

774

RELATED CORRESPONDENCE

December 21, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 DEC 24 12:00

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
REGULATORY & SERVICE
BRANCH

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

Docket No. 50-400 OL

APPLICANTS' RESPONSE TO WELLS EDDLEMAN'S SECOND ROUND
INTERROGATORIES ON 213-A TO APPLICANTS/EMERGENCY RESPONSE
PERSONNEL AND REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants' Carolina Power & Light Company ("CP&L") and North Carolina Eastern Municipal Power Agency, pursuant to 10 C.F.R. § 2.740b hereby submit the following responses to Wells Eddleman's "Second Round Interrogatories on 213-A to Applicants/Emergency Response Personnel and Request for Production of Documents." The provision of answers to these General Interrogatories is not to be deemed a representation that Applicants consider the information sought to be relevant to the issues to be heard in this proceeding.

GENERAL INTERROGATORY: Please provide new or supplemental answers to all general interrogatories in the 11th set for which your answer(s) would now be different or are now different, to those questions.

ANSWER. Applicants responses to general interrogatories as set forth in "Applicants' Response to Wells Eddleman's Second Round Interrogatories and Request for Production of Documents to CP&L and North Carolina/County Emergency Planners on Contentions 57-C-7 and 240" are the same except for the following: In Answer G1(c), add the following interrogatory numbers after Jesse T. Pugh, III: 213-A-4, 213-A-5, 213-A-6.

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PDR ADOCK 05000400
G PDR

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INTERROGATORY NO. 213-A-4. Are there any implementing procedures for part(s) of the Emergency Response plan (offsite plan) in support of the Shearon Harris Nuclear Power plant which are not included in the plan?

ANSWER. Those standard operating procedures which are believed required to implement the Harris Emergency Response Plan have been identified in the plan.

INTERROGATORY NO. 213-A-5. Please identify any and all procedures used or required for the Harris offsite plan, which are not (a) fully set forth (b) referenced, in that offsite plan.

ANSWER. Not Applicable. See Answer 213-A-4 above.

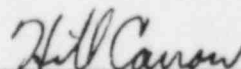
INTERROGATORY NO. 213-A-6. Are there any procedures for implementing any part(s) of the Harris offsite plan, which are necessary to implement any part(s) of that plan, which are not (a) listed by title and part(s) it implements (b) fully set forth in the plan? (c) Please identify all such procedures and each part of the plan which each is necessary to implement.

ANSWER. Such procedures are believed listed in conformance with applicable requirements.

REQUEST FOR PRODUCTION OF DOCUMENTS: Please produce all documents which the identification of is requested above, at a mutually agreeable time and place, for inspection and copying.

ANSWER. No documents have been identified.

This the 21st day of December, 1984.



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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 Contention 213-A contained in "Applicants' Response to Wells Eddleman's Second Round Interrogatories on 213-A to Applicants/Emergency Response Personnel and Request for Production of Documents" 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 21st day of December, 1984.

B. J. Furr
B. J. Furr

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

Rebecca R. Joole
Notary Public

My commission expires: 6-8-86

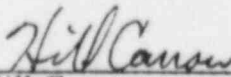
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Wells Eddleman's Second Round Interrogatories on 213-A To Applicants/Emergency Response Personnel and Request for Production of Documents" were served this 21st day of December, 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: December 21, 1984

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