

RAS 2294

~~DELETED CORRESPONDENCE~~

DOCKETED
USNRC

October 12, 2000 OCT 17 P5:21

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
FOR PUBLIC AFFAIRS
ADJUTANT GENERAL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
Carolina Power & Light Company	)	Docket No. 50-400-OLA
	)	
(Shearon Harris Nuclear Power Plant)	)	ASLBP No. 99-762-02-LA
	)	

ORANGE COUNTY'S FIRST SUPPLEMENTAL RESPONSE
TO NRC STAFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE BOARD OF COMMISSIONERS OF ORANGE COUNTY

Orange County hereby responds to the document production requests contained in NRC Staff's First Set of Interrogatories and Requests for Production of Documents Directed to the Board of Commissioners of Orange County (September 8, 2000) ("Staff's First Discovery Requests").

I. GENERAL OBJECTIONS

These general objections apply to the County's responses to all of the Staff's First Discovery Requests.

1. The County objects to the Staff's instructions and definitions on the grounds and to the extent that they request or purport to impose upon the County any obligation to respond in manner or scope beyond the requirements set forth in 10 C.F.R. §§ 2.740, 2.741, and 2.742.

2. The County objects to the Staff's discovery requests to the extent that they request discovery of documents protected under the attorney-client privilege, the attorney work-product doctrine, and limitations on discovery of trial preparation materials and experts' knowledge or opinions set forth in 10 C.F.R. § 2.740 or other protection provided by law.

Template = SECY-035

SECY-02

3. The County objects to the Staff's discovery requests to the extent they seek discovery beyond the scope of Contention EC-6 as admitted by the Board in this proceeding. The Staff is permitted only to obtain discovery on matters that pertain to the subject matter with which this proceeding is involved. 10 C.F.R. § 2.740(b).

II. RESPONSE TO DOCUMENT PRODUCTION REQUESTS

DOCUMENT REQUEST NO. 1 All documents requested by, and provided to, the Applicant pursuant to Applicant's First Set of Discovery Requests Regarding Contention EC-6 Directed to the Board of Commissioners of Orange County dated August 30, 2000, at 5-10.

RESPONSE TO REQUEST NO. 1: Orange County has made available documents responsive to both the Staff's and Applicant's document production requests at the offices of Harmon, Curran, Spielberg & Eisenberg in Washington, D.C. Please note that Orange County has not attempted to reproduce studies prepared by the NRC Staff or its contractors, which are available to the NRC Staff in its own files. These documents are listed in Appendix A to this discovery response, entitled "BCOC Bibliography for Environmental Contention, Version of 29 September 2000."

DOCUMENT REQUEST NO. 2. All documents that are identified, referred to or used in responding to all of the above general and specific interrogatories and any subsequent interrogatories and requests for admissions relating to contention EC-6. Specify the interrogatory to which each document relates, and the exact line(s), page(s), or section(s) where applicable.

RESPONSE TO REQUEST NO. 2: Orange County will provide copies of all documents which are identified, referred to or used in responding to interrogatories. It will also endeavor to provide documentary citations in its interrogatory responses, to the extent that it is able to respond to interrogatories before the close of discovery.

DOCUMENT REQUEST NO. 3. All documents (including experts' opinions, work papers, affidavits, and other materials used to render such opinion) supporting or

otherwise relating to affidavits, declarations, testimony or evidence that you intend to use in your Subpart K presentation and/or the hearing on Contention EC-6.

RESPONSE TO REQUEST NO. 3: See response to Request No. 1.

