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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

DOCKETED
USNRC
8-31-84
'84 SEP -4 P3:58

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
(Shearon Harris Nuclear Power Plant,
Unit 1)

Docket : 50-400 OL

Wells Eddleman's General Interrogatories
to Applicants Carolina Power & Light et al.

(11th Set)

6-14-84 + 8-03-84

Under 10 CFR 2.740, 2.741 and the Board's 9-22-82 Memorandum(s) and Order(s), Wells Eddleman requests Applicants to answer separately and fully in writing, under oath or affirmation, each of the following interrogatories, and to produce a permit inspection and copying of the original or best copy of all documents identified in response to interrogatories as set forth below.

AND NC Dept of CCPS + county emergency planners

These interrogatories are intended to be continuing in nature, and I request each answer to be promptly supplemented or amended as appropriate under 10 CFR 2.740(e), should CP&L, NCEMPA, any other or any contractor or consultant to any, some or all of those, Applicant, or any employee of any or some or all of them, or any individual acting on behalf of any or some of all of them, obtain or create any new or differing information responsive to these general interrogatories. The request for production of documents is also continuing and requests Applicants to produce promptly if not immediately any additional documents the Applicants and others acting on their behalf or employed by them, as listed in the previous

state of NC, state or county emergency response planner or PERSONNE

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sentence, obtain which are responsive to the request(s) for production of documents below.

Where identification of a document is requested, please briefly describe the document (e.g. book, notebook, letter, memo, report, notes, transcript, minutes, test data, log, etc.) and provide the following information as applicable: document name, title, number, author(s), date of writing or of publication or both, addressee, date approved, by whom approved, and the name and address of the persons having normal custody of the document, and name and address of any person other than the preceding having actual possession of the document. When identifying documents in response to these interrogatories and requests, please state the portion or portions of the document (e.g. sections, chapters, pages, lines) upon which Applicants rely or which Applicants swear or affirm is/are responsive to the applicable interrogatory or request.

DEFINITIONS herein:

"Harris", "Harris Plant", "SHNPP", or "plant" where not specified otherwise, all mean the Shearon Harris Nuclear Power Plant.

"Applicants" means all of the persons, employees, consultants, contractors and corporations as listed in the first sentence of the second paragraph on page 1 of this document, above.

"FSAR" means the Harris Final Safety Analysis Report.

"ER" means the Harris Environmental Report.

"Document(s)" means all writings and records of every type, including electronic and computer records, in the possession, control or custody of Applicants or any individual(s) acting on Applicants' behalf, including, but not limited to: reports, books, memoranda, correspondence, notes, minutes, pamphlets, leaflets, magazines, articles, surveys, maps, bulletins, photographs, speeches, transcripts,

voice recordings, computer printouts, information stored in computers or computer peripheral devices such as disks, drums, etc., voice recordings, microfilm, microfiche and all other writings or recordings of any kind(s); and copies of any of the preceding even though the original(s) are not in the possession of Applicants or in their custody or control. Document(s) shall be deemed to be within the control of Applicants or ^{any} individual(s) acting on their behalf if they have ownership, possession, or custody of the document(s) or a copy thereof, or have the right to secure the document(s) or a copy thereof, from any person or public or private entity having physical possession thereof.

Each definition given above applies within all other definitions above.

GENERAL INTERROGATORIES

G1 (a) Which contentions of Wells Eddleman do Applicants agree are now admitted in this proceeding, NPC Dockets 50-400/401 O.L.?

(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:

(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.

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

(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.

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

(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.

(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.

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.

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

(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.

(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.

(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.

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.

(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.

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 ~~intend~~^{form intent} to use such document in cross-examination.

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

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.

(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.

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, if any, upon which Applicants rely of the document,
 - (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 ^{or State of NC or any emergency planner} 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.

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.

(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.

(c) Please identify which of the documents identified in response to (b) above 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.

and/or specific interrogatories below,
G-10(a) Where the above general interrogatories, 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.

(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.

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.

G-12(a) In your previous ^{present} answers where you have not identified documents, (i) have all relevant documents been produced in lieu of stating identification of each such document? (ii) do you rely on the entire document, since you have not identified parts or page numbers? (iii) if there are any particular parts or pages of each document produced, which you believe are responsive to an interrogatory or portion thereof, please identify each set of parts or pages in each document, together with the interrogatory or portion thereof (or interrogatories and/or portions thereof) to which it is responsive. (iv) where no documents are identified and identification of documents has been requested, are you saying ^{such} no documents exist? Or that no such documents are in your possession?

