July 26, 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)	)	

APPLICANTS' ANSWER TO INTERVENOR
EDDLEMAN'S MOTION TO COMPEL DISCOVERY
RE EDDLEMAN 29 AND 37B

In a Motion to Compel dated July 11, 1983, Wells Eddleman asks the Licensing Board to require Applicants to respond to all but one interrogatory or part thereof to which Applicants objected in their June 17, 1983 Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 29 and 37B to Applicants Carolina Power & Light Company, et al. (Second Set) ("Applicants' Responses"). Recognizing the Licensing Board's preference that parties not file answers to motions to compel, Applicants have chosen not to respond to Mr. Eddleman's arguments on Interrogatory 29-1(g) with respect to

cost, Interrogatories 29(d) through 29(g) regarding Appendix R (fire protection), and Interrogatories 37B-3(g) and (h), concerning health effects not caused by radiation; we instead rely on our objections as stated in Applicants' Responses. However, with respect to the other interrogatories to which objections have been raised, Applicants do feel constrained to address arguments advanced by Mr. Eddleman for the first time in his Motion to Compel.

Generally, Applicants recognize that in NRC proceedings, pretrial discovery is liberally granted. See South Carolina Electric and Gas Company, et al. (Virgil C. Summer Nuclear Station, Unit 1), ALAB-642, 13 N.R.C. 881, 888-89 (1981), citing Pennsylvania Power and Light Co. (Susquehanna Steam Electric Station, Units 1 and 2), ALAB-613, 12 N.R.C. 317, 322 (1980), Pacific Gas and Electric Co. (Stanislaus Nuclear Project, Unit 1), LBP-78-20, 7 N.R.C. 1038, 1040 (1978), and Hickman v. Taylor, 329 U.S. 495, 501 (1947). Consistent with this principle, Applicants' Responses provided a very considerable amount of information to Mr. Eddleman notwithstanding Applicants' doubts about the relevance of much of the information. Applicants direct the Board's attention to this fact not because it provides an independent basis for denying Mr. Eddleman access to information to wnich he is entitled, but because we believe that a review of Applicants' Responses establishes their willingness to meet the Commission's broad discovery rules. There were only a very limited number of

instances where Applicants objected to Mr. Eddleman's interrogatories. Applicants raised objections only where the interrogatory appeared to be so beyond the scope of the contention that the question was considered to be unreasonable, or the effort required to obtain the information was judged to be unreasonably burdensome.

1. Interrogatory 29-1(g) (in part). In addition to asking about the cost of all radioiodine monitoring equipment to be used at the Harris facility, in response to which Applicants rely on their objection as stated in Applicants' Responses at 20, in Interrogatory 29-1(g) Mr. Eddleman also asks for the model number, type and manufacturer of all such equipment. Applicants have partially answered this interrogatory by providing Mr. Eddleman with information about environmental samplers. See Applicants' Responses at 20. However, as stated in Applicants' Responses, Applicants do not have the requested information on in-plant monitors in the form requested. Applicants can identify GA Technologies as the vendor from whom Applicants, through its agent, Ebasco Services, Inc., have purchased various kinds of monitoring equipment. Some monitoring equipment has not yet been purchased. The purchased equipment is required to meet certain specifications; however, the specific model number and type of equipment would not be stated on either the specifications for the equipment, or on the purchase contract between Ebasco and the vendor. Thus, the information would have to be specially requested from the

vendor. Very little of this equipment has been delivered to Applicants -- the monitoring system is one of the last systems installed; it is not put in place while heavy construction activities are still ongoing. Prior to plant operation, Applicants will have obtained this detailed information; however, we simply do not have it now.

Applicants referred Mr. Eddleman to Chapters 11 and 12 of the FSAR because information about the quality of the equipment, e.g., sensitivity and range, and about the location of the equipment, is set forth there. In Applicants' view, this information is responsive to Mr. Eddleman's inquiry because it indicates the nature of the monitoring system Applicants will use at the Harris facility. Moreover, without any basis asserted for challenging the adequacy of any particular type of monitoring equipment, Mr. Eddleman's request for this information, which is of questionable relevance to begin with, ought to be denied.

