADDOCK 05000400
T PDR

DS03

James L. Kelley, Esquire
Mr. Glenn O. Bright
Dr. James H. Carpenter
August 9, 1984
Page 2

Joint Contention I

Testimony and exhibits are being filed under separate cover from Carolina Power & Light Company.

Joint Contention VII(4)

Enclosed is "Applicants' Testimony of Michael J. Hitchler in Response to Joint Intervenors' Contention VII(4) (Steam Generator Tube Rupture Analysis)."

Eddleman Contention 41

Enclosed is "Applicants' Testimony of James F. Nevill, Alexander G. Fuller, David R. Timberlake and Kumar V. Haté in Response to Eddleman Contention 41 (Pipe Hanger Welding)."

Eddleman Contention 65

Enclosed are "Applicants' Testimony of George A. Kanakaris, Roland M. Parsons and Larry F. Garner in Response to Eddleman Contention 65 (Concrete Containment Structure)" and, as an exhibit, FSAR Section 3.8.1, "Concrete Containment."

Applicants will also offer into evidence as exhibits the concrete pour packages which have previously been served upon the Board and all parties as Attachments 2 through 14 of "Applicants' Response to Eddleman Proposed Contentions 65-A and 65-B," dated June 29, 1984.

Eddleman Contention 116

Enclosed are: "Applicants' Testimony of Margareta A. Serbanescu in Response to Eddleman Contention 116 (Fire Protection)"; "Applicants' Testimony of David B. Waters in Response to Eddleman Contention 116 (Fire Protection)"; and, as an exhibit, FSAR Section 9.5 and Appendix 9.5A, "Fire Protection System."

Applicants will also offer into evidence as an exhibit a summary of the Safe Shutdown Analysis in Case of Fire for the Shearon Harris Nuclear Power Plant. Copies of the two documents which will constitute this exhibit were previously served upon the Board and parties by cover of letter serial NLS-84-090 to H. R. Denton, NRC, from M. A. McDuffie, CP&L, dated February 24, 1984, and letter serial NLS-84-245 to H. R. Denton, NRC, from A. B. Cutter, CP&L, dated June 12, 1984.

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

James L. Kelley, Esquire
Mr. Glenn O. Bright
Dr. James H. Carpenter
August 9, 1984
Page 3

Pursuant to the Board's Memorandum and Order of July 24, 1984, testimony and exhibits in response to Eddleman Contention 9 (environmental qualification of electrical equipment) is due on August 31, 1984.

Respectfully submitted,

Thomas A. Baxter

Thomas A. Baxter
Counsel for Applicants

TAB:jah
Enclosure

cc: Charles A. Barth, Esquire
Janice E. Moore, Esquire
Mr. Daniel F. Read
John D. Runkle, Esquire
M. Travis Payne, Esquire
Dr. Richard D. Wilson
Mr. Wells Eddleman
Dr. Linda W. Little
Bradley W. Jones, Esquire
Stephen F. Crockett, Esquire
Mr. Robert P. Gruber
Docketing and Service Section