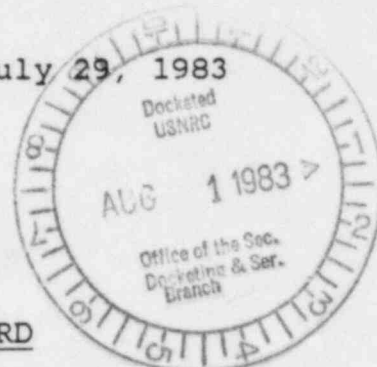


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

July 29, 1983



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 PROPOSED CONTENTIONS
ON THE DETAILED CONTROL ROOM DESIGN REVIEW
(DCRDR) PROFFERED BY INTERVENOR WELLS EDDLEMAN

By a pleading dated July 2, 1983, Intervenor Wells Eddleman proposed new contentions relating to Applicants' Detailed Control Room Design Review ("DCRDR") and sought to provide additional justification for proposed contentions previously offered in a pleading dated January 8, 1983. For the reasons set forth in detail below, Applicants Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby oppose admission of all such contentions proffered by Mr. Eddleman relating to the DCRDR.

BACKGROUND

The Board already has before it the following documents filed either by Applicants, the Staff or Mr. Eddleman regarding this issue:^{1/}

1. "Human Factors Design Evaluation Report for the Shearon Harris Unit 1 Control Room," dated January 23, 1981 (hereinafter "DCRDR Report") (provided to the Chairman by cover of letter dated January 21, 1983).
2. "Wells Eddleman's Motion Concerning DCRDR Information," dated January 8, 1983 (hereinafter "January 8 pleading").
3. "Applicants' Response to Intervenor Wells Eddleman's Motion concerning DCRDR Information and Proposed New Contentions," dated January 25, 1983.
4. "Wells Eddleman's Answer to Applicants' Response to Motion Concerning DCRDR Information And Proposed New Contentions," dated January 26, 1983.
5. "NRC Staff Response to Motion of Wells Eddleman to Admit Additional Contentions," dated January 28, 1983.
6. Letter from E. E. Utley, Executive Vice President, CP&L, to H. R. Denton, Director, NRR, dated April 15, 1983, enclosing Applicants' schedule for compliance with NRC Generic Letter 82-33, Supplement 1 to NUREG-0737.

^{1/} Intervenor Richard Wilson had previously filed a proposed contention relating to the DCRDR. He did not, on or before July 1, 1983, file a new, amended or revised contention or a statement that he desired to litigate his previously proffered contention. Applicants presume that he does not desire to pursue this issue. See Tr. 605 (Prehearing Conference, ruling of Chairman Kelley).

7. Letter from E. E. Utley to H. R. Denton, dated June 1, 1983, enclosing Applicants' supplemental information to the DCRDR Report (hereinafter "June 1 Supplement").
8. "Wells Eddleman's Response to 1983 Updated DCRDR Including Revised and New Contentions," dated July 2, 1983 (hereinafter "July 2 pleading").

The DCRDR Report was originally filed with the NRC Staff on December 7, 1982.^{2/} On December 17, 1982, the NRC's Office of Nuclear Reactor Regulation issued Generic Letter No. 82-33, Supplement 1 to NUREG-0737. The purpose of Supplement 1 to NUREG-0737 is, inter alia, to provide additional clarification regarding DCRDR's. Enclosures to Supplement 1 to NUREG-0737 set forth certain requirements that must be met by all licensees and list guidance documents which establish acceptable means for meeting those requirements.

The DCRDR Report discusses the human factors engineering evaluation of the Harris Unit 1 control room design. This evaluation was conducted between April 1980 and January 1981, and consisted of a review of all available design documentation and a survey of the Harris simulator. It included a review of human engineering requirements specifications, the main control board design, annunciators, work space, systems operation

^{2/} Copies of the DCRDR Report were filed with certain lead intervenors and the public documents rooms in Chapel Hill and Wake County, North Carolina, pursuant to procedures for service of documents then in effect.

analysis and emergency procedures review. A number of recommendations were made to improve the control room design and layout. Based on the DCRDR, the Harris Unit 1 control room design and layout were substantially revised. The DCRDR Report was prepared based on NRC guidance documents then available.

