

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'83 JUN -6 A11:51

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

APPLICANTS' RESPONSE TO WELLS EDDLEMAN'S REQUEST
FOR PRODUCTION OF DOCUMENTS (CONTENTION 45)

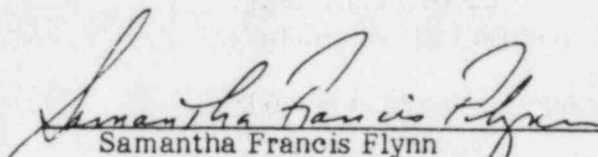
Pursuant to 10 C.F.R. §2.741(d), Applicants hereby respond to Wells Eddleman's Request for Production of Documents as contained in Wells Eddleman's General Interrogatories and Interrogatories on Contention 45 to Applicants Carolina Power & Light (First Set) by stating that the documents identified in Applicants' Answers to Wells Eddleman's General Interrogatories and Interrogatories on Contention 45 to Applicants (First Set) will be made available to Mr. Eddleman for inspection and copying in the following manner:

The requested documents, other than those designated as proprietary, will be made available at the corporate offices of Carolina Power & Light Company, 411 Fayetteville Street Mall, Raleigh, North Carolina, 27602. The documents will be made available during Carolina Power & Light Company business hours (or such other mutually agreeable time). Appointments to inspect the documents may be arranged by telephoning Samantha Francis Flynn at 836-7707, at least 24 hours before the requested inspection. Applicants will maintain the requested documents assembled in Carolina Power & Light Company offices, available for inspection by Mr. Eddleman, for a reasonable time (i.e., through July 8, 1983), after which they will be returned to their place of origin.

For those documents designated as proprietary, consent of the owner and an agreement by Mr. Eddleman to abide by the terms of disclosure established by the owner will be required before Applicants will be able to produce such documents for inspection.

Inspected documents which Mr. Eddleman wishes to have copied will be reproduced by Carolina Power & Light Company on a schedule compatible with other demands for duplicating equipment. A Carolina Power & Light Company employee will be available during the inspection in order to receive any requests for copying. Copies of such selected documents will then be furnished to Mr. Eddleman upon payment of 7 cents per page, to meet Carolina Power & Light Company's cost of reproduction.

This the 3rd day of June, 1983.


Samantha Francis Flynn
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602
(919) 836-7707

Attorneys for Applicants:

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June 3, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD JUN -6 AM 11:51

In the Matter of

CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN MUNICIPAL)
POWER AGENCY)

(Shearon Harris Nuclear Power Plant,)
Units 1 & 2))

Docket Nos. 50-400 OL
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CERTIFICATION OF COUNSEL

I hereby certify that I have made the following efforts to resolve Applicants' objections to certain of Wells Eddleman's Interrogatories (First Set) dated March 21, 1983, on Contention 45.

John O'Neill and Hill Carrow spoke with Mr. Eddleman on April 8, 1983, to discuss in general terms the substance and nature of Applicants' objections. Mr. Eddleman and I later discussed these issues in more depth by telephone on May 27, 1983.

Applicants understand Contention 45 as it was admitted by the Board to address the adequacy of the actual design of the ECCS, feedwater, and main steam systems. They believe therefore that information relating to the early design stages of these systems is irrelevant to the issue of the adequacy of their actual design. Mr. Eddleman has not agreed with this position but it is my understanding that we will continue to discuss this issue in light of the answers Applicants have provided in response to Mr. Eddleman's Interrogatories on Contention 45. Applicants have provided information concerning early design stages if it was not burdensome to do so.

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Answers to Wells Eddleman's Request for Production of Documents (Contention 45)" and "Certification of Counsel" have been served by deposit in the United States Mail, first class prepaid, addressed to the parties listed below this the 3rd day of June, 1983.

James L. Kelley, Esquire
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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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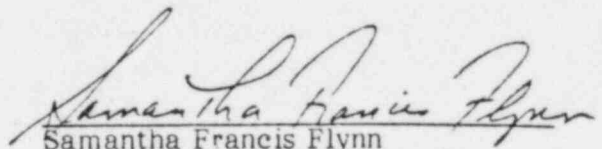
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