

January 13, 1984

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF GENERAL COUNSEL  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20545

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	)	
	)	
(Snearon Harris Nuclear Power	)	
Plant, Units 1 and 2)	)	

APPLICANTS' SUPPLEMENTAL RESPONSES TO  
WELLS EDDLEMAN'S GENERAL INTERROGATORIES  
AND INTERROGATORIES ON CONTENTIONS 41 AND 65  
TO APPLICANTS CAROLINA POWER & LIGHT COMPANY, et al.  
(FIRST SET)

Fursuant to the Licensing Board's "Memorandum and Order (Ruling on Discovery Disputes)" of October 6, 1983, and to the rulings issued by the Board during telephone conferences on September 22 and 23, 1983, Applicants herein provide their responses to a portion of those interrogatories for which the Board granted intervenor Eddleman's Motion to Compel Discovery. Additional supplemental responses were filed by Applicants on November 11, 1983. Responses to the remaining discovery requests which Applicants have been ordered to answer (i.e.,

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Interrogatories 41-1(1) and 41-1(m)), have been deferred pending the Board's disposition of Applicants' Motion for Protective Order, dated January 13, 1984.

#### RESPONSES TO GENERAL INTERROGATORIES

INTERROGATORY NO. G1(c): Please state the name, present or last known address, and present or last known employer of each person whom Applicants believe or know (1) has first-hand knowledge of the facts alleged in each such answer; or (2) upon whom Applicants relied (other than their attorneys) in making such answer.

ANSWER: W. D. Goodman, who is employed as project manager by Daniel Construction Company at the Shearon Harris Nuclear Power Plant, provided information upon which Applicants relied in answering Interrogatories 41-1(r), 41-1(s) and 41-5(g).

A. Fuller, who is employed by Carolina Power & Light Company at the Harris plant, provided information upon which Applicants relied in answering Interrogatory 41-4(i).

#### RESPONSES TO INTERROGATORIES ON CONTENTION 41

INTERROGATORY NO. 41-1(r): Were any welders discharged due to making defective pipe hanger welds at Harris prior to 9/3/80? Identify each such welder.

INTERROGATORY NO. 41-1(s): Were any welders discharged due to making defective pipe hanger welds at Harris after 9/3/80? Identify each such welder.

INTERROGATORY NO. 41-5(g): Provide the name and last known address of any welders discharged for making defective welds after the welder retraining program. (Tr. 729).

ANSWER: Daniel has not discharged any welders for making defective pipe hanger welds.

INTERROGATORY NO. 41-4(i): List all persons under g above who are no longer at Harris, giving last known address for each.

ANSWER: Not applicable. See answer to Interrogatory 41-4(g), dated May 12, 1983.

Respectfully submitted,

*Thomas A. Baxter*

Thomas A. Baxter, P.C.  
SHAW, PITTMAN, POTTS & TROWBRIDGE  
1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1090

Richard E. Jones  
Samantha Francis Flynn  
CAROLINA POWER & LIGHT COMPANY  
P.O. Box 1551  
Raleigh, North Carolina 27602  
(919) 836-6517

Counsel for Applicants

Dated: January 13, 1984

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

AFFIDAVIT OF ROLAND M. PARSONS

County of Wake )  
 ) ss:  
State of North Carolina )

Roland M. Parsons, being duly sworn according to law, deposes and says that he is Project General Manager - Shearon Harris Nuclear Power Plant of Carolina Power & Light Company; that the answers to Interrogatories on Contention 41 contained in "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 41 and 65 to Applicants Carolina Power & Light Company, et. al., (First Set)" are true and correct to the best of his information, knowledge and belief, and that the sources of his information are officers, employees, agents and contractors of Carolina Power & Light Company.

*Roland M. Parsons*

Roland M. Parsons

Sworn and subscribed to before me  
this 11 day of January, 1984.

*Deborah R. Hudson*  
\_\_\_\_\_  
Notary Public

My Commission expires My Commission Expires 4-20-85

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	)	
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Plant, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 41 and 65 to Applicants Carolina Power & Light Company, et al. (First Set)" were served this 13th day of January, 1984, by deposit in the U.S. mail, first class, postage prepaid, to the parties on the attached Service List.

Thomas A. Baxter  
Thomas A. Baxter, P.C.

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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  
Janice E. Moore, Esquire  
Office of Executive Legal Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

Mr. Daniel F. Read, President  
CHANGE/ELP  
5707 Waycross Street  
Raleigh, North Carolina 27606

John D. Runkle, Esquire  
Conservation Council of North Carolina  
307 Granville Road  
Chapel Hill, North Carolina 27514

M. Travis Payne, Esquire  
Edelstein and Payne  
P.O. Box 12607  
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  
P.O. Box 1551  
Raleigh, North Carolina 27602

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

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

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

Mr. Robert P. Gruber  
Executive Director  
Public Staff - NCUC  
P.O. Box 991  
Raleigh, North Carolina 27602