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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 SEP 21 P3:02

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BRANCHBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Dockets 50-400 OL
50-401 OL

RESPONSE TO APPLICANTS' "EMERGENCY PLANNING
INTERROGATORIES TO INTERVENOR CHANGE"

On 9 August 1984 Applicants served the above-titled interrogatoires and request for production of documents. By virute of various extensions the deadline for responding is 18 Septmber 1984. Following are responses of intervenor CHANGE.

General Interrogatories

1(a). Daniel F. Read, P.O. Box 2151, Raleigh, NC 27602;
Employer: North Carolina Court of Appeals, Raleigh, NC.

1(b). All facts identified herein.

1(c). See responses to specific interrogatories.

2(a). None.

2(b). See Response 2(a).

3(a). Unknown at this time.

3(b). See Response 3(a).

3(c). See Response 3(a).

4(a). Emergency Response Plan in Support of the Shearon Harris Nuclear Power Plant (1984) (hereinafter "ERP").

4(b). All contentions.

4(c). All allegations.

5(a). See responses to specific interrogatories.

5(b). See Response 5(a).

6(a). None.

6(b). Not applicable.

7(a). Unknown at this time.

7(b). See Response 7(a).

Specific Interrogatories

17-1(a). Unknown at the present time.

17-1(b). See Response 17-1(a).

17-2(a). Unknown at the present time.

17-2(b). Unknown at the present time.

17-2(c). Unknown at the present time.

17-2(d). Unknown at the present time.

17-2(e). Not applicable.

17-3. Unknown if there are any means other than those used for notifying the population in general.

17-4(a). Unknown at the present time; believed, based on general personal knowledge, that the problem does not lie with the brochure but with (1) reliance on voluntary response and (2) reliance on postal system for 100% coverage.

17-4(b). See reasons stated in Response 17-4(a).

17-4(c). At the present time, general personal knowledge.

17-5. Unknown at the present time.

17-6. Unknown at the present time.

25-1 et seq. Contention 25 is withdrawn. See "Withdrawal of Contentions," filed simultaneously with these responses.

29-1(a). Yes.

29-1(b). No.

29-1(c). General knowledge of human nature and family relationships indicate to me that parents would seek to be reunited with their children as soon as possible in emergency situation. The various allegations of corporate mismanagement against CP&L, and the very nature of its position as a large utility corporation, indicate to me that people will be likely to mistrust CP&L and/or government warnings via CP&L and that they would try to pick up their children in the event of an emergency.

29-2. Not quantified at the present time.

29-3(a). Confusion and crowding at schools, resulting in delay of evacuation.

29-3(b). General personal knowledge of school pick-up and drop-off situations. See also Response 29-1(c).

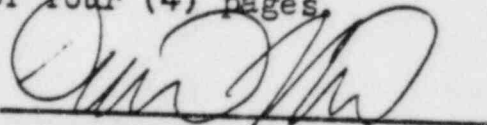
29-4. Not developed at the present time.

29-5. Not developed at the present time.

30-1(a). et seq. Contention 30 is withdrawn. See Response 25-1.

31-1(a). et seq. Contention 31 is withdrawn. See Response 25-1.

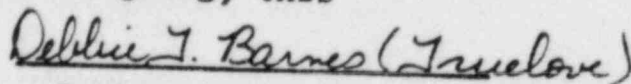
I certify and affirm that I have prepared the foregoing responses, and that they are true and correct to the best of my knowledge. They consist of four (4) pages.



Daniel F. Read
P.O. Box 2151
Raleigh, NC 27602

STATE OF NORTH CAROLINA
COUNTY OF WAKE

I, Debbie T. Barnes (Truelove), notary public for the State and County aforesaid, do hereby certify that Daniel F. Read did appear before me and execute the foregoing, this 18th day September, 1984.



Debbie T. Barnes (Truelove)
Notary Public

My Commission Expires 2/3/86

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et al., Shearon Harris Nuclear Plant, Units 1 & 2 } 50-400,
50-401

CERTIFICATE OF SERVICE

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DOCKETING & SERVICE
BRANCH

to Applicants' I hereby certify that copies of "Withdrawal of Contentions" and "Response
-ERP Interrogatories to CHANCE" were served this 18 day
of Sept., 1984, by deposit in the U.S. Mail, first-
class postage prepaid, upon all parties whose names appear
below, except those whose names are marked with an asterisk,
for whom service was accomplished by hand delivery.

James L. Kelley, Esq./~~Mr. Glenn O. Bright/Dr. James Carpenter~~
Atomic Safety & Licensing Board (one each)
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
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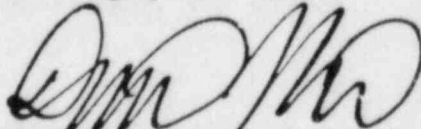
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