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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket No. 50-400 OL

APPLICANTS' RESPONSE TO WELLS EDDLEMAN'S  
GENERAL INTERROGATORIES TO APPLICANTS (11th Set)

GENERAL INTERROGATORIES

INTERROGATORY NO. GI(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 to this proceeding are set forth in various memoranda and orders issued by the Atomic Safety and Licensing Board, all of which are available to Mr. Eddleman.

INTERROGATORY NO. GI(b). [F]or 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:

ANSWER: The answers to General Interrogatories herein are restricted to Eddleman Contentions 57-C-7, 213-A and 240.

INTERROGATORY NO. GI(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 Contentions 57-C-7,

8410030579 841001  
PDR ADOCK 05000400  
G PDR

D 502

213-A and 240 and indicates the particular interrogatory answers for which such person provided information:

<u>PERSON</u>	<u>INTERROGATORY NO.</u>
Mark Scott Emergency Management Coordinator Chatham County Emergency Management Agency Pittsboro, N. C. 27312	240-1, 240-2, 240-3
Robert G. Black, Jr. Carolina Power & Light Company P. O. Box 1551 Raleigh, N. C. 27602	57-C-7-1, 57-C-7-2, 57-C-7-3

INTERROGATORY NO. G1(d). [P]lease identify all facts concerning which each such person identified in response to G1(c)(1) above has first-hand knowledge.

ANSWER: See answer to Interrogatory No. G1(c).

INTERROGATORY NO. G1(e). [P]lease 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 facts or documents relied upon by those individuals identified above are indicated within each response to the specific interrogatories on Contentions 57-C-7, 213-A and 240.

INTERROGATORY NO. G1(f). Please identify any other document(s) used or relied upon by Applicants in responding to the interrogatory.

ANSWER: See Answer G1(e).

INTERROGATORY NO. G1(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 Contentions 57-C-7, 213-A, and 240.

INTERROGATORY NO. G1(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 regarding these Eddleman contentions. When and if such witnesses are identified, Applicants will supplement this response in a timely manner.

INTERROGATORY NO. G2(b). Please identify each contention regarding which each such person is expected to testify.

ANSWER: See Answer G2(a).

INTERROGATORY NO. G2(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).

INTERROGATORY NO. G2(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).

INTERROGATORY NO. G2(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). [P]lease 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 other such sources of information, if any, within the answers to the specific interrogatories set forth herein.

INTERROGATORY NO. G3(b). [P]lease 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) or 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). [P]lease 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.

INTERROGATORY NO. G4(b). [P]lease identify any undocumented information Applicants intend to use in cross-examination of each such witness for me.

ANSWER: See Answer G4(a).

INTERROGATORY NO. G5(a). [F]or 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 Contentions 57-C-7, 213-A and 240.

INTERROGATORY NO. G5(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. G6(a). [F]or 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 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: 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 have 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 whom he is particularly interested in determining this information.

INTERROGATORY NO. G7(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 Contentions 57-C-7, 213-A or 240.

INTERROGATORY NO. G7(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 G7(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.

INTERROGATORY NO. G7(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. G10(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 G10(a)(ii) is other than affirmative, please state all reasons for your answer. (iv) If your answer to G10(a)(i) above is other than affirmative, please state all reasons for your answer.

ANSWER: (i) Yes.

(ii) Yes.

(iii) Not applicable.

(iv) Not applicable.

INTERROGATORY NO. G10(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: (i) Yes.

(ii) See Answers G1(e), (f) and (g) and G10(a)(i) above.

(iii) See Attachment A attached hereto and the statement of professional qualifications for Robert G. Black, Jr. transmitted by Applicants' letter of September 12, 1984.

(iv) Not applicable.

(v) Not applicable.

(vi) Not applicable.

INTERROGATORY NO. G11. 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.

INTERROGATORY NO. 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 [sic] thereof, please identify each set of parts or pages in each document, together with the interrogatory or portion [sic] thereof (or interrogatories and/or portion thereof) to which it is responsive. (iv) where no documents are identified and identification of documents has been requested, are you saying no such 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?

each case where Applicants rely on specific portions of a document and can identify those portions more readily than could someone who has no familiarity with the document. Where identification of documents has been requested, and none are identified, Applicants know of no responsive documents.

SPECIFIC INTERROGATORIES ON EDDLEMAN 240

INTERROGATORY NO. 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.

ANSWER: 240-1(a) Chatham County fire departments are responsible for decontamination of persons at shelters.