2. Interrogatory 29-1(j)(ii), (iii) and (iv). Applicants do not understand how the monitoring equipment and practices at other nuclear facilities has any relevance to Contention 29/30. The unreasonable scope of such an inquiry is unjustified, in the absence of some substantial reason for pursuing the separate issue of other licensees' ability to comply with Appendix I. As discussed below, the specific arguments advanced by Mr. Eddleman do not support the need for such a broad-sweeping inquiry. Applicants also note their

particular concern about this interrogatory, and others like it, because of the potential for this kind of inquiry about every other nuclear facility in the country to lead to a further expansion of what, based on Mr. Eddleman's interpretation, is already an unmanageably broad contention.

In his Motion to Compel, Mr. Eddleman makes various statements which he considers to be self-evident propositions, including: (1) "Certainly if other plants have continuous radioiodine monitors and Harris does not, the reasons why Harris does not are relevant"; and (2) "Whether Harris has better, worse, or the same monitors for radioiodines as do other plants is surely relevant to Harris' ability to control radioiodine releases, at least as compared to those other plants' ability." Motion to Compel at 4. Not only are these statements not self-evident, but Applicants disagree with them. With respect to the first statement, Applicants' motives in choosing its monitoring system and procedures has no relevance whatsoever to the question of whether Appendix I compliance has been demonstrated. Similarly, regardless of the equipment utilized at other facilities -- "better, worse, or the same" -- the use of this equipment elsewhere does not establish Applicants' compliance with Appendix I, nor does it establish Applicants' inability to so comply. Finally, and perhaps most importantly, Contention 29/30 is not a monitoring contention. See Licensing Board Memorandum and Order (Reflecting Decisions Made Following Prehearing Conference), September 22, 1982, at

46-47. For Mr. Eddleman to pursue, in the name of Appendix I, the historical operating experience of each and every monitor to be used at the Harris facility is in itself an entire subject separate and apart from the issue of Appendix I compliance.1/ These interrrogatories also constitute a fishing expedition, absent some suggestion by Mr. Eddleman that a particular component or system has had mechanical difficulties of a dimension and frequency such that it cannot be relied upon at the Harris facility. Mr. Eddleman has not suggested that he has any basis whatsoever for challenging the operability of the Harris monitoring systems. While Applicants recognize that Mr. Eddleman must be afforded, through discovery, a reasonable opportunity to develop his case, asking broad-sweeping questions of dubious relevance to a broadly stated contention is not reasonable. See Duke Power Company, et al. (Catawba Nuclear Station, Units 1 and 2), Memorandum and Order (Ruling on Various Discovery Disputes), December 22, 1982, at 12.

In sum, because the scope of Contention 29/30 could be virtually unlimited were Applicants to accede to Mr. Eddleman's request for such information, Applicants vigorously object to Interrogatory 29-1(j).2/

1/ While Applicants recognize the nexus between the adequacy of monitoring equipment and establishing Appendix I compliance, there is almost always some nexus between all of the issues in OL proceedings, where all issues relate to safe operability of the facility. Applicants have found Mr. Eddleman to be unable to disconnect one issue from the myriad of other issues which are tangentially related to it, as illustrated by Interrogatory 29-1(j).

2/ Applicants have not gone through the considerable effort to ascertain whether anyone in Applicants' employ, or working

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3. Interrogatory 29-4(o). Interrogatory 29-4(o) is really a series of interrogatories. Having asked Applicants to provide answers to a number of interrogatories, 29-4(e) through (n), about the Harris facility, in Interrogatory 29-4(o), Mr. Eddleman then asks Applicants to provide the same information about the Robinson 2 plant. Applicants provided answers to Interrogatories 29-4(e) through (n); however, we object to Interrogatory 29-4(o).