The new contentions proposed by Mr. Eddleman on January 8, 1983, simply used the recently promulgated Supplement 1 to NUREG-0737 to critique Applicants' DCRDR Report. Applicants noted in response to the new contentions that Applicants had not yet had an opportunity to address the new requirements. Supplement 1 to NUREG-0737 established April 15, 1983 as the date by which Applicants were to submit a schedule for compliance to the NRC Staff. At the prehearing conference held on February 24, 1983, Applicants and the Staff urged that Mr. Eddleman be given an opportunity, upon reviewing the Applicants' April 15 filing, to amend, revise or reassert his contentions on the DCRDR. The Board agreed to this procedure. Tr. 589-605.

By letter dated April 19, 1983, Applicants forwarded to the Board the April 15 filing. Applicants indicated their intention to file a complete supplement to the DCRDR Report on or before June 1, 1983. In light of that schedule, Applicants proposed that the June 1 Supplement serve as the "trigger" for amended, revised or reasserted contentions on the DCRDR. The Board agreed. See Memorandum and Order (Ruling on Cost Savings

Contentions, Discovery Disputes, and Scheduling Matters), dated May 27, 1983, at 25.

The June 1 Supplement describes in more detail the methods and procedures that were used in conducting the DCRDR, the review team and the qualifications of its members, and the resolution of the recommendations that were made in the DCRDR Report. The DCRDR Report and the June 1 Supplement meet the requirement in Supplement 1 to NUREG-0737 (at § 5.2(b)) for submittal of a "summary report" outlining proposed control room changes as a result of the DCRDR.

Mr. Eddleman's July 2, 1983 filing addresses Applicants' June 1 Supplement. Applicants' Response is filed pursuant to the schedule established by Judge Bright.^{3/}

ARGUMENT

Applicants have recently set forth in detail their position on the standards governing the admissibility of late filed contentions. See "Applicants' Response to Contentions of Intervenor Wells Eddleman Relating to the Draft Environmental Statement," dated July 8, 1983, at 6-14. Applicants will not repeat here the discussion on clarity and basis with specificity, which is relevant to the Board's decision regarding the

^{3/} Staff counsel informed Applicants' counsel that Judge Bright, in the Chairman's absence, had extended the due date for Applicants' and the Staff's responses to Mr. Eddleman's new contentions to July 29, 1983.

DCRDR Contentions. The Board directed Mr. Eddleman to address the five lateness factors, 10 C.F.R. § 2.714(a)(1), in a filing due on August 31, 1983. See Memorandum and Order (Memorializing Telephone Conference Call), dated July 15, 1983, at 3. Applicants will file any response to Mr. Eddleman's arguments in this regard, including arguments regarding lateness in his July 2 pleading, on or before September 9, 1983, pursuant to the schedule established by the Board. Id.

Applicants will address each of Mr. Eddleman's proposed contentions seriatim below. As a general comment, we note at the outset that Mr. Eddleman has not identified a single specific concern regarding the control room design; rather he demands that Applicants prove to his satisfaction that they have met new regulatory requirements. Where Applicants have committed to comply with regulatory requirements, Mr. Eddleman demands nevertheless that the issue be litigated simply because he does not "trust" Applicants to do what they commit to do. However, he need not "trust" Applicants. The NRC is responsible for ensuring that Applicants comply with applicable regulations and the NRC has enforcement power to ensure compliance.^{4/} The adjudicatory process is not meant to substitute for, or oversee, the Staff's inspection responsibilities -- some of

^{4/} For example, NRR will be conducting an audit of the Harris DCRDR in August.

which are directed at activities not intended to be completed, or which cannot be completed, on a schedule compatible with the pre-license hearing.^{5/}

Furthermore, if lack of trust could be sufficient basis for a contention, there would be no limit to the issues that would be litigated, as long as future acts were required of Applicants. Mr. Eddleman must plead a contention with clarity and support it with adequate basis and specificity. This he has not done. Mr. Eddleman offers instead sweeping generalized assertions regarding Applicants failure to demonstrate that they meet regulatory requirements. Such statements are not litigable contentions.