(b) The shelter which is opened will determine which fire department will be used for decontamination. For instance, if Northwood High School is opened, the North Chatham Fire Department will be the decontamination team. If Jordan Matthews High School is the shelter, Siler City Fire Department will be the decontamination team. If Chatham Central High School is used, Bonlee Fire Department will do the decontamination.

(c) See responses (a) and (b) above.

(d)

(i) Radiological response teams are comprised of members of fire departments.



- (i) Radiological response teams are comprised of members of fire departments.
- (ii) Representatives of county fire departments and rescue units have completed the Radiological Monitoring Course given by North Carolina Division of Emergency Management.
- (iii) Teams are directed by the usual chain of command; that is, the Fire Chief/Captain is the overall supervisor of decontamination activities. A listing of equipment for each fire department is contained in the "Chatham County Department of Emergency Operations Resources Handbook." Additional assistance in decontamination will be available from the North Carolina Department of Human Resources, Radiation Protection Section (RPS) and from Carolina Power & Light Company. See Response 240-2 below.

INTERROGATORY NO. 240-2(a): Which organization(s) are responsible for providing support for 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? (d) Please identify all documents concerning responsibility for providing support for decontamination of evacuees in Chatham County, who will provide this support, the capabilities of such support agencies, or the shelters where each such agency will (or is intended to) provide support for decontamination of evacuees.

ANSWER: 240-2(a) Chatham County fire departments and rescue squads will be responsible for providing support for decontamination of evacuees in Chatham County. In addition, the North Carolina Department of Human Resources, Radiation Protection Section (RPS), is responsible for providing radiological technical directions and

protective equipment to other agencies, as needed, as noted in the Emergency Response Plan, Part 1, page 15.

(b) The shelter which is opened will determine which fire department or rescue squad will be used for support for decontamination activities. For example, if Northwood High School is opened, the East Chatham Rescue Squad will be used for support. If Jordan Matthews High School is opened, Chatham County Rescue Squad will support; or if Chatham Central High School is opened, the Bonlee Fire Department will support. RPS can be contacted to provide technical support. Carolina Power & Light Company will also provide technical support as needed if requested.

(c) Fire department and rescue squad personnel who have completed the Radiation Monitoring Course provided by DEM. Capabilities of these agencies are as outlined in the response to 240-1(d). Radiation specialists and health physicists from RPS and CP&L will be available.

(d) Emergency Response Plan, especially Part 2; listing of "Chatham County Decontamination Points."

INTERROGATORY NO. 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) 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(s) 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.

ANSWER: Emergency Response Plan, especially part 2, page 35; "Chatham County Department of Emergency Operation Resources Handbook."

SPECIFIC INTERROGATORIES ON 213(a)

INTERROGATORY NO. 213-A-1(a): Does the Harris offsite emergency response plan now conform to evaluation criterion II.P.7 or 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? (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 [sic] 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.

ANSWER: To be provided by Supplemental Answer.

INTERROGATORY NO. 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 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 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 documents or rules or review standards you used in making your answer or any review or analysis underlying your answer(s) or any of your answers.

ANSWER: To be provided by Supplemental Answer.

INTERROGATORY NO. 213-A-3(a): Where are the implementin [sic] 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.

ANSWER: To be provided by Supplemental Answer.

INTERROGATORIES ON 57-C-7

INTERROGATORY NO. 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 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 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 hospital to treat severe radiation injuries or exposure.

ANSWER 1(a)(i) - (ii-b): Applicants have not as of this date performed an evaluation of the capability of each hospital listed at Part 1, pages 68-70 of the North Carolina Emergency Response Plan, nor of other "local" or "regional" hospitals around the Harris Plant to treat severe radiation exposure per se. Applicants are not aware of any statute, regulation, guidance, or case law which would require such an evaluation to be made.

(b) Not applicable.

(c) See Answer (a)(i)-(ii-b).

(d) Not applicable.

INTERROGATORY NO. 57-C-7-2(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 explain fully how you know that any hospital has the "necessary capabilities to provide medical services for those seriously injured by radiation alone"? (e) Please identify all documents concerning each matter inquired about in each part of (a) thru (d) above.

ANSWER 2(a)(i) and (ii): Applicants have not as of this date performed an evaluation of the capability of each hospital listed at Part I, pages 68-70 of the North Carolina Emergency Response Plan to provide medical services for those seriously injured by radiation alone. Applicants are not aware of any statute, regulation, guidance or case law which would require such an evaluation to be made. If such an evaluation is performed, Applicants will supplement these responses in a timely manner.

