

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

June 21, 1982

Before the ATOMIC SAFETY AND LICENSING BOARD Dockets 50-400/401 O.L.

Pursuant to the June 3 conference call and the Board's order served June 7, 1982 as regards a list of 20 contentions to first be discussed at the special prehearing conference now scheduled ~~xxxx~~ for July 13-14, 1982, Wells Eddleman states the following:

(1) since at this stage of the proceeding it is not necessary to reach the merits of any contention, but only to establish that contentions are sufficiently specific to put Applicants on notice "at least generally," what they are expected to defend against, the following in no way states, nor can the Board require me to state, which are the <sup>"most important" or</sup> "best" contentions I have filed. I object to that part of the Board's Order served June 7 as ~~improper~~ improper and irrelevant, for the above reasons. Yet,

(2) it is obvious from the conference call (transcript not yet at the LPDR) of June 3 that the Board wants me to list the first 20 contentions I want to have discussed at the July 13-14 conference, and perhaps a further "next 20". Subject to the above, I have no problem doing that. The list of contentions follows, with <sup>some of</sup> those related to a contention designated for discussion placed in parentheses parenthesis and in it a list for some listed contentions. A lack of ~~subset~~ does not mean there are not related contentions to one listed.


First 20 to discuss: #'s 3(127X, etc; 6-5-82 amendment), 4, 7<sup>37(69,8)</sup>, 14, 15 (16 thru 23, 94, 95, 104, 114, 126, 126X, 129 etc), 57 (56, 1, 2, 29, 30, 32, 97, 103, 118), 46, 47 (48-51, 97, 110, 115, 125, 130), 54 (53, 133, 33, 34), 59, 60, 64 (24-28, etc), ~~78(134)~~ 78(134) 8, 84, 87, 105, 112, 115, 132. Next 20: 106, 134, 70, 71, 72, 116, 131, 136, 137, 6, 33, 73, 110, 91, 97, 103, 120, 10, 128, 52.

*Wells Eddleman*

CERTIFICATE OF SERVICE

I hereby certify that the following have been served with a copy of the lists of first 20 and second 20 contentions to discuss, as I wrote them, on the back of this page. Service was by first class US mail, postage prepaid, in a depository under the exclusive care & custody of the US Postal Service, on June 21, 1982.

This 21st day of June, 1982



Wells Eddleman

ATOMIC SAFETY AND LICENSING BOARD  
Dockets 50-400/401 O.L.  
Judges Kelley, Carpenter and Bright  
US NRC  
Washington DC 20555

and to all petitioners to  
intervene.

(one copy enclosed for each judge)

Marjorie Ulman Rothschild  
Counsel for NRC Staff  
USNRC  
Washington, DC 20555

Secretary of the Commission  
USNRC  
Washington DC 20555  
(3 copies)

George F. Trowbridge  
Shaw Pittman Potts & Trowbridge  
1800 M St. NW  
Washington Dc 20036

(CP&L has not responded as to whom to serve; I assume Trowbridge is still the one, but this once I'll also serve Richard Jones in Raleigh, since CP&L doesn't seem to use its resources to answer even a simple question.)

Richard E. Jones  
Legal Department  
CP&L  
Box 1551  
Raleigh NC 27602