Contention 132B (Safety Parameter Display System)

132B The design of the Harris Unit 1 control room does not comply with the requirements of NUREG-0737, revision 1, dated 12-17-82, particularly the Safety Parameter Display System (SPDS) requirement.

January 8 pleading at 4; see also July 2 pleading at 5.

Mr. Eddleman alleges that the design of the Harris Unit 1 control room does not provide for a Safety Parameter Display

^{5/} The Commission earlier this year denied a rulemaking petition which sought to inject the adjudicatory process into the later licensing/inspection role of the Commission and Staff. The Commission noted that "as to all matters of public health and safety, the licensing boards' findings are predictive" rather than based on "demonstrated performance." 48 Fed. Reg. 16691, 16692 (April 19, 1983).

System ("SPDS"). Mr. Eddleman asserts in his July 2 pleading (at 5) that Applicants in the June 1 Supplement "again make no mention of the SPDS in the control room design review update." Thus he concludes: "Applicants have not shown that they even have a plan for an SPDS for Harris."

Applicants have committed to install an SPDS that meets the requirements of Supplement 1 to NUREG-0737. This commitment was made in Applicants' April 15 letter, where Applicants reported the status of compliance with this requirement to the NRC Staff:

A Purchase Order to provide the hardware, software, and analysis for an SPDS has been placed and the conceptual design will be completed by May 1983. Carolina Power & Light Company anticipates submittal of the SPDS safety analysis by September 1983. SPDS is expected to be operable, and training will be complete by April 1985, before fuel load in June 1985.

Mr. Eddleman may have overlooked Applicants' April 15 letter. In any event, the issue raised by Mr. Eddleman in Contention 132B, and repeated as basis for other contentions, is moot.

Contention 132C (Qualifications of DCRDR Review Team)

132C Applicants have not established that the Essex Corp. review team had the appropriate multidisciplinary qualifications required by NUREG-0737, Rev. 1, section 5.1.b.(i) of 12-17-82 and the ability to use accepted human engineering principles, in the DCRDR.

January 8 pleading at 4; see also July 2 pleading at 6.

This contention faults Applicants for not establishing the multi-disciplinary qualifications of the Essex Corporation review team which prepared the DCRDR Report. There is no requirement that Applicants set forth in the DCRDR Report the specific qualifications of the review team members. Applicants, partially in response to Mr. Eddleman's contention, provided in the June 1 Supplement a description of the DCRDR evaluation team and the resumes of the Human Factors Evaluation Group, the Human Factors/Operations Support Group, and the Project Management/Nuclear Operations/Plant Engineering Design Group.^{6/} See June 1 Supplement at 4-1 to 4-4; Appendices A, B and C. The qualifications of the individual team members and the multi-disciplinary background of the individuals from both Essex Corporation and CP&L is readily apparent from their resumes. In fact, a number of the individuals employed by Essex Corporation contributed to the development of the human factors engineering guidelines that serve as the basis for NRC's new regulatory requirements.

Mr. Eddleman acknowledges that Applicants have provided the qualifications of the evaluation team, but weakly comments that the June 1 Supplement "fails to establish that they are

^{6/} CP&L employees were also part of the review team to bring to the effort operational experience and to complement the multi-discipline skill mix. See June 1 Supplement at 4-3 to 4-4; Appendix C.

'appropriate interdisciplinary qualifications' or to give any criteria for such a determination." July 2 pleading at 6. Mr. Eddleman has not suggested any lack of qualifications; he points to no weakness in the team's composition or experience. Mr. Eddleman has failed to address the information provided to him on the qualifications of the review team and has failed to provide a basis with specificity for the contention.

Contention 132C II (DCRDR Fails to Comply with Supplement 1 to NUREG-0737)

132C II CP&L's "DCRDR" and control room design fail to comply with NUREG-0737, Revision 1, sections 5.1(b)(ii), (iii), (iv), 5.1(c) and 5.1(d)

January 8 pleading at 5: see also July 2 pleading at 6.

