

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.

WASHINGTON, D. C. 20036

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

JOHN F. DEALY*

COUNSEL

DOCKETED
USNRC

*82 NOV -4 A10:29

RAMSAY D. POTTS, P.C.
STUART L. PITTMAN, P.C.
GEORGE F. TROWBRIDGE, P.C.
STEPHEN D. POTTS, P.C.
GERALD CHARNOFF, P.C.
PHILLIP D. BOSTWICK, P.C.
R. TIMOTHY HANLON, P.C.
GEORGE M. ROGERS, JR., P.C.
FRED A. LITTLE, P.C.
JOHN B. RHINELANDER, P.C.
BRUCE W. CHURCHILL, P.C.
LESLIE A. NICHOLSON, JR., P.C.
MARTIN D. KRALL, P.C.
RICHARD J. KENDALL, P.C.
JAY E. SILBERG, P.C.
BARBARA M. ROSSOTTI, P.C.
GEORGE V. ALLEN, JR., P.C.
FRED DRASNER, P.C.
R. KENLY WEBSTER, P.C.
NATHANIEL P. BREED, JR., P.C.
MARK AUGENBLICK, P.C.
ERNEST L. BLAKE, JR., P.C.
CARLETON S. JONES, P.C.

THOMAS A. BAXTER, P.C.
JAMES M. BURGER, P.C.
SHELDON J. WEISEL, P.C.
JOHN A. McCULLOUGH, P.C.
J. PATRICK HICKEY, P.C.
GEORGE P. MICHAELY, JR., P.C.
J. THOMAS LENHART, P.C.
STEVEN L. MELTZER, P.C.
DEAN D. AULICK, P.C.
JOHN ENGEL, P.C.
CHARLES B. TEMKIN, P.C.
STEPHEN B. HUTTLER, P.C.
WINTHROP N. BROWN, P.C.
JAMES B. HAMLIN, P.C.
RANDAL B. KELL, P.C.
ROBERT E. ZAHLER
RICHARD E. GALEN
ROBERT B. ROBBINS
STEVEN M. LUCAS
DAVID M. RUBENSTEIN
LYNN WHITTLESEY WILSON
MATIAS F. TRAVIESO-SIAZ
VICTORIA J. PERKINS

JOHN H. O'NEILL, JR.
JAY A. EPSTEIN
RAND L. ALLEN
TIMOTHY B. McBRIDE
ELISABETH M. PENDLETON
PAUL A. KAPLAN
HARRY H. GLASSPIEGEL
JEFFERY L. YABLON
JACK MCKAY
THOMAS H. MCCORMICK
SUSAN M. FREUND
JOHN L. CARR, JR.
PHILIP J. HARVEY
ROBERT M. GORDON
BARBARA J. MORGAN
BONNIE S. GOTTLIEB
HOWARD H. SHAFFERMAN
DEBORAH B. BAUSER
SCOTT A. ANENBERG
CAMPBELL KILLEFER
SETH H. HOOGASIAN
SHEILA MCC. HARVEY
DELISSA A. RIDGWAY

KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
ANNE M. KRAUSKOPF
FREDERICK L. KLEIN
GORDON R. KANOFKY
JEFFREY S. GIANCOLA
HANNAH E. M. LIEBERMAN
SANDRA E. FOLSOM
MARCIA K. NIRENSTEIN
JUDITH A. SANDLER
EDWARD D. YOUNG, III
ROBERT L. WILLMORE
ANDREW D. ELLIS
WENDELIN A. WHITE
KRISTI L. LIMBO
LESLIE K. SMITH
VIRGINIA S. RUTLEDGE
KATHERINE P. CHEEK
JANICK LEHRER-STEIN
TRAVIS T. BROWN, JR.
GAIL E. CURREY
RICHARD H. KRONTHAL
STEPHEN B. HEIMANN
*NOT ADMITTED IN D.C.

WRITER'S DIRECT DIAL NUMBER

November 3, 1982

822-1090

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

In the Matter of
Carolina Power & Light Company and North
Carolina Eastern Municipal Power Agency
(Shearon Harris Nuclear Power Plant, Units 1 and 2)
Docket Nos. 50-400 OL and 50-401 OL

Dear Mr. Runkle:

I was pleased to see in the "Response to Memorandum and Order" filed by the Conservation Council of North Carolina on October 14, 1982, your comments on the discussion we had at the special pre-hearing conference with respect to the discovery process. You mentioned CCNC's desire to meet again with Applicants and the NRC Staff to continue that discussion and formulate a workable schedule for discovery.

The Applicants are interested in pursuing your suggestion. You may recall that at informal meetings held prior to the pre-hearing conference, we proposed a discovery schedule for the other parties to consider. At that time there was reluctance on the part of one or more of the petitioners to pursue the discussion.

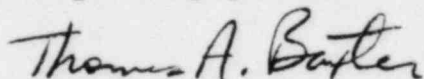
Would you undertake to contact Mr. Eddleman, Dr. Wilson, and representatives of CHANGE/ELP, the Kudzu Alliance, and Citizens Against Nuclear Power to ascertain whether they would

SHAW, PITTMAN, POTTS & TROWBRIDGE
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

John D. Runkle, Esquire
November 3, 1982
Page Two

be interested in a meeting to continue the discussion on the discovery process? We would be happy to participate in such a meeting if there is interest by a significant number of the intervenors.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas A. Baxter".

Thomas A. Baxter
Counsel for Applicants

TAB:jah

cc: Service List

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket Nos. 50-400 OL
AND NORTH CAROLINA EASTERN)	50-401 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

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
P.O. Box 524
Chapel Hill, North Carolina 27514

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

M. Travis Payne, Esquire
Edelstein and Payne
P.O. 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

Ms. Patricia T. Newman
Mr. Slater E. Newman
Citizens Against Nuclear Power
2309 Weymouth Court
Raleigh, North Carolina 27612

Richard E. Jones, Esquire
Vice President & Senior Counsel
Carolina Power & Light Company
P.O. Box 1551
Raleigh, North Carolina 27602