

August 18, 1983

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BOARD

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	)	
Plant, Unit 2)	)	

APPLICANT'S OBJECTIONS TO HARTSVILLE GROUP'S  
SECOND SET OF INTERROGATORIES AND  
REQUESTS TO PRODUCE

Applicant objects to the following interrogatories included in Hartsville Group's Second Set of Interrogatories, served August 1, 1983, for the reasons stated below.

Interrogatory 3-24.

This interrogatory relates to sleeving, an alternative method of repairing steam generators. Sleeving is not put into issue as an alternative by Contention 3, which is -- by its express terms -- limited to the alternative of retirement. The interrogatory is thus beyond the scope of the contention, and irrelevant. See "Applicant's Objections To Hartsville Group's First Set of Interrogatories and Requests To Produce" (June 30, 1983), at 5, and "Applicant's Answer To Hartsville Group's Motion To Compel" (August 15, 1983), at 15-17.

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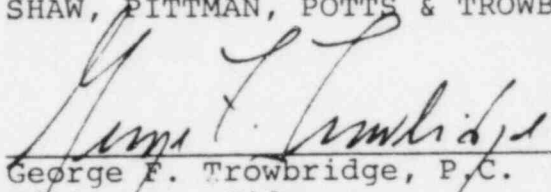
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Interrogatories 3-27 and 3-30.

Applicant continues its objection to interrogatories (such as these) to the extent that they would require Applicant to perform new studies or calculations. However, the commitment by Applicant's counsel in the August 1, 1983 letter to the representative of the Hartsville group with respect to new studies and calculations which may hereafter be made by Applicant applies equally to the studies and calculations requested in the second set of interrogatories.

Respectfully submitted

SHAW, PITTMAN, POTTS & TROWBRIDGE

  
George F. Trowbridge, P.C.  
Delissa A. Ridgway

Counsel for Applicant

Dated: August 18, 1983

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CAROLINA POWER & LIGHT COMPANY	)	Docket No. 50-261-OLA
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Plant, Unit 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Objections to Hartsville Group's Second Set of Interrogatories and Requests to Produce" were served this 18th day of August, 1983 by deposit in the U.S. mail, first class, postage prepaid, to all persons on the attached Service List.

  
\_\_\_\_\_  
Delissa A. Ridgway

Dated: August 18, 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)	)	

SERVICE LIST

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Atomic Safety and Licensing Appeal  
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