In this contention, Mr. Eddleman uses the requirements of Supplement 1 to NUREG-0737 to critique Applicants' DCRDR and control room design. The examples cited in Contention 132C II (which is over two pages in length) are either incorrect or fail to support the allegation that the DCRDR and control room design "fail to comply" with regulatory requirements.

First, Mr. Eddleman states that "no function and task analysis was performed in the DCRDR." This is true. Such an analysis cannot be performed until procedures are written and the control room is completed and equipped. Applicants have committed to perform such an analysis. See June 1 Supplement at § 2.4; see also Applicants' response to Contention 132F

infra. Mr. Eddleman has not asserted any fact that would suggest that such an analysis will not be performed properly.

Second, Mr. Eddleman states that "[n]o comparison of the display and control room requirements of NRC with any inventory is in the 'DCRDR'." It is true that a final inventory has not yet been compiled since the control room is not yet constructed and equipped. A comparison between the final inventory and the displays and controls requirements will, as required by Section 5.1.b(iii), be performed after the control room has been completed. This fact does not provide the basis for a contention that the DCRDR and control room fail to comply with regulatory requirements. Mr. Eddleman has not asserted any fact that would suggest that such an inventory will not be completed and a comparison made as required.

Third, Mr. Eddleman alleges that the DCRDR does not address "the usefulness of audible alarm systems, information recording and recall capability at all." This is not true. Human Engineering Requirements Specifications ("HERS") were developed for, inter alia, annunciator system (including audible alarms), color codes for strip chart recorders, pens and pointers (information recording), computer systems (information recording and recall capability), and noise (audible alarms). See June 1 Supplement at § 2.5. A number of features could not be assessed at this time due to the early stage of construction, such as noise levels in the control room (to which

audible alarms contribute). However, the application of the HERS ensure that human factors engineering principles are considered in the design and construction of the control room with respect to systems such as those identified by Mr. Eddleman.

Fourth, based on what appears to be a cursory review of Figure 2 of the DCRDR Report (at 12), Mr. Eddleman launches into an criticism of the layout of the control room. See January 8 pleading at 5-6. (Applicants are unable to understand exactly what his problems with the layout are asserted to be.) What is clear is that Mr. Eddleman has ignored the detailed discussion in Appendix D to the DCRDR Report which describes the methodology used to take human factors engineering into account in the recommended layout of the control room. Appendix D describes how the original control room equipment arrangement presented visual and access problems that were corrected by the recommended changes as a result of the DCRDR. For example, one of Mr. Eddleman's criticisms appears to be that equipment panels #6 and #7 are hidden from operators by other panels. This was intentional as these two panels require little if any monitoring. See DCRDR Report at Appendix D, § 2.2b. Mr. Eddleman offers no analysis of the human factors engineering and operational considerations that went into the control room layout. His criticisms are without substance and offer no basis for his contention that Applicants fail to meet regulatory requirements.

Fifth, Mr. Eddleman also states that the DCRDR Report does not provide HERS for lighting and visual alarms. Again, this is not true. HERS have been developed for ambient illumination and annunciator systems. See June 1 Supplement at § 2.5. In fact, HERS are not required by Supplement 1 to NUREG-0737. Thus, any perceived deficiencies with HERS (which Mr. Eddleman has not stated with specificity) do not support a contention which asserts that the DCRDR and control room fail to meet regulatory requirements.

Sixth, Mr. Eddleman claims that the DCRDR fails to address or correct human engineering deficiencies ("HEDs"). This is not true. See June 1 Supplement at § 3.0 (Table 3-1 at Summary Report Section No. 3.4b); Attachment 2 at revised pages 5-6.

Finally, Mr. Eddleman claims that the DCRDR does not verify that each selected design improvement will provide the necessary correction. Applicants have verified that each design improvement will provide the necessary correction, and can be introduced in the control room without creating any unacceptable human engineering discrepancies. As stated in the June 1 Supplement, the Essex Corporation field project manager provided the first review and "verification." June 1 Supplement at 2-1. There is no requirement that this verification process be discussed in detail in the summary report.