(b) In your present answers, are you actually identifying documents where identification of documents is requested? (c) If not, how are you going to provide identification of documents? Will that identification include statements of relevant pages or parts?

Specific Interrogatories on Eddleman 240

240-1(a) What agency of Chatham County government is responsible for the decontamination of evacuees at the Chatham County shelters? (b) if different agencies have responsibility for decontamination of evacuees at different shelters, please state which agency is responsible for which shelter, and whether the county agencies provide decontamination for evacuees (or will be prepared to provide it) at all Chatham County shelters. (c) If anyone other than an agency of Chatham County government is responsible (or to be responsible) for decontamination of evacuees at any shelter in Chatham County, please list the responsible persons or agencies for each such shelter. (d) For each agency or person who has responsibility for decontaminating evacuees at any shelter in Chatham County, what is the capability of each such agency or person to carry out such decontamination? Please address (i) establishment of radiological response teams (ii) training of these teams (iii) directing of these teams, fully in your answer, and fully and completely describe the capabilities of each such team to carry out decontamination of evacuees from a nuclear accident at Shearon Harris.

240-2(a) Which organization(s) are responsible for providing support for ~~decontamination~~ decontamination of evacuees in Chatham County? (b) Identify each shelter for which each support agency, identified in response to (a) above, will or can provide support. (c) For each such agency or shelter, what are the capabilities to provide support for decontamination of ~~evacuees~~ evacuees? (d) Please identify all documents concerning responsibility for providing support for decontamination of evacuees in Chatham County, who will provide this support, ~~and~~ the capabilities of such support agencies, or the shelters where each such agency will (or is intended to) provide support for decontamination of ~~evacuees~~ evacuees.

240-3(a) Please identify all documents concerning the responsible agencies or agency of Chatham County which will provide decontamination for evacuees from a nuclear accident at Shearon Harris, including (i) which shelters each such agency has primary or backup responsibility for (specify the type of responsibility, i.e. primary, backup); (ii) the ~~capabilities~~ capabilities of each such agency for decontamination (iii) the establishment, training or direction of Radiological Response Teams in Chatham County or to be used in Chatham County in the event of a nuclear accident at Shearon Harris; (iv) any other agency's responsibility or capabilities for providing decontamination for evacuees at shelters in Chatham County, which information is used or relied upon by emergency planners of the State of NC or Chatham County; (v) any agency or person who is expected to provide decontamination for evacuees at any shelter (x) in Chatham County in the event of a nuclear accident at Shearon Harris, which identifies that agency or person, or discusses or describes or evaluates that person or agency's capabilities for providing decontamination.

Specific Interrogatories on 213-a:

213-A-1(a) Does the Harris offsite emergency response plan now conform to evaluation criterion II.P.7 of NUREG-0654? (b) If so, how? (c) If not, why not? (d) What additional information is required to bring the plan for the Harris plant into compliance with NUREG-0654 evaluation criterion II.P.7? (e) When is this information now scheduled to be completely incorporated into the plan? When will all of the information required to comply with criterion II.P.7 be in the plan?

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213-A-1 continued

(f) when will FEMA begin review of this information submitted to ensure compliance with NUREG-0654 criterion II.P.7 for the Shearon Harris off-site emergency response plan? When is that review scheduled to be completed?

(g) Please identify all documents concerning (i) compliance or noncompliance of the Harris off-site Emergency Response Plan (ERP) with NUREG-0654 criterion II.P.7; (ii) information required to bring the Harris ERP into compliance with this criterion; (iii) actions required to bring the Harris offsite ERP into compliance with this criterion; (iv) comments by FEMA or any other emergency planning agency, or any person (including consultants and staff of emergency planning organizations) concerning the compliance (or lack of compliance) of the Harris offsite ERP with NUREG-0654 evaluation criterion II.P.7; (v) drafts or information to be added to the Harris ERP to meet evaluation criterion II.P.7; (vi) comments on those drafts; (vii) evaluation of the Harris ERP (offsite) vs. NUREG-0654 criterion II.P.7 by FEMA or anyone else.

213-A-2(a) Do you believe that all requirements of evaluation criterion II.P.7 of NUREG-0654 are met by the present form of the Harris offsite emergency response plan? (b) Please give all reasons for your answer to (a) including cites to every ~~one~~ specific part of the plan which you believe detail or contain implementing procedures, all parts of the plan which do not in your opinion contain sufficient implementing procedures, and all reasons why you believe the plan in its present form does, or does not, fully comply with criterion II.P.7 of NUREG-0654. Please identify all documents containing information used in forming your belief or making your answer to either (a) above or above parts of (b).