DOCUMENT REQUEST NO. 4. Provide any and all studies Dr. Gordon Thompson has conducted regarding the probability of nuclear reactor accidents, indicating whether these studies have been peer reviewed and which studies are relevant and contain information related to the probability of the seven part accident sequence referenced on page 13 of the Board's August 7, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 4: See response to Request No. 1. Orange County objects to this request to the extent that it requests information on whether these studies have been peer reviewed, on the ground that the term "peer review" is not defined in the question. Dr. Thompson will be prepared to address this question in his deposition on October 16, 2000, provided the term is defined. Of the studies produced by Orange County, the County considers that the following are irrelevant to Contention EC-6:

High-Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy (June 1998)

High-Level Radioactive Liquid Waste at Sellafield: An Updated Review (June 2000)

A Review of the Accident Risk Posed by the Pickering 'A' Nuclear Generating Station (August 2000)

Hazard Potential of the La Hauge Site: An Initial Review (May 2000)

Risk Implications of Potential New Nuclear Plants in Ontario (November 1992)

No Restart for K Reactor (October 1991)

DOCUMENT REQUEST NO. 5. Any and all documents, studies or data relied upon by Dr. Gordon Thompson in any of the studies provided in response to Document Request No. 4.

RESPONSE TO REQUEST NO. 5: Orange County objects to this request to the extent that it requests documents that are not relevant to Contention EC-6. As discussed above, not all of the

studies prepared by Dr. Thompson and produced by Orange County are relevant to Contention EC-6. All documents studies, and data used by Dr. Thompson in his reports are cited therein. Relevant documents have been produced. If the Staff seeks any additional specific studies identified in those reports which are not publicly available, the Staff should contact counsel for Orange County.

DOCUMENT REQUEST NO. 6 All documents upon which Dr. Gordon will rely for his opinion and/or testimony relating to Shearon Harris Nuclear Power Plant and the probability of the seven part accident sequence referenced on page 13 of the Board's August 7, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 6: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 7. Provide all sources, including but not limited to documents, records, statements or treatises, upon which Dr. Gordon Thompson relies in calculating the probability of the seven event accident sequence described on page 13 of the Board's August 7, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 7: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 8. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 1 on page 17 of the Board's August 17, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 8: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 9. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 2 on page 17 of the Board's August 17, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 9: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 10 All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the questions posed in Point # 3 on page 17 of the Board's August 17, 2000, Memorandum and Order.

RESPONSE TO REQUEST NO. 10: Orange County objects to this request to the extent that it seeks documents reflecting legal opinions or conclusions. With respect to factual information, *see* response to Request No. 1.

DOCUMENT REQUEST NO. 11. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of a degraded core accident with containment failure or bypass at the Harris Nuclear Plant.

RESPONSE TO REQUEST NO. 11: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 12. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, mechanisms for containment failure or bypass that could affect accessibility of spent fuel pool cooling and makeup systems at the Harris Nuclear Power Plant.

RESPONSE TO REQUEST NO. 12: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 13. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, mechanisms for degraded core accident that could affect accessibility of spent fuel pool cooling and makeup systems at the Harris Nuclear Power Plant.

RESPONSE TO REQUEST NO. 13: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 14. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, radiation doses at the Harris Nuclear Power Plant that would occur following a degraded core accident with containment failure or bypass.

RESPONSE TO REQUEST NO. 14: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 15. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the inability to restart any pool cooling or makeup systems at the Harris Nuclear Plant due to extreme radiation doses.

RESPONSE TO REQUEST NO. 15: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 16. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the loss of most or all pool water at the Harris Nuclear Plant through evaporation following the loss of pool cooling and makeup systems.

RESPONSE TO REQUEST NO. 16: *See* response to Request No. 1.

DOCUMENT REQUEST NO. 17. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the initiation of an exothermic oxidation reaction in pools C and D at the Harris Nuclear Plant following a partial or complete loss of spent fuel pool water.

RESPONSE TO REQUEST NO. 17: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 18. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of an accident involving the initiation of an exothermic oxidation reaction in pools C and D at the Harris Nuclear Plant following a partial or complete loss of spent fuel pool water.

RESPONSE TO REQUEST NO. 18: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 19. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, the probability of the propagation of an exothermic oxidation reaction between adjacent assemblies in pools C and D at the Harris Nuclear Plant following the initiation of such a reaction.