In summary, none of the allegations made by Mr. Eddleman provide basis for a contention that the DCRDR and the control

room fail to comply with regulatory requirements. Contention 132C II must be rejected.

Contention 132D II (Harris Unit 2 Control Room Design)

132D II The Harris 2 control room has not been built in compliance with the requirements of NUREG-0737, Rev. 1, and applicable updates thereto, or of NUREG-0700. It has no emergency procedures. Failure to assure safe control room design and procedures for Unit 2 means that the public health and safety is not adequately protected. To assure compliance with the above, Unit 2's control room must be evaluated not only as it is built, but after it is completed -- to take care of remaining noncompliances or problems identified pursuant to NUREG-0737 Rev. 1 section 5.1 a, b, c, and d; and to assure an operable SPDS per sections 3.4 and 4 thereof.

July 2 pleading at 8.

Mr. Eddleman has withdrawn original Contention 132D which alleged that the DCRDR Report failed to address Unit 2. As stated in the cover letter which enclosed the June 1 Supplement:

The SHNPP-2 Control Room will essentially replicate the Unit 1 Control Room. Thus, this DCRDR is applicable to both units.

Contention 132D II is frivolous. It does not raise independently any issue that is not raised in the context of the other contentions which allege fault with the DCRDR. It should be rejected as redundant.

132E (Compliance with Sections 5.2.a. and 5.2.b. of Supplement 1
to NUREG-0737)

132E CP&L is wrong in stating that its DCRDR update meets the requirements of sections 5.2a and 5.2b of NUREG-0737 Rev. 1. Without such compliance, the adequacy of control room design and procedures is in doubt and the public health and safety are thereby endangered.

July 2 pleading at 2.

Section 5.2.a., which directs licensees to "submit a program plan within two months of the start of the control room review," was not applicable to Applicants because the DCRDR was conducted prior to the promulgation of the regulation. At the suggestion of the NRC Staff, Applicants submitted a description of the program plan that was used in performing the DCRDR. See June 1 Supplement at § 2.0. Mr. Eddleman has not identified any specific problem with the program plan. There is no basis for a contention that Applicants have failed properly to design a program plan and to conduct the DCRDR.

Section 5.2.b. provides:

All licensees shall submit a summary report of the completed review outlining proposed control room changes, including their proposed schedules for implementation. The report will also provide a summary justification for human engineering discrepancies with safety significance to be left uncorrected or partially corrected.

The DCRDR Report with the June 1 Supplement meets the requirement for a "summary report." Proposed control room changes are discussed. See DCRDR Report at §§ 3.4, 4.4, 5.4, 6.4, 7.4;

June 1 Supplement at § 3.0. In general the changes have been implemented or will be implemented prior to completion of the control room or prior to development of operating procedures, as appropriate. See June 1 Supplement at § 3.0. No human engineering discrepancies with safety significance have been left uncorrected or partially corrected.^{7/} See June 1 Supplement at Table 3-1, Summary Report Section 3.4b. There is no basis for the allegation that Applicants have failed to meet regulatory requirements.

Mr. Eddleman is correct that consideration of human factors engineering in the control room design and construction and in the development of the operating procedures is an ongoing process. The same can be said for the construction of the plant, development of technical specifications, and the development of procedures. The fact that the process is ongoing is not the basis for litigating whether the process will be completed properly; if it were, there would be no bounds to what is litigable. Applicants have described, now in some detail, their program for incorporating human factors engineering into the control room design and in emergency operating

^{7/} There is no requirement to list each discrepancy and discuss its resolution and justification, as suggested by Mr. Eddleman. Section 5.2.b. requires a "summary report." Only discrepancies with safety significance need be addressed if they will not be corrected. Applicants have no such uncorrected discrepancies. As mentioned previously, the NRC will audit the DCRDR in August to ensure regulatory requirements have been met.

procedures. Applicants have set forth the results of the DCRDR and the resolution of recommendations made as a result of the DCRDR. Mr. Eddleman has not found fault with one aspect of this program. He simply wants to see more. Yet, in failing to advance a contention with basis and specificity he is not entitled to more. This contention must be rejected.

