

October 31, 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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
	)	

NRC STAFF'S FIRST SUPPLEMENTAL RESPONSE TO ORANGE COUNTY'S  
SECOND SET OF ENVIRONMENTAL DISCOVERY REQUESTS  
DIRECTED TO NRC STAFF

The Nuclear Regulatory Commission staff (Staff) hereby files its first supplemental response to Orange County's<sup>1</sup> Second Set of Environmental Discovery Requests Directed to NRC Staff, filed October 6, 2000. In filing this First Supplemental Response, the Staff does not waive any general or specific objections, rights or privileges, previously asserted in responding to BCOC's discovery requests.<sup>2</sup>

The Staff hereby supplements its responses to BCOC's discovery requests as follows.

**A. INTERROGATORIES**

**INTERROGATORY 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 the NRC Staff has conducted. Identification of these reviews should include the date of the review, the precise subject and scope of the review, the name of any NRC Staff contractor organization that participated in the review, and the names of any NRC Staff members, individual contractors or

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<sup>1</sup> Hereinafter "BCOC" or "Intervenors."

<sup>2</sup> See "NRC Staff's Response to Orange County's First Set of Environmental Discovery Requests Directed to NRC Staff," September 6, 2000; "NRC Staff's First Supplemental Response to Orange County's First Set of Environmental Discovery Requests Directed to NRC Staff," September 20, 2000; "NRC Staff's Second Supplemental Response to Orange County's First Set of Environmental Discovery Requests Directed to NRC Staff," September 27, 2000; "NRC Staff's Third Supplemental Response to Orange County's First Set of Environmental Discovery Requests Directed to NRC Staff," September 27, 2000.

contractor employees who participated in 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.

**STAFF RESPONSE:**

The Staff objects to the extent that the request seeks predecisional or privileged material or draft agency documents exempt from disclosure pursuant to 10 C.F.R. § 2.790. Without waiving that objection, the Staff supplements its original response as follows:

The following additional documents refer to the IPE review, and are attached to the copy of this response being served via the U.S Postal Service:

Memorandum from W. Hodges (RES/DST) to S. Varga (DRPE), December 26, 1995.

Memorandum from J. Lane (RES), July 5, 1994.

Note to J. Lane from J. Flack, July 19, 1994.

Memorandum from N. Le to S. Bajwa, September 9, 1993.

Memorandum from C. Ader (SAIB) to D. Matthews, September 26, 1994.

The following additional documents refer to the IPEEE review, and are attached to the copy of this response being served via the U.S. Postal Service:

Memorandum from T. King (RES) to J. Zwolinski, January 5, 2000.

Memorandum from A. Rubin (RES), June 19, 1998.

Memorandum from A. Rubin to M. Cunningham, August 4, 1997.

Respectfully submitted,



Susan L. Uttal  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 31st day of October 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER & LIGHT COMPANY

(Shearon Harris Nuclear Power Plant)

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Docket No.50-400-LA  
ASLBP No. 99-762-02-LA

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST SUPPLEMENTAL RESPONSE TO ORANGE COUNTY'S SECOND SET OF ENVIRONMENTAL DISCOVERY REQUESTS DIRECTED TO NRC STAFF" in the above-captioned proceeding have been served on the following through deposit in the NRC's internal mail system, or by deposit in the NRC's internal mail system, with copies by electronic mail, as indicated by an asterisk, or by deposit in U.S. Postal Service as indicated by double asterisk, with copies by electronic mail as indicated this 31st day of October, 2000:

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