Applicants' general objection to Interrogatory 29-4(o) is similar to the objection to Interrogatory 29-1(j): the Robinson 2 plant's ability or inability to comply with Appendix I does not establish or refute Applicants' Appendix I calculations for the Harris facility, or the adequacy of Applicants' means of establishing Appendix I compliance once the Harris facility is operating. Contention 29/30 is limited to the issue of the Harris facility's compliance with Appendix I; it does not encompass other facilities' compliance history.

Moreover, with respect to the specific information sought by Mr. Eddleman about Robinson 2, Applicants do not believe the Robinson 2 technical specifications or operating history are

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for an agent of Applicants, such as Ebasco, has information responsive to Interrogatory 29-1(j). This is because Applicants strongly object to this subject area as irrelevant to the litigation of Contention 29/30. Because we have not made this determination, Applicants were not and are not in a position to provide a "We don't know" answer, one of the suggestions made by Mr. Eddleman. See Motion to Compel at 5.

relevant because Robinson 2 is a much older facility than SHNPP. Because it is a plant of a different vintage, the equipment is different, the basis for its technical specifications is different -- they were established without the benefit of the standard Westinghouse technical specifications -- and its fuel is different. Thus, notwithstanding the fact that both plants are 3-loop Westinghouse PWRs, as Mr. Eddleman notes, there is no basis for comparing expected releases or leakage requirements.

Mr. Eddleman argues that Robinson 2's technical specifications for leakage, on which these interrogatories focus, are relevant because "any violations of them or inadequacies in them . . . is relevant to whether Applicants will actually carry out proper control of radioiodines at the next PWR they operate (Harris)." Motion to Compel at 6. Applicants disagree. It would take many, many hypothetical "ifs" to establish any connection between a violation of a technical specification on primary to secondary leakage at Robinson 2, on the one hand, and the ability of the Harris facility to comply with Appendix I, on the other. One of the links in such a chain of events would involve an inquiry into the competence of operations personnel and management at both facilities. Not only has no basis been provided for getting into this long and hypothetical chain of events, but the nexus between these two events is so attentuated that causation -- viz., proximate cause -- is lacking. Furthermore, had Mr. Eddleman proferred a

contention which suggested this chain of events, which Contention 29/30 does not, he would really be inquiring into management competence at the Harris facility, not Appendix I compliance. In Applicants' view, the pursuit of this information is irrelevant, does not appear reasonably calculated to lead to the discovery of admissible evidence and, consequently, is impermissible.

Mr. Eddleman also argues that recurrence at the Harris facility of specific problems at the Robinson plant, e.g., steam generator leaks and primary coolant pump seal failures, could lead to high radiation releases. Motion to Compel at 6. While this may or may not be true, these events, analyzed in Chapter 15 of the FSAR, are accidents; accordingly, they are not governed by Appendix I unless the leakage is very low. If leakage is low, the equipment will not be challenged in the manner suggested by Mr. Eddleman. Thus, the possibility of uncontrolled leakage, alluded to by Mr. Eddleman, is beyond the scope of Contention 29/30. Furthermore, to assume as a predicate to this inquiry, without any foundation whatsoever, that such hypothetical events will occur at Harris is unreasonable and wholly tangential to the issue of Appendix I compliance.

4. Interrogatory 29-6(f)(iii), (iv), (xiii), (xiv), (xv) and (xvi). Interrogatory 29-6(f) asks for a great deal of information about mounting or sealing gaskets, frames and devices to be used in connection with radioiodine-absorbing filters and other devices used to remove or trap gaseous or liquid

radioiodines (or particulates) from effluent streams at the Harris facility. See Applicants' Responses at 59; Motion to Compel at 6-9. Applicants provided to Mr. Eddleman a substantial amount of the information he requested in Interrogatory 29-6(f)(i)-(xviii). See Applicants' Responses at 60-63. However, with respect to six subparts of this interrogatory, Applicants objected.