Contention 132F (Harris Units 1 and 2 Control Rooms do not
Comply with all Requirements of Supplement
1 to NUREG-0737

132F CP&L's Harris 1 and 2 control rooms do not comply with all requirements of NUREG-0737, Rev. 1. Without assured compliance with these requirements, CP&L's ability to protect the public from the danger of serious nuclear accidents or inadvertent radiation releases is in doubt.

July 2 pleading at 4.

This omnibus contention rehashes some of the arguments made by Mr. Eddleman previously. It is overly broad in scope. The examples cited as basis are simply incorrect or fail to support the contention.

First, Mr. Eddleman asserts Applicants have failed to provide for an SPDS. As discussed in response to Contention 132B, the SPDS is on order and will be installed as required.

Second, Mr. Eddleman states that Applicants have failed to compare display and control requirements with a control room inventory to identify missing displays and controls. It is true that such a final inventory has not yet been performed

since the control room is not yet built. Such a comparison was made, however, with the mock-up main control board. A final comparison will, as required, be performed after the control room has been constructed and equipped. See Applicants' response to Contention 132C II supra. This does not serve as the basis that the Harris control rooms "do not comply with" regulatory requirements.

Third, Mr. Eddleman asserts that Applicants have not complied with Section 5.1.d. of Supplement 1 to NUREG-0737. This is not true. Applicants have verified that each design improvement will provide the necessary correction, and can be introduced in the control room without creating any unacceptable human engineering discrepancies. As stated in the June 1 Supplement, the Essex Corporation field project manager provided the first review and "verification." June 1 Supplement at 2-1; see also Applicants' response to Contention 132 IIC supra. As noted earlier the SPDS has been incorporated into the control room design. (Furthermore, there is no requirement that this verification process be discussed in the summary report.) Again, this bald allegation provides no support for a contention that the Harris control room fails to comply with regulatory requirements.

Fourth, Mr. Eddleman asserts again that Applicants have failed to meet the requirements in Section 5.2.b of Supplement 1 to NUREG-0737 that the summary report "provide a summary

justification for human engineering discrepancies with safety significance to be left uncorrected or partially corrected." As discussed previously, in response to Contentions 132C II and 132E, Applicants corrected all discrepancies with any possible safety significance. There were no discrepancies left uncorrected or partially corrected with safety significance.

Finally, Mr. Eddleman alleges that Applicants have failed to meet Section 7.1 of Supplement 1 to NUREG-0737, which requires use of human factored, function oriented, emergency operating procedures ("EOP"). It is true that the Harris EOPs have not been completed. However, Applicants described their efforts to reformat EOPs to take into account human factors engineering. See DCRDR Report at § 7.0, Appendix G; June 1 Supplement at § 2.4, Table 3-1 (Summary Report Section No. 7.4). A set of H.B. Robinson Unit 2 EOPs were modified for use on the Harris simulator. These modified EOPs were reformatted to incorporate human factors concerns such as readability and comprehensibility. The reformatted EOPs were used at the simulator to video-tape operator activities during simulated emergencies. These video-tapes were given an in-depth, interactive review by senior human factors specialists. Developed flaws were analyzed for various human factor concerns such as operator task loading, operator information, action coordination, and operator interactions. Harris symptom-based EOPs are currently under development and will be test analyzed

prior to implementation based on the experience with the modified Robinson EOPs. June 1 Supplement at § 2.4. Thus, Mr. Eddleman provides no support for his omnibus contention in this regard.

Contention 132F must be rejected.

Contention 132G (Emergency Operating Procedures)

132G The design & construction of the Harris control room and emergency operating procedures using HER is incomplete and has not been evaluated or approved. It has not been shown to meet the requirements of NUREG-0737 Rev. 1 with respect to human factors. Without compliance with these requirements, the public health and safety is endangered in the event of an accident at Harris because human factors may worsen or cause an accident.

July 2 pleading at 3A.

