

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.
WASHINGTON, D. C. 20036

DOCKETED
USNRC

'83 JAN 24 A11:48

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 P. 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. GALLEN
ROBERT B. ROBBINS
STEVEN M. LUCAS
DAVID M. RUBENSTEIN
LYNN WHITTLESEY WILSON
MATIAS F. TRAVIESO-DIAZ
VICTORIA J. PERKINS

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

RAPIDFAX 100

(202) 822-1072

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

JOHN F. DEALY*

COUNSEL

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. HODGASIAN
SHEILA MCC. HARVEY
DELISSA A. RIDGWAY
KENNETH J. HAUTMAN

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

WRITER'S DIRECT DIAL NUMBER

(202) 822-1148

January 21, 1983

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

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 and 50-401 OL

Administrative Judges Kelley, Bright and Carpenter:

For the convenience of the Board and the parties in this proceeding, we are filing the codification of the admitted contentions in this proceeding. This filing consists of Appendix A to "Applicants' Motion for Codification of Admitted Contentions" (December 17, 1983), as modified by the Board's Memorandum and Order (Addressing Applicants' Motion for Codification) (January 17, 1983).

8301250645 830121
PDR ADOCK 05000400
G PDR

DS03

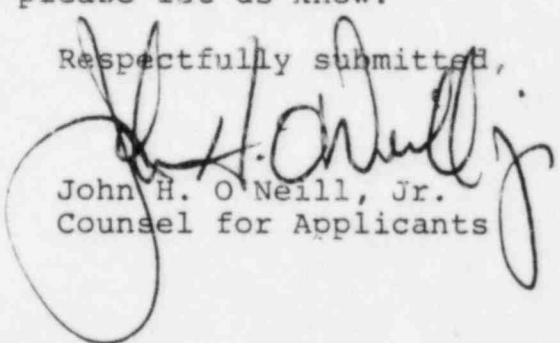
SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

James L. Kelley, Esquire
Mr. Glenn O. Bright
Dr. James H. Carpenter
January 21, 1983
Page Two

Also, enclosed with this letter are "Applicants' Response to Petitioner Phyllis Lotchin's Contentions to Amendment 5 of the SHNPP Environmental Report" and "Applicants' Response to Intervenor Wilson's Response to Human Factors Design Evaluation Report for the Shearon Harris I Control Room." For the convenience of the Board in reviewing Applicants' response to Dr. Wilson's pleading, we have served on the Board Chairman a copy of the Report "Human Factors Design Evaluation Report for the Shearon Harris Unit 1 Control Room", which was previously served on Dr. Wilson, certain other designated parties, and the public documents rooms by letter dated December 7, 1980. If the Board requires additional copies, please let us know.

Respectfully submitted,



John H. O'Neill, Jr.
Counsel for Applicants

Enclosures

cc: Service List Attached

January 21, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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
) 50-401 OL
)
)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of (1) "Admitted Contentions," (2) "Applicants' Response to Petitioner Phyllis Lotchin's Contentions to Amendment 5 of the SHNPP Environmental Report," and (3) "Applicants' Response to Intervenor Wilson's Response to Human Factors Design Evaluation Report for the Shearon Harris I Control Room," all dated January 21, 1983, are being served to all those on the attached Service List by deposit in the U.S. Mail, first class, postage prepaid, this 21st day of January, 1983.


John H. O'Neill, Jr.

Dated: January 21, 1983

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

Dr. Phyllis Lotchin
108 Bridle Run
Chapel Hill, North Carolina 27514