RESPONSE TO REQUEST NO. 19: *See response to Request No. 1.*

DOCUMENT REQUEST NO. 20. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, contention EC-6 that were used to develop the February, 1999 report by Dr. Gordon Thompson entitled "Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant." This includes any documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding probabilities, dose consequences, and inaccessibility to reestablish cooling within the scope of contention EC-6.

RESPONSE TO REQUEST NO. 20: All documents responsive to this request are identified in Dr. Thompson's February 1999 report. To the extent that they are relevant to Contention EC-6, they have been produced. If the Staff seeks copies of specific documents identified in the report that are not publicly available and have not already been produced, it should contact counsel for Orange County.

DOCUMENT REQUEST NO. 21. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, contention EC-6 that are referenced in the February, 1999 report by Dr. Gordon Thompson entitled "Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant." This includes any documents relevant to, or reasonably calculated to lead

to the discovery of relevant information regarding probabilities, dose consequences, and inaccessibility to reestablish cooling within the scope of contention EC-6.

RESPONSE TO REQUEST NO. 21: See response to Request No. 20.

DOCUMENT REQUEST NO. 22. All documents relevant to, or reasonably calculated to lead to the discovery of relevant information regarding, any proceeding in which Dr. Gordon Thompson has been a witness or a consultant on any subject within the scope of contention EC-6. This request includes, but is not limited to: any deposition transcripts, testimony, affidavits, declarations, or expert reports sponsored in whole or in part by Dr. Gordon Thompson; any documents considered or relied on by Dr. Gordon Thompson in developing such testimony, affidavits, declarations, or expert report documents; any deposition transcripts, testimony, affidavits, declarations or expert reports filed by other parties to the proceedings; and any documents turned over by Dr. Thompson or any party in discovery.

RESPONSE TO REQUEST NO. 22: See response to Request No. 4.

Respectfully submitted,



Diane Curran
Harmon, Curran, Spielberg & Eisenberg
1726 M Street N.W., Suite 600
Washington, D.C. 20036
202/328-3500
dcurran@harmoncurran.com

October 12, 2000

Appendix A: BCOC Bibliography for Environmental Contention
Version of 29 September 2000

(ANS/IEEE, 1983)

American Nuclear Society and Institute of Electrical and Electronics Engineers, PRA Procedures Guide, NUREG/CR-2300 (2 volumes) (Washington, DC: US Nuclear Regulatory Commission, January 1983).

(Barker, 1982)

C D Barker, A Virtual Source Model for Building Wake Dispersion in Nuclear Safety Calculations (United Kingdom: Central Electricity Generating Board, March 1982).

(Benjamin et al, 1979)

Allan S Benjamin and 3 other authors, Spent Fuel Heatup Following Loss of Water During Storage, NUREG/CR-0649 (Washington, DC: US Nuclear Regulatory Commission, March 1979).

(Beyea, 1979)

Jan Beyea, "The Effects of Releases to the Atmosphere of Radioactivity from Hypothetical Large-Scale Accidents at the Proposed Gorleben Waste Treatment Facility", in Chapter 3 of Report of the Gorleben International Review, submitted (in German) to the Government of Lower Saxony, March 1979.

(Bohn et al, 1988)

Michael P Bohn and 2 other authors, Approaches to Uncertainty Analysis in Probabilistic Risk Assessment, NUREG/CR-4836 (Washington, DC: US Nuclear Regulatory Commission, January 1988).

(Budnitz et al, 1997)

R J Budnitz and 6 other authors, Recommendations for Probabilistic Seismic Hazard Analysis: Guidance on Uncertainty and Use of Experts, NUREG/CR-6372 (2 volumes) (Washington, DC: US Nuclear Regulatory Commission, April 1997).

(Burke et al, 1982)

Richard P Burke and 2 other authors, In-Plant Considerations for Optimal Offsite Response to Reactor Accidents, NUREG/CR-2925, (Washington, DC: US Nuclear Regulatory Commission, November 1982).

(Chen, 1993)

John T Chen, "Consideration of external events in the individual plant examination program", Nuclear Engineering and Design, Volume 142, 1993, pp 231-237.