There is nothing in this contention or its proffered basis that has not been alleged previously. Mr. Eddleman's only basis for this overly broad contention is the argument that since the process is ongoing and Applicants cannot be "trusted," we should litigate the issue until the process is completed. He offers as support of this thesis a litany of issues from alleged QA/QC failures to release of low-level waste to defective pipe hangers. These issues are generally related to other contentions. It is unclear how Contention 132G would be litigated, since the basis has no relationship to the subject matter of the contention. If we followed Mr.

Eddleman's logic, any substantive issue would be litigable if only Mr. Eddleman were to recite his list of reasons for lack of "trust" and the fact that the plant, procedures, analysis, etc. have not been completed. This is not adequate basis for a contention and, as demonstrated previously, Mr. Eddleman has failed to point to one specific deficiency in Applicants' DCRDR. Contention 132G must also be rejected.

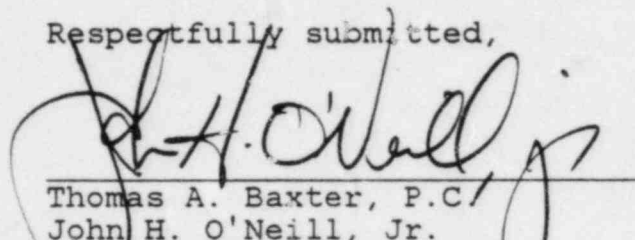
Contentions 142, 143 and 144

Contentions 142, 143 and 144 do not involve the DCRDR. Mr. Eddleman reasserts these contentions in his July 2 pleading. He addresses the five lateness factors for Contention 143, but not for Contentions 142 and 144. Applicants reaffirm their position regarding the inadmissibility of these contentions as set forth in Applicants' Response of January 25, 1983. Applicants will address Mr. Eddleman's arguments regarding the lateness of Contentions 142, 143 and 144 on or before September 9, 1983, pursuant to the schedule established by the Board.

CONCLUSION

For all of the reasons set forth above, Mr. Eddleman's
DCRDR Contentions must be rejected.

Respectfully submitted,



Thomas A. Baxter, P.C.
John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036
(202)822-1090

and

Richard E. Jones
H. Hill Carrow
Carolina Power & Light Company
P. O. Box 1551
Raleigh, North Carolina 27602
(919) 836-6839

Counsel for Applicants

Dated: July 29, 1983

July 29, 1983

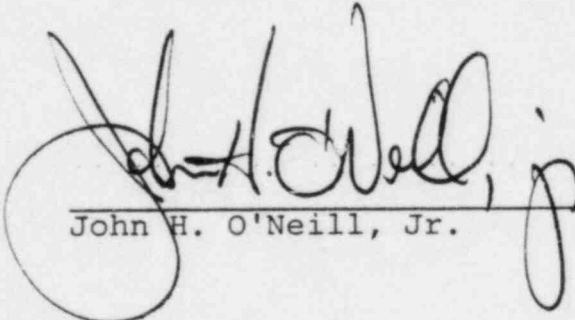
UNITED STATES OF AMERICA
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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Response to Proposed Contentions on the Detailed Control Room Design Review (DCRDR) Proffered by Intervenor Wells Eddleman" were served this 29th day of July, 1983 by deposit in the United States mail, first class, postage prepaid, to the parties on the attached Service List.



John H. O'Neill, Jr.

Dated: July 29, 1983

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MUNICIPAL POWER AGENCY

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)
)
)

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 (4)
Myron Karman, Esquire
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Mr. Daniel F. Read, President
Chapel Hill Anti-Nuclear Group Effort
Post Office 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
Post Office 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

Richard E. Jones, Esquire
Vice President and Senior Counsel
Carolina Power & Light Company
Post Office Box 1551
Raleigh, North Carolina 27602

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

Dr. Linda Little
Governor's Waste Management Board
513 Albemarle Building
325 North Salisbury Street
Raleigh, North Carolina 27611

Service List
Page Two

Bradley W. Jones, Esquire
U.S. Nuclear Regulatory Commission
Region II
101 Marrietta Street
Atlanta, Georgia 30303

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

Karen E. Long, Esquire
Public Staff - NCUC
Post Office Box 991
Raleigh, North Carolina 27602