Applicants consider the name of the manufacturer(s) of all sealing gaskets, the dimensions of such components, the design life, anticipated replacement schedules and personnel exposures to be information of no probative value to resolution of Contention 29/30. Mr. Eddleman appears to interpret the contention as, in part, a challenge to the reliability and design of Applicants' monitoring equipment. As previously stated, Contention 29/30 was not admitted as a monitoring contention.

To the extent Mr. Eddleman is concerned about a particular effluent pathway, he has available to him diagrams of these pathways and could have asked about a monitor in a specified location. See FSAR Chapter 11. He did not choose to do so, instead requesting a monumental quantity of material of questionable relevance.

The inappropriateness of this inquiry is further evidenced by one of Mr. Eddleman's arguments in his Motion to Compel. Applicants consider it unreasonable to view this contention as does Mr. Eddleman, as encompassing the issue of whether high radioiodine releases with resultant greater exposures in the

plant will cause deferral of needed repairs because of the unavailability of a sufficient number of maintenance personnel to account for this possibility, which will cause unreliable equipment to be used. Nevertheless, characteristically, Mr. Eddleman argues that this series of hypothetical events does fall within the scope of Contention 29/30. See Motion to Compel at 9.3/

5. Interrogatory 37B-1(c) and (d). Notwithstanding Mr. Eddleman's suggestion to the contrary, discovery rules do not require Applicants to respond to Mr. Eddleman's blanket request for all information in Applicants' possession concerning, in effect, all aspects of the issue of health effects of radiation as it pertains to the licensing of the Harris facility. See Hickman v. Taylor, supra, 329 U.S. at 507; Illinois Power Company (Clinton Power Station, Unit Nos. 1 & 2), ALAB-340, 4 N.R.C. 27, 34 (1976) citing 4A Moore's Federal Practice, 2d ed., par. 34.07. Such a request is unduly broad, and represents an impermissible attempt to shift Mr. Eddleman's burden of case preparation to Applicants. Cf. Duke Power Company, et al. (Catawba Nuclear Station, Units 1 and 2), Memorandum and Order (Rulings on Motion to Compel), April 18, 1983, at 2.

3/ In this regard, Applicants note that while radioiodine releases from the normal cleanup system are in Mr. Eddleman's view "relevant to the question of whether the Harris plant can limit their release adequately," Motion to Compel at 7, this statement assumes the such releases are not contained -- a major assumption to begin with. It also assumes that such releases are significant, viz., not within anticipated levels.

With respect to Interrogatory 37B-1(d), not only would Applicants have to review every document in their possession which may address the health effects of radiation -- the request posed in Interrogatory 37B-1(c) -- but Applicants then would have to review all of these materials to determine what, if any, diseases are discussed in them. Applicants object to the unreasonable breadth of such a request. We also believe this effort would constitute extensive independent research in which a party is not required to engage. Pennsylvania Power & Light Company, et al. (Susquehanna Steam Electric Station, Units 1 and 2), ALAB-613, 12 N.R.C. 317, 334 (1980); Boston Edison Company, et al. (Pilgrim Nuclear Generating Station, Unit 2), LBP-75-30, 1 N.R.C. 579, 584 (1975).

6. Interrogatory 37B-2. In this interrogatory, Mr. Eddleman asks for information Applicants have with respect to documents cited by Mr. Eddleman in his response to Applicants' first round of interrogatories on Contention 37B. To the extent Mr. Eddleman provided only partial citations to the studies on which he may rely to support Contention 37B, Applicants accordingly have been limited in their ability to respond to this request. In an effort to minimize discovery disputes, Applicants have endeavored to partially answer this interrogatory. In order for the answer to be clear, we have attached hereto as Appendix 1 a list of citations, some complete and some incomplete, which counsel has asked Mr. William H. Webster, Manager, Radiological & Chemical Support for the

Harris facility, to review for purposes of answering this interrogatory. Applicants note that, with respect to the major vague references made by Mr. Eddleman, we have asked follow-up interrogatories of Mr. Eddleman in order to clarify these citations. See Applicants' Interrogatories and Request for Production of Documents to Intervenor Wells Eddleman (Fifth Set) (Eddleman Contentions 29/30 and 37B), July 20, 1983, at 25-26.