(CP&L, 1998)

Carolina Power and Light Company, Shearon Harris Nuclear Power Plant, Docket No. 50-400/License No. NPF-63, Request for License Amendment, Spent Fuel Storage (New Hill, NC: CP&L, 23 December 1998).

(CP&L, 1993)

Carolina Power & Light Company, Shearon Harris Nuclear Power Plant, Unit No. 1: Individual Plant Examination Submittal, August 1993.

(CP&L, 1995)

Carolina Power & Light Company, Shearon Harris Nuclear Power Plant, Unit No. 1: Individual Plant Examination for External Events Submittal, June 1995.

(Cramond and Spulak, 1981)

Wallis R Cramond and Robert G Spulak, Analysis of Nuclear Power Plant Systems Containing Radioactivity in a Core Damage Accident, NUREG/CR-2270 (Washington, DC: US Nuclear Regulatory Commission, November 1981).

(Darby et al, 1995)

John L Darby and 2 editors, Shearon Harris: Technical Evaluation Report on the Individual Plant Examination Front End Analysis (location unknown: Science and Engineering Associates, 16 June 1995).

(DiSalvo et al, 1985)

R DiSalvo and 3 other authors, Management of Severe Accidents, NUREG/CR-4177, Volume 1 (Washington, DC: US Nuclear Regulatory Commission, May 1985).

(Finch, 1987)

Stuart C Finch, "Acute Radiation Syndrome", JAMA, 7 August 1987, Volume 258, Number 5, pp 664-667.

(Fleming et al, 1987)

Karl N Fleming and 11 other authors, Risk Management Actions to Assure Containment Effectiveness at Seabrook Station (Newport Beach, CA: Pickard, Lowe and Garrick Inc, July 1987).

(Gale, 1987)

Robert P Gale, "Immediate Medical Consequences of Nuclear Accidents", JAMA, 7 August 1987, Volume 258, Number 5, pp 625-628.

(Gittus et al, 1982)

J H Gittus and 40 other authors, PWR degraded core analysis (United Kingdom: UK Atomic Energy Authority, April 1982).

(Golding et al, 1995)

Dominic Golding and 2 other editors, Preparing for Nuclear Power Plant Accidents (Boulder, CO: Westview Press, 1995).

(Hirsch et al, 1989)

H Hirsch and 3 other authors, IAEA Safety Targets and Probabilistic Risk Assessment (Hannover, Germany: Gesellschaft fur Okologische Forschung und Beratung, August 1989).

(Leigh et al, 1986)

Christi Leigh and 5 other authors, Analyses of Plume Formation, Aerosol Agglomeration and Rainout Following Containment Failure, NUREG/CR-4222 (Washington, DC: US Nuclear Regulatory Commission, August 1986).

(Linnemann, 1987)

Roger E Linnemann, "Soviet Medical Response to the Chernobyl Nuclear Accident", JAMA, 7 August 1987, Volume 258, Number 5, pp 637-643.

(Lochbaum, 2000)

David Lochbaum, Nuclear Plant Risk Studies: Failing the Grade (Washington, DC: Union of Concerned Scientists, August 2000).

(McKenna et al, 1987)

T J McKenna and 8 other authors, Pilot Program: NRC Severe Reactor Accident Incident Response Training Manual, NUREG-1210 (5 volumes) (Washington, DC: US Nuclear Regulatory Commission, February 1987).

(Molina and Cochrell, 1986)

Toni Molina and Ruby Cochrell (editors), Proceedings of the Third Workshop on Containment Integrity, NUREG/CP-0076 (Washington, DC: US Nuclear Regulatory Commission, August 1986).

(Molina and Cochrell, 1984)

Toni Molina and Ruby Cochrell (editors), Proceedings of the Second Workshop on Containment Integrity, NUREG/CP-0056 (Washington, DC: US Nuclear Regulatory Commission, August 1984).

