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RELATED CORRESPONDENCE

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October 6, 2000

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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ADJUTANT GENERAL

In the Matter of)
)
CAROLINA POWER & LIGHT)
COMPANY)
(Shearon Harris Nuclear Power Plant)
)

Docket No. 50-400 -OLA

ASLBP No. 99-762-02-LA

**ORANGE COUNTY'S THIRD SET OF ENVIRONMENTAL
DISCOVERY REQUESTS DIRECTED TO THE APPLICANT**

Pursuant to the Board's Memorandum and Order (Ruling on Late-Filed Environmental Contentions) (August 7, 2000), Orange County hereby requests that the Applicant, Carolina Power & Light Co. ("CP&L") answer the following interrogatories within 14 days after service of this request.

I. INSTRUCTIONS

A. Scope of Discovery. These interrogatories cover all information in the possession, custody and control of CP&L, including information in the possession of officers, employees, agents, servants, representatives, attorneys, or other persons directly or indirectly employed or retained by them, or anyone else acting on CP&L's behalf or otherwise subject to its control. The discovery sought by this request encompasses information contained in, or which might be derived or ascertained from, the personal files of CP&L employees, representatives, investigators, and agents.

B. Supplemental Responses. Each of the following requests is a continuing one pursuant to 10 C.F.R. § 2.740(e) and the County hereby demands that, in the event that at any later date CP&L obtains or discovers any additional information which is responsive to these

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SECY-02

requests for production of documents, CP&L shall supplement its responses to this request promptly and sufficiently.

C. Objections. If you refuse to answer any interrogatory under a claim of privilege, immunity, or for any other reason, state the basis for asserting the privilege, immunity, or other reason, and the name of the person on whose behalf the privilege, immunity, or other reason is asserted.

II. DEFINITIONS

Each of the following definitions, unless otherwise indicated, applies to and shall be a part of each interrogatory which follows:

B. "CP&L," "Applicant," "you," and "your" refers to Carolina Power & Light Co., and its their officers, employees, agents, servants, representatives, attorneys, or other persons directly or indirectly employed or retained by CP&L, or anyone else acting on its behalf or otherwise subject to their control.

2. The term "documents" means the originals as well as copies of all written, printed, typed, recorded, graphic, photographic, and sound reproduction matter however produced or reproduced and wherever located, over which you have custody or control or over which you have the ultimate right to custody or control. By way of illustration, but not limited thereto, said term includes: records, correspondence, telegrams, telexes, wiring instructions, diaries, notes, interoffice and intraoffice communications, minutes of meetings, instructions, reports, demands, memoranda, data, schedules, notices, recordings, analyses, sketches, manuals, brochures, telephone minutes, calendars, accounting ledgers, invoices, charts, working papers, computer tapes, computer printout sheets, information stored in computers or other data storage or processing equipment, microfilm, microfiche, corporate minutes, blueprints, drawings,

contracts and any other agreements, rough drafts, and all other writings and papers similar to any of the foregoing, however designated by you. If the document has been prepared and several copies or additional copies have been made that are not identical (or are no longer identical by reason of the subsequent addition of notations or other modifications), each non-identical copy is to be construed as a separate document.

3. "All documents referring or relating to" means all documents that in whole or in part constitute, contain, embody, reflect, identify, state, interpret, discuss, describe, explain, apply to, deal with, evidence, or are in any way pertinent to a given subject.

4. The words "describe" or "identify" shall have the following meanings:

(a) In connection with a person, the words "describe" or "identify" mean to state the name, last known home and business address, last known home and business telephone number, and last known place of employment and job title;

(b) In connection with a document, the words "describe" or "identify" mean to give a description of each document sufficient to uniquely identify it among all of the documents related to this matter, including, but not limited to, the name of the author of the document, the date, title, caption, or other style by which the document is headed, the name of each person and entity which is a signatory to the document, the date on which the document was prepared, signed, and/or executed, the person or persons having possession and/or copies thereof, the person or persons to whom the document was sent, all persons who reviewed the document, the substance and nature of the document, the present custodian of the document, and any other information necessary to adequately identify the document;

(c) In connection with an entity other than a natural person (e.g., corporation, partnership, limited partnership, association, institution, etc.), the words "describe" or "identify"

mean to state the full name, address and telephone number of the principal place of business of such entity.

(d) In connection with any activity, occurrence, or communication, the words “describe” or “identify” mean to describe the activity, occurrence, or communication, the date of its occurrence, the identify of each person alleged to have had any involvement with or knowledge of the activity, occurrence, or communication, and the identity of any document recording or documenting such activity, occurrence, or communication.

5. “Date” shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation thereof (including by relationship to other events), and the basis for such approximation.

6. The word “discussion” shall mean communication of any kind, including but not limited to, any spoken, written, or signed form of communication.

7. The word “person” shall include any individual, association, corporation, partnership, joint venture, or any other business or legal entity.

8. Words herein of any gender include all other genders, and the singular form of words encompasses the plural.

B. The words “and” and “or” include the conjunctive “and” as well as the disjunctive “or” and the words “and/or.”

III. INTERROGATORIES

REQUEST NO 1. For all versions and revisions of the IPE, IPEEE, and PSA for the Harris nuclear power plant, identify any and all review(s) that has/have been conducted of these studies by entities other than CP&L. Identification of these reviews should include the date of the review, the precise subject and scope of the review, the name of the company or government

agency performing the review, the names of individuals within the company or government agency who performed the review, and the results of the review. In addition, please identify any documents that contain discussion of these reviews. If such documents have not been produced in response to Orange County's previous document production requests, either produce them or provide justification for their nondisclosure.

Respectfully submitted,



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CAROLINA POWER & LIGHT)
(Shearon Harris Nuclear)
Power Plant))
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ASLBP No. 99-762-02-LA

CERTIFICATE OF SERVICE

I certify that on October 6, 2000, copies of Orange County's Third Set of Environmental Discovery Requests Directed to the Applicant were served on the service list below by e-mail and/or first class mail as indicated below:

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