To Mr. Webster's knowledge, Applicants have made no studies of the references included in Appendix 1, nor do Applicants possess any such studies done by others. Applicants note that, in the course of trial preparation, we will rely on consultant(s) hired in anticipation of litigation of Contention 37B and, eventually, on designated witness(es), to respond to Contention 37B. In the course of such trial preparation and testimony preparation, Applicants may discover studies which address the references cited in Appendix 1. If so, Applicants will update this interrogatory response. However, to the extent Applicants' consultants, witnesses or counsel prepare their own critiques of Mr. Eddleman's references as a part of trial preparation, such efforts clearly fall within the trial preparation and/or the work product exception to the general rules of discovery. See 10 C.F.R. § 2.740(b)(2); Rule 26(b)(3) of the Federal Rules of Civil Procedure and Notes of Advisory Committee on Rules with respect to Subdivision (b)(3) (West Publishing Co. 1982) at 73-75 ("The requirement of a special showing for discovery of trial preparation materials reflects

the view that each side's informal evaluation of its case should be protected, that each side should be encouraged to prepare independently, and that one side should not automatically have the benefit of the detailed preparation work of the other side."). Mr. Eddleman's claim of substantial need is insufficient to overcome this exception. See Motion to Compel at 11. To the extent Mr. Eddleman is burdened because he has chosen to litigate so many contentions in this proceeding, Applicants are not required to compensate for this burden by assisting Mr. Eddleman in the preparation of his case on Contention 29/30. Cf. Duke Power Company, et al. (Catawba Nuclear Station, Units 1 and 2), Memorandum and Order (Rulings on Motion to Compel), April 18, 1983, at 2 (interrogatory "represents an impermissible attempt to shift [intervenor's] burden of case preparation to the Applicants"). While Mr. Eddleman points out that he is intervening pro se, Motion to Compel at 11, his status also does not relieve him of his responsibilities as a party to this proceeding, nor shift those responsibilities to Applicants. See Commission Statement of Policy in Conduct of Licensing Proceedings, CLI-81-8, 13 N.R.C. 452, 454 (1981).

Finally, Applicants do continue to object to Mr. Eddleman's inquiry as to whether and when Applicants obtained copies of documents referred to by him in his interrogatory response. The answers to such questions simply have no bearing on Contention 37B. While Mr. Eddleman may have more or less

confidence in the strength of his position based on Applicants' answers to such questions, the timing of Applicants' preparation is irrelevant to litigation of Contention 37B. Moreover, Mr. Eddleman has not offered any basis for believing that the answers to such questions are reasonably calculated to lead to relevant information. See 10 C.F.R. § 2.740(b)(1).

7. Interrogatories 37B-3(a)-(e) and (k). Applicants objected to Interrogatories 37B-3(a) to (d) insofar as Mr. Eddleman sought information beyond that provided by Applicants. Applicants in fact made an effort to answer these interrogatories by expressing their method of analysis of health effects caused or enhanced by radiation. See Applicants' Responses at 70-71. To the extent Mr. Eddleman seeks a catalogue of diseases, see Interrogatory 37B-3(e) and (k), Applicants have not done this research effort, nor do Applicants believe that this request is reasonable. If Mr. Eddleman is interested in particular diseases which he believes may be linked to radiation, he should identify those diseases. Applicants are not obligated to conduct this kind of sweeping analysis for Mr. Eddleman. See Susquehanna, supra, ALAB-613, 12 N.R.C. at 334; Pilgrim, supra, LBP-75-30, 1 N.R.C. at 584.