(c) If you don't know whether the Harris offsite ERP does or does not fully comply with evaluation criterion II.P.7 of NUREG-0654, do you plan or are you now doing anything to find out if it does? If so, what is to be done, and when is it to be completed? Please identify all documents concerning your review of the Harris offsite ERP for NUREG-0654 criterion II.P.7 compliance, including documents containing any results of such review(s) or comments on such reviews or drafts thereof.

(d) What implementing procedures are required for an offsite emergency response plan ~~in~~ in your opinion?

(e) Is there anything about the present form of the Harris offsite ERP that (i) does (ii) does not, comply with evaluation criterion II.P.7 of NUREG-0654? If so, what does comply, and what does not? Please provide all reasons for your answer(s) including any ~~and~~ documents or rules or review standards you used in making your answer or any review or ~~of~~ analysis underlying your answer(s) or any of your answers.

213-A-3(a) Where are the implementing procedures in the Harris offsite emergency response plan? Please list each one and explain why, in your view, it is an adequate (or inadequate) implementing procedure for compliance with NUREG-0654 criterion II.P.7.

Interrogatories on 57-C-7

57-C-7-1(a) Do you know if any hospitals (i) listed on section V.B.3 of the State (offsite) Harris emergency response plan are now prepared to treat severe radiation exposure per se? (ii) not listed in the Harris ERP section V.B.3, but (ii-a) local (ii-b) regional hospitals ~~hmm~~ around the Harris plant, are now prepared to treat severe radiation exposure cases?

(b) If you answer to any part(s) of (a) or (b) above, or to (a) or (b) above, is affirmative, identify the ~~x~~ hospital(s) and give all reasons for your answer. (c) Please state what types or levels of severe radiation exposure (e.g. dose up to 400 rem) each hospital is prepared to treat, i.e. what are the severe radiation injuries or exposure levels each is prepared to treat. (d) please identify all documents concerning the ability of each such hospital to treat severe radiation injuries or exposure.

57-C-7-x2(a) Does the Harris offsite ERP presently list (i) local hospitals with the necessary capabilities to provide medical services for those seriously injured by radiation alone? (ii) regional hospitals with the necessary capabilities to provide medical services for those seriously injured by radiation alone? (b) what capabilities do you maintain each such hospital has for providing medical services to persons seriously injured by radiation? How do you know each has those capabilities? Have you inspected each hospital to evaluate the existence of those capabilities? How do the capabilities of each such hospital meet or exceed the "necessary capabilities" required to provide medical services for those seriously injured by radiation alone? (c) what are the necessary capabilities required to provide medical services for persons seriously injured by radiation, for (i) local hospitals (ii) regional hospitals, around the Harris nuclear plant? How do you know these capabilities are necessary? How do you know that other capabilities are not necessary for providing medical services to persons seriously injured by radiation? (d) If you or your attorney(s) say that knowledge or inspection or evaluation of the capabilities of hospitals to provide medical services for persons seriously injured by radiation are (i) irrelevant (ii) objectionable (iii) outside the scope of this contention, please ~~x~~ explain fully how you know that any hospital has the "necessary capabilities to provide medical services for those seriously injured by radiation alone~~x~~"?

(e) Please identify all documents concerning each matter inquired about in each part of (a) thru (d) above.

57-C-3(a) Please identify all documents concerning the question of whether the ability to treat severe radiation exposure per se is required by (i) any FEMA guidance (ii) any NRC regulation (iii) any NRC rule (iv) any applicable law or requirement, including the ATOMIC Energy Act.

PRODUCTION OF DOCUMENTS

Wells Eddleman hereby requests that the original or best copy of each document identified in response to the above interrogatories be produced for inspection and copying at a mutually agreeable time and place.

Wells Eddleman
 Wells Eddleman
 8-31-84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.)
Shearon Harris Nuclear Power Plant, Unit 1)

Docket 50-400
O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of W.E. Interrogatories to Applicants/NC
Emergency Planners on contentions 240, 213-a and 57-C-7, and of
W.E. Interrogatories to NRC Staff/FEMA Staff on the same contentions

HAVE been served this 31 day of August 1984, by deposit in
the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with
an asterisk, for whom service was accomplished by omission from
service per oral order of March 1983

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