(b) Not applicable. See Answer 2(a)(i) and (ii) above.

(c) Not applicable.

(d) Neither Applicants nor their attorneys at this date say that "knowledge or inspection or evaluation of the capabilities of hospitals to provide medical services for persons seriously injured by radiation are irrelevant, objectionable, or outside the scope of the contention." (Applicants do not by this answer, however, intend to waive their right to object on such grounds.) Therefore, the interrogatory is not applicable.

(e) Not applicable.

INTERROGATORY NO. 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.

ANSWER 3(a): Documents which relate to the question include: 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, dated August 3, 1984; Southern California Edison (San Onofre Nuclear Generating

Station, Units 2 and 3), CLI-83-10, 17 NRC 528 (1983); NUREG-0654/FEMA-PEP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness Support of Nuclear Power Plants.

This 1st day of October, 1984.

Submitted by:

*Dale E. Hollar*

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CHATHAM COUNTY  
Office of Emergency  
Services

Attachment A

Phones - 663-2911  
542-2911

MARK SCOTT  
FIRE MARSHAL

MARK SCOTT 34 yrs old,,,,,married,,,,,,2 children

14 years as diesel mechanic

15 years as member of vol. fire and rescue dept.

10 yr. as chief of above dept.

18 months as fire marshal and Emergency Mgt. Coordinator

E.M.T. certification 1973

Law enforcement certification thru N.C. JUSTICE ACADEMY

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION **1984** OCT -3 A10:58

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING & SERVICE  
BRANCH

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

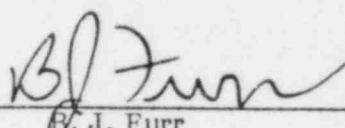
Docket No. 50-400 OL

AFFIDAVIT OF B. J. FURR

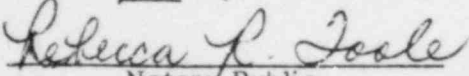
County of Wake )  
)  
State of North Carolina )

B. J. Furr, being duly sworn according to law, deposes and says that he is Vice President - Operations Training and Technical Services of Carolina Power & Light Company; that the answers to Interrogatories on Eddleman Contentions 57-C-7, 213-A and 240 contained in "Applicants' Response to Wells Eddleman's General Interrogatories to Applicants (Eleventh Set)" 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, and employees and agents of the State of North Carolina.

This 1<sup>st</sup> day of October, 1984.

  
\_\_\_\_\_  
B. J. Furr

Sworn to and subscribed before me this 1<sup>st</sup> day October 1984.

  
\_\_\_\_\_  
Notary Public

My commission expires: My Commission Expires 6-8-86



DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'84 OCT -3 A10:59

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

AFFIDAVIT OF B. J. FURR

County of Wake	)
	)
State of North Carolina	)

B. J. Furr, being duly sworn according to law, deposes and says that he is Vice President - Operations Training and Technical Services of Carolina Power & Light Company; that the answers to Interrogatories on Eddleman Contentions 30, 57-C-3, 57-C-10, 57-C-13, 213, 215, and 224 contained in "Applicants' Response to Wells Eddleman's General Interrogatories to Applicants (Tenth Set), with Applicants' answer to Interrogatory 57-C-3-3m(b) supplemented as indicated in "Applicants' Supplemental Response to Eddleman Interrogatory No. 57-C-3-3m(b)", 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, and employees and agents of the State of North Carolina.

This the 21 day of September, 1984.

B. J. Furr  
B. J. Furr

Sworn to and subscribed before  
me this 21 day of September, 1984.

Rebecca R. Toole  
Notary Public

My commission expires:                       
My Commission Expires 6-2-85

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION <sup>1984</sup> OCT -3 110:59

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN )  
MUNICIPAL POWER AGENCY )

(Shearon Harris Nuclear Power Plant, )  
Unit 1) )

Docket No. 50-400 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Wells Eddleman's General Interrogatories to Applicants (Eleventh Set)" and the Affidavit of B. J. Furr, which was unavailable at the time of filing "Applicants' Response to Wells Eddleman's General Interrogatories to Applicants (Tenth Set)" and "Applicants' Supplemental Response to Eddleman Interrogatory No. 57-C-3-3(b)" were served this 1st day of October, 1984 by deposit in the United States mail, first class, postage prepaid, to the parties on the attached Service List.

*Dale E. Hollar*

\_\_\_\_\_  
Dale E. Hollar  
Associate General Counsel  
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Dated: October 1, 1984

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