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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '84 NOV 28 110 25

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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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' Supplemental Responses to Wells Eddleman's
General Interrogatories to Applicants (11th Set)

Please add the following to the list contained in response to Interrogatory No. G1(e):

<u>Person</u>	<u>Interrogatory No.</u>
Jesse T. Pugh, III, Director Division of Emergency Management N.C. Department of Crime Control & Public Safety Raleigh, North Carolina 27611	213-A-1, 213-A-2, 213-A-3

Please add the following sentence to the response to Interrogatory G10(o)(iii):

The professional qualifications of Mr. Pugh have previously been provided to Mr. Eddleman.

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

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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: (a) Yes.

(b) Attachment 2, Parts 1 through 5 list by title procedures required to implement the plan. The titles of procedures listed indicate the section(s) of the plan to be implemented.

(c) Not applicable.

(d) None. See response to (a) above.

(e) Not applicable. See response to (d) above.

(f) The plan was submitted to FEMA on October 19, 1984 for review.

(g) i - vii Applicants are not aware of any such documentation.

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: (a) Yes.

(b) Attachment 2 to parts 1 through 5 of the plan includes all information required in Criterion II.P.7. of NUREG-0654. The following parts of the Harris Plan contain

implementing procedures: Parts 1 through 5, Section IV, paragraphs B, C, D, E, F and G, Attachment 2, Annexes C, E, G and J.

(c) See response to 213-A-1(f).

(d) Normal operational procedures would suffice.

(e) We believe NUREG-0654 Criterion II.P.7. has been met. See response to (a) above. NUREG-0654 Criterion II.P.7. was the document used in our analysis.

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: Certain parts of the Harris off-site plan contain implementing procedures. These parts were listed in responses provided for Interrogatory 213-A-2. Other implementing procedures as listed in Attachment 2 to Parts 1 through 5 are maintained at the local level. These specific procedures, when combined with the plan, comply with NUREG-0654 Criterion II.P.7. (That criterion provides only for the listing of procedures by title in the plan. Criterion II.P.7. is not a standard for evaluation of the substance of procedures.)

This the 26th day of November 1984.



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

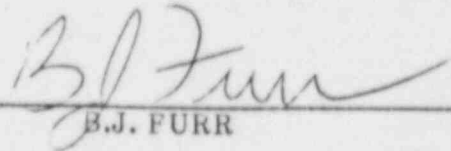
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AFFIDAVIT OF B. J. FURR

County of Wake)
)
State of North Carolina)

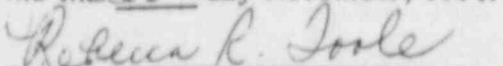
B. J. Furr, being duly sworn according to law, deposes and says that he is Vice President - Operations Training and Technical Services of Carolina Power & Light Company; that the answers to interrogatories on Eddleman Contention 213-A contained in "Applicants' Supplemental Responses to Wells Eddleman's 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 26th day of November, 1984.



B.J. FURR

Sworn to and subscribed before
me this 26th day November, 1984.



Notary Public

My commission expires: My Commission Expires 6-3-85

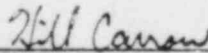
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories to Applicants (Eleventh Set)" were served this 26th day of November, 1984 by deposit in the United States mail, first class, postage prepaid, to the parties on the attached Service List.



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Dated: November 26, 1984

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