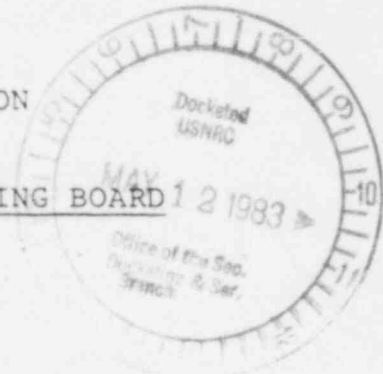


May 11, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
CAROLINA POWER & LIGHT COMPANY) Docket No. 50-261-OLA
)
(H. B. Robinson Steam Electric) ASLBP No. 83-484-03LA
Plant, Unit 2))

APPLICANT'S FIRST SET OF INTERROGATORIES
TO HARTSVILLE GROUP

The following interrogatories are addressed to Hartsville Group Contention 3.

1(a). In support of its contention that the retirement of Robinson 2 would be cost-beneficial, does Hartsville Group intend to rely on any model or cost-benefit analysis methodology other than the Cost Assessment of Nuclear Substitution model (hereinafter ESRG model) contained in the October, 1982, Study of the Economics of Closing the Indian Point Nuclear Power Plants prepared by Energy Systems Research Group, Inc.?

(b). If so, identify any such model or methodology and the document, study or report in which it is contained, and either furnish any such documents, studies or reports to Applicant's counsel or make any such documents, studies or reports available to Applicant for copying.

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2. With respect to Hartsville Group's contention that application of the ESRG model would show that the proposed steam generator repair to keep Robinson 2 operating is not cost-effective:

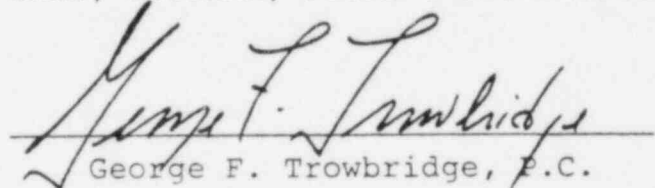
- (a) Have any written calculations been made by or on behalf of Hartsville Group applying the ESRG model or any comparable model or cost-benefit analysis methodology to the retirement of Robinson 2?
- (b) If the answer to (a) is yes, either furnish to Applicant's counsel or make available for copying by Applicant any such calculations.
- (c) Has Hartsville Group engaged the services of ESRG or any other consultant to perform such calculations? Identify any such consultant.
- (d) If the answer to (c) is no, does Hartsville Group plan to engage the services of ESRG or any other consultant to perform such calculations? Identify any such consultant.
- (e) Does Hartsville Group have within its membership any individual or individuals qualified to make such calculations? If so, identify the individual or individuals and describe his or their qualifications.

- (f) Provide the principal assumptions to be used by Hartsville Group as input for the ESRG model or other model or methodology. These include, without limitation, the assumed capacity factor for Robinson 2, the assumed CP&L system load growth, the assumed nuclear fuel and fossil fuel costs, the assumed nuclear and fossil plant operating and maintenance costs, and the assumed availability, source and cost of replacement power.
- (g) Identify any documents, studies or reports on which Hartsville Group will rely in selecting such principal assumptions. Furnish to Applicant's counsel or make available for copying by Applicant all such documents, studies or reports.

In accordance with the Licensing Board's Memorandum and Order dated April 12, 1983, responses to this discovery request are due within 45 days after receipt thereof.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE


George F. Trowbridge, P.C.

Dated: May 11, 1983

May 11, 1983

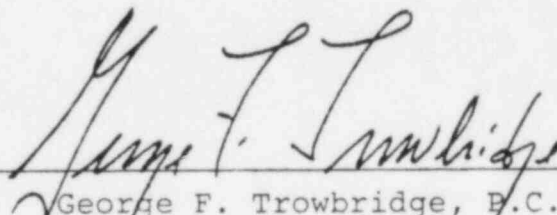
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H. B. Robinson Steam Electric)	ASLBP No. 83-484-03LA
Plant, Unit 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's First Set of Interrogatories to Hartsville Group," dated May 11, 1983, were served upon those persons on the attached Service List, by deposit in the United States mail, postage prepaid, this 11th day of May, 1983.


George F. Trowbridge, B.C.

Dated: May 11, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261
)	(Steam Generator
(H. B. Robinson Steam Electric)	Repairs)
Plant, Unit 2))	

SERVICE LIST

Administrative Judge Morton B. Margulies
Chairman, Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge Jerry R. Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge David L. Hetrick
Atomic Safety and Licensing Board
Professor of Nuclear Engineering
University of Arizona
Tucson, Arizona 85721

Docketing & Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Myron Karman, Esquire
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

B. A. Matthews
Hartsville Group
P. O. Box 1089
Hartsville, South Carolina 29550

Dr. John C. Ruoff
P. O. Box 96
Jenkinsville, South Carolina 29065

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Samantha Francis Flynn, Esq.
Carolina Power & Light Company
P. O. Box 1551
Raleigh, North Carolina 27602