In response to Interrogatories 37B-3(a), (b), (c) and (d), Applicants note that the health effects of radiation are not analyzed in Applicants' Environmental Report for the Harris facility; rather, this is a subject addressed by the NRC Staff in the Draft Environmental Statement (April 1983) for the Harris

plant, pursuant to the NRC's responsibilities under the National Environmental Policy Act of 1969 and 10 C.F.R. Part 51 of the Commission's regulations.

For the reasons stated above, Applicants ask the Board to deny Mr. Eddleman's Motion to Compel dated July 11, 1983.

Respectfully submitted,

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Dated: July 26, 1983

APPENDIX 1

Gen. Int. 5(a)

Bertell, Rosalie, "The Nuclear Worker and Ionizing Radiation," American Industrial Hygiene Association Journal 40. 395-401, 916-22 (May 1979).

Int. 37(B)-1

Gofman, Radiation and Human Health (1981).

"Inherited Disease," The Metabolic Basis of Genetic Diseases (5th Ed. 1983) at 35-59, 14, 15-16.

Heredity and Disease at 20-29, 30-76.

An ABC of Medical Genetics, 31-49, 54-60.

Jackson and Schimke, Eds., Clinical Genetics - A Source Book for Physicians (1979) at 33-244, 246-47, 261, 269-594.

Nyan and Sakati, Genetic and Malformation Syndromes in Clinical Medicine (1976).

Genetic Disorders of Man (1970) at 107-980.

Progress in Clinical and Biological Research, Vol. 32 (1978) at 27-306, 523-732, 746-47.

Porter, Heredity and Disease (1968).

UNSCEAR 1977 at 514-19, 520.

Harris, H., The Principles of Human Bio-Chemical Genetics (1980) at 441-68.

Auerbach F.R.S., Genetics in the Atomic Age (1965) at 88-106.

ICRP Publication 18 (1972) at 28-29, 32-33.

McCusick, V.A., Mendelian Inheritance in Man (1978) at 850.

Edwards, J.H., "Cost of Mutation," Genetic Damage in Man Caused by Environmental Agents (1979) at 465-83.

Cellular Basis and Aetiology of Late Somatic Effects of Ionizing Radiation at 313-16 (Lindop and Rotblat); 285-94 (Upton, Kastenbaum, Conklin); 273-75 (Mole) and 7, 17, 23, 25.

UNSCEAR 1962.

UNSCEAR 1966.

Trimble and Doughty, "The Amount of Hereditary Disease in Human Populations," Annals of Human Genetics (London) 38:199-223 (1974).

Stevenson, A.C., "The Load of Hereditary Effects in Human Populations," Radiation Research Supplement 1:306-25 (1959).

Vogel and Rathenberg, "Spontaneous Mutation in Man," Advances in Human Genetics 5:223-318 (1975).

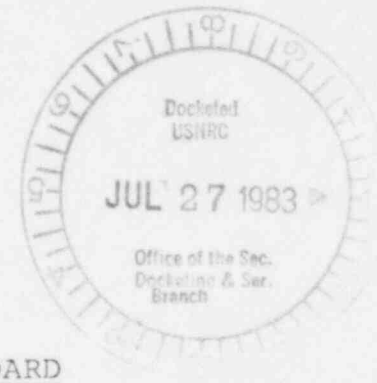
Morgan, Bulletin of the Atomic Scientists (September 1978).

Bross and Driscoll, "Direct Estimates of Low-Level Radiation Risks of Lung Cancer at Two NRC-Complaint Nuclear Installations: Why Are the New Risk Estimates 20 to 200 Times the Old Official Estimates?" Yale Journal of Biology and Medicine 54:317-28 (1981).

Rossi, H.H., Yale Journal of Biology and Medicine 54:340-41 (1981).

BEIR-III.

July 26, 1983



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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Answer to Intervenor Eddleman's Motion to Compel Discovery Re Eddleman 29 and 37B" were served this 26th day of July, 1983, by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Deborah B. Bauser
Deborah B. Bauser

Dated: July 26, 1983

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