(Niemczyk, 1987)

S J Niemczyk (editor), Proceedings of the Symposium on Chemical Phenomena Associated with Radioactive Releases During Severe Nuclear Plant Accidents, NUREG/CP-0078 (Washington, DC: US Nuclear Regulatory Commission, June 1987).

(Nourbakhsh et al, 1998)

H P Nourbakhsh and 2 other authors, Analysis of Spent Fuel Heatup Following Loss of Water in a Spent Fuel Pool, A Users' Manual for the Computer Code SHARP, Draft Report for Comment, NUREG/CR-6441 (Washington, DC: US Nuclear Regulatory Commission, May 1998).

(NRC/EPA, 1978)

NRC/EPA Task Force on Emergency Planning, Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants, NUREG-0396 (Washington, DC: US Nuclear Regulatory Commission, December 1978).

(NRC/FEMA, 1980)

US Nuclear Regulatory Commission and Federal Emergency Management Agency, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, NUREG-0654 (Washington, DC: NRC, November 1980).

(NRC, 1997a)

US Nuclear Regulatory Commission, Individual Plant Examination Program: Perspectives on Reactor Safety and Plant Performance, NUREG-1560 (3 volumes) (Washington, DC: NRC, December 1997).

(NRC, 1997b)

US Nuclear Regulatory Commission, The Use of PRA in Risk-Informed Applications, Draft Report for Comment, NUREG-1602 (Washington, DC: NRC, June 1997).

(NRC, 1990)

US Nuclear Regulatory Commission, Severe Accident Risks: An Assessment for Five US Nuclear Power Plants, NUREG-1150 (2 volumes) (Washington, DC: NRC, December 1990).

(NRC, 1984)

US Nuclear Regulatory Commission, Probabilistic Risk Assessment (PRA) Reference Document, Final Report, NUREG-1050, (Washington, DC: NRC, September 1984).

(NRC, 1983)

US Nuclear Regulatory Commission, Final Environmental Statement Related to the Operation of Shearon Harris Nuclear Power Plant Units 1 and 2, NUREG-0972, (Washington, DC: NRC, October 1983).

(NRC, 1982)

US Nuclear Regulatory Commission, NRC Report on the January 25, 1982 Steam Generator Tube Rupture at R E Ginna Nuclear Power Plant, NUREG-0909, (Washington, DC: NRC, April 1982).

(NRC, 1981)

US Nuclear Regulatory Commission, Final Programmatic Environmental Impact Statement related to decontamination and disposal of radioactive wastes resulting from March 28, 1979, accident, Three Mile Island Nuclear Station, Unit 2, NUREG-0683 (2 volumes) (Washington, DC: NRC, March 1981).

(NRC, 1979)

US Nuclear Regulatory Commission, Generic Environmental Impact Statement on Handling and Storage of Spent Light Water Power Reactor Fuel, NUREG-0575 (2 volumes), (Washington, DC: NRC, August, 1979).

(NRC, 1975)

US Nuclear Regulatory Commission, Reactor Safety Study, WASH-1400 (NUREG-75/014), Appendix VI (Washington, DC: NRC, October 1975).

(Pelto et al, 1985)

P J Pelto and 2 other authors, Reliability Analysis of Containment Isolation Systems, NUREG/CR-4220 (Washington, DC: US Nuclear Regulatory Commission, June 1985).

(Pisano et al, 1984)

Nicola A Pisano and 3 other authors, The Potential for Propagation of a Self-Sustaining Zirconium Oxidation Following Loss of Water in a Spent Fuel Storage Pool, rough draft report prepared for the US Nuclear Regulatory Commission, January 1984.

(Prassinis et al, 1989)

P G Prassinios and 8 other authors, Seismic Failure and Cask Drop Analyses of the Spent Fuel Pools at Two Representative Nuclear Power Plants, NUREG/CR-5176 (Washington, DC: US Nuclear Regulatory Commission, January 1989).

(Rogovin et al, 1980)

Mitchell Rogovin (director), Three Mile Island: A Report to the Commissioners and the Public (2 volumes) (Washington, DC: US Nuclear Regulatory Commission, January 1980).

