

February 19, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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' RESPONSE TO "WELLS EDDLEMAN'S
REQUEST FOR PRODUCTION OF DOCUMENTS"
(CONTENTION 41-G)

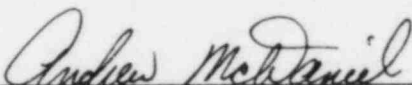
Pursuant to 10 C.F.R. §2.741(d), Applicants hereby respond to Wells Eddleman's Request for Production of Documents as contained in "Wells Eddleman's General Interrogatories to Applicants Carolina Power & Light et al. (12th Set)" by stating the documents identified in "Applicants' Response to 'Wells Eddleman's General Interrogatories to Applicants Carolina Power & Light et al.(12th Set)'" have been made available to Mr. Eddleman for inspection and copying in the following manner:

The requested documents were made available at the corporate offices of Carolina Power & Light Company, 411 Fayetteville Street Mall, Raleigh, North Carolina on February 18, 1985. The documents will be available for further inspection during Carolina Power & Light Company's business hours (or such other mutually agreeable time). Appointments to inspect the documents may be arranged by telephoning Andrew McDaniel at (919) 836-6513 prior to the requested inspection. Applicants will maintain the requested documents assembled in Carolina Power & Light Company's corporate

8502220217 850219
PDR ADOCK 05000400
G PDR

offices available for inspection by Mr. Eddleman until the end of the discovery period for Contention 41-G established by the Board (i.e., March 1, 1985), after which they will be returned to their places of origin.

Inspected documents which Mr. Eddleman wishes to have copied will be reproduced by Carolina Power & Light Company on a schedule compatible with other demands for duplicating equipment. A Carolina Power & Light Company employee will be available during the inspection in order to receive any requests for copying. Copies of such documents will then be furnished to Mr. Eddleman upon payment of 7 cents per page to meet Carolina Power & Light Company's cost of reproduction.



Andrew McDaniel
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602
(919) 836-6513

Attorneys for Applicants:

Thomas A. Baxter, Esquire
John H. O'Neill, Jr., Esquire
Show, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1148

Richard E. Jones, Esquire
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602
(919) 836-6517

Dated: February 19, 1985

February 19, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

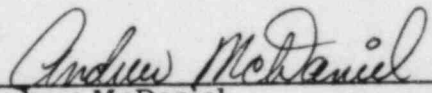
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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))

CERTIFICATE OF SERVICE

I hereby certify that respective copies of "APPLICANTS' RESPONSE TO 'WELLS EDDLEMAN'S GENERAL INTERROGATOIRES TO APPLICANTS CAROLINA POWER & LIGHT et al. (12th Set)" and "APPLICANTS' RESPONSE TO 'WELLS EDDLEMAN'S REQUEST FOR PRODUCTION OF DOCUMENTS' (CONTENTION 41-G)" were served this 19th day of February, 1985 by deposit in the United States Postal Service, first class, postage prepaid, to all parties on the attached Service List.

This the 19th day of February 1985.



Andrew McDaniel
Associate General Counsel
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602
(919) 836-6513

Attorneys for Applicants:

Thomas A. Baxter
John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

Richard E. Jones
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602
(919) 836-6517

SERVICE LIST

James L. Kelley, Esquire
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

Charles A. Barth, Esquire
Myron Karman, Esquire
Office of Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docketing and Service Section
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Daniel F. Read, President
Chapel Hill Anti-Nuclear
Group Effort
Post Office Box 2151
Raleigh, North Carolina 27602

Dr. Linda Little
Governor's Waste Management Board
513 Albemarle Building
325 Salisbury Street
Raleigh, North Carolina 27611

M. Travis Payne, Esquire
Edelstein and Payne
Post Office Box 12643
Raleigh, North Carolina 27605

Dr. Richard D. Wilson
729 Hunter Street
Apex, North Carolina 27502

Mr. Wells Eddleman
718-A Iredell Street
Durham, North Carolina 27705

Thomas A. Baxter, Esquire
John H. O'Neill, Jr., Esquire
Shaw, Pittman, Potts & Trowbridge
1800 M Street, NW
Washington, D.C. 20036

Bradley W. Jones, Esquire
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street
Atlanta, Georgia 30303

Robert P. Gruber
Executive Director
Public Staff
North Carolina Utilities Commission
Post Office Box 29520
Raleigh, North Carolina 27626-0520

John Runkle, Esquire
Conservation Council of North Carolina
307 Granville Road
Chapel Hill, North Carolina 27514