(Sailor et al, 1987)

V L Sailor and 3 other authors, Severe Accidents in Spent Fuel Pools in Support of Generic Safety Issue 82, NUREG/CR-4982 (Washington, DC: US Nuclear Regulatory Commission, July 1987).

(Shleien, 1983)

Bernard Shleien, Preparedness and Response in Radiation Accidents (Rockville, MD: US Department of Health and Human Services, August 1983).

(Sholly and Thompson, 1986)

Steven C Sholly and Gordon Thompson, The Source Term Debate (Cambridge, Massachusetts: Union of Concerned Scientists, January 1986).

(Siu et al, 1996)

N Siu and 4 other authors, Loss of Spent Fuel Pool Cooling PRA: Model and Results, INEL-96/0334 (Idaho Falls, ID: Idaho National Engineering Laboratory, September 1996).

(Thompson, 1999)

Gordon Thompson, Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant (Cambridge, Massachusetts: Institute for Resource and Security Studies, February 1999).

(Thompson, 1996)

Gordon Thompson, War Terrorism and Nuclear Power Plants (Canberra: Peace Research Centre, Australian National University, October 1996).

(Throm, 1989)

E D Throm, Regulatory Analysis for the Resolution of Generic Issue 82, "Beyond Design Basis Accidents in Spent Fuel Pools", NUREG-1353 (Washington, DC: US Nuclear Regulatory Commission, April 1989).

(Travis et al, 1997)

R J Travis and 3 other authors, A Safety and Regulatory Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants, NUREG/CR-6451 (Washington, DC: US Nuclear Regulatory Commission, August 1997).

(Vijaykumar et al, 1995)

R Vijaykumar and 2 other authors, Technical Evaluation Report of the Shearon Harris Individual Plant Examination Back-End Submittal (Rockville, MD: Energy Research Inc, May 1995).

(Wreathall et al, 1985)

J Wreathall and 2 other authors, Management of Severe Accidents, NUREG/CR-4177, Volume 2 (Washington, DC: US Nuclear Regulatory Commission, May 1985).

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

In the Matter of	)	
	)	
CAROLINA POWER & LIGHT	)	Docket No. 50-400 -OLA
(Shearon Harris Nuclear	)	ASLBP No. 99-762-02-LA
Power Plant)	)	
	)	

CERTIFICATE OF SERVICE

I certify that on October 12, 2000, copies of Orange County's First Supplemental Response to NRC Staff's First Set of Interrogatories and Requests for Production of Documents Directed to the Board of Commissioners of Orange County were served on the service list below by e-mail and/or first class mail as indicated below:

Secretary of the Commission
Attention: Rulemakings and Adjudications
Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: hearingdocket@nrc.gov

Steven Carr, Esq.
Carolina Power & Light Co.
411 Fayetteville Street Mall
Post Office Box 1551 - CPB 13A2
Raleigh, NC 27602-1551
E-mail: steven.carr@cplc.com

Susan L. Uttal, Esq.
Jennifer M. Euchner, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: slu@nrc.gov, jme@nrc.gov

Moses Carey, Chair
Orange County Board of Commissioners
P.O. Box 8181
Hillsborough, NC 27278
E-mail: Mccarey@mindspring.com

Paul Thames
County Engineer
Orange County Board of Commissioners
P.O. Box 8181
Hillsborough, NC 27278

Adjudicatory File
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dr. Peter S. Lam
Atomic Safety and Licensing Board
Mail Stop T 3F-23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: psl@nrc.gov

Thomas D. Murphy
Atomic Safety and Licensing Board
Mail Stop T 3F-23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: fjs@nrc.gov

John H. O'Neill, Jr., Esq.
Douglas Rosinski, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street N.W.
Washington, D.C. 20037-1128
E-mail: john_o'neill@shawpittman.com,
douglas.rosinski@shawpittman.com

G. Paul Bollwerk, III, Chairman
Atomic Safety and Licensing Board
Mail Stop T 3F-23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
E-mail: gpb@nrc.gov


Diane Curran