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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & RECORDS
BRANCH

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' RESPONSES TO
WELLS EDDLEMAN'S GENERAL
INTERROGATORIES AND INTERROGATORIES
ON CONTENTION 8F(2) TO APPLICANTS
CAROLINA POWER & LIGHT COMPANY, et al.
(SIXTH SET)

Applicants Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency, pursuant to 10 C.F.R. § 2.740b, hereby submit the following responses to "Wells Eddleman's General Interrogatories and Interrogatories on Contention 8F(2) to Applicants Carolina Power & Light Company, et al. (Sixth Set)." The provision of answers to these interrogatories is not to be deemed a representation that Applicants consider the information sought to be relevant to the issues to be heard in this proceeding.

RESPONSES TO GENERAL INTERROGATORIES

INTERROGATORY NO. G-1(a). Which contentions of Wells Eddleman do Applicants agree are now admitted in this proceeding, NRC Dockets 50-400/401 O.L.?

ANSWER: The contentions of Intervenor Eddleman which are admitted to this proceeding are set forth in various memoranda and orders issued by the Atomic Safety and Licensing Board, all of which are available to Mr. Eddleman.

INTERROGATORY NO. G-1(b). For each such contention, provide for any answers to interrogatories by Wells Eddleman which Applicants have previously or presently received (except those suspended by Board order, if any), the following information.

ANSWER: The answers to General Interrogatories herein are restricted to Eddleman Contention 8F(2).

INTERROGATORY NO. G-1(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: The following person provided information upon which Applicants relied in answering the interrogatories on Eddleman Contention 8F(2).

<u>PERSON</u>	<u>INTERROGATORY NO(S).</u>
Dr. John J. Mauro	8F(2)-6, 8F(2)-7(a-d)
Samantha Francis Flynn, Esq.	8F(2)-7(e-f)

Dr. Mauro is employed by Envirosphere Company, a division of Ebasco Services, Inc., a contractor to Applicants. Ms. Flynn is Associate General Counsel of Carolina Power & Light Company.

INTERROGATORY NO. G-1(d). Please identify all facts concerning which each such person identified in response to G-1(c)(1) above has first-hand knowledge.

ANSWER: See answer to Interrogatory No. G-1(c).

INTERROGATORY NO. G-1(e). Please identify all facts and/or documents upon which each person identified in response to G-1(c)(2) above relied in providing information to respond to the interrogatory, including the parts of such documents relied upon.

ANSWER: All facts or documents relied upon by those individuals identified in the answer to Interrogatory No. G-1(c) are indicated within each response to the specific interrogatories on Contention 8F(2).

INTERROGATORY NO. G-1(f). Please identify any other document(s) used or relied upon by Applicants in responding to the interrogatory.

ANSWER: See answer to Interrogatory No. G-1(e).

INTERROGATORY NO. G-1(g). Please state which specific fact each document, identified in response to G-1(e) and G-1(f) above, supports, in the opinion or belief of Applicants, or which Applicants allege such document supports.

ANSWER: In this instance, Applicants have not relied on any document in responding to interrogatories on Contention 8F(2) herein.

INTERROGATORY NO. G-1(h). Please state specifically what information each person identified in response to G-1(c)(1) or G-1(c)(2) above provided to or for Applicants' affiant in answering the interrogatory. If any of this information is not documented, please identify it as "undocumented" in responding to this section of General Interrogatory G-1.

ANSWER: See answer to Interrogatory No. G-1(c).

INTERROGATORY NO. G-2(a). Please state the name, present or last known address, title (if any), and present or last known employer, and economic interest (shareholder, bondholder, contractor, employee, etc.) if any (beyond expert or other witness fees) such person holds in Applicants or any of them, for each person you intend or expect to call as an expert witness or a witness in this proceeding, if such information has not previously been supplied, or has changed since such information was last supplied, to Wells Eddleman. This applies to Eddleman and Joint Contentions as admitted, or stipulated by Applicants.

ANSWER: Applicants have not yet identified the expert or other witnesses they expect to call in this proceeding. When and if such witnesses are identified, Applicants will supplement this response in a timely manner.

INTERROGATORY NO. G-2(b). Please identify each contention regarding which each such person is expected to testify.

ANSWER: See answer to Interrogatory No. G-2(a).

INTERROGATORY NO. G-2(c). Please state when you first contacted each such person with regard to the possibility of such person's testifying for Applicants, if you have contacted such person.

ANSWER: See answer to Interrogatory No. G-2(a).

INTERROGATORY NO. G-2(d). Please state the subject matter, separately for each contention as to which each such person is expected to testify, which each such person is expected to testify to.

ANSWER: See answer to Interrogatory No. G-2(a).

INTERROGATORY NO. G-2(e). Please identify all documents or parts thereof upon which each such witness is expected to, plans to, or will rely, in testifying or in preparing testimony.

ANSWER: See answer to Interrogatory No. G-2(a).

INTERROGATORY NO. G-3(a). Please identify any other source(s) of information which Applicants have used to respond to any interrogatory identified under G-1 above, stating for each such source the interrogatory to which it relates, and what information it provides, and identifying where in such source that information is to be found.

ANSWER: Applicants have identified all such other sources of information, if any, within the answers to the specific interrogatories set forth herein.

INTERROGATORY NO. G-3(b). Please identify any other source(s) of information not previously identified upon which any witness identified under G-2 above, or other witness, has used in preparing testimony or exhibits, or expects to use in testimony or exhibits, identifying for each such source the witness who is expected to use it, and the part or part(s) of such source (if applicable) which are expected to be used, and, if not previously stated, the fact(s) or subject matter (or both) to which such source relates.

ANSWER: See answer to Interrogatory No. G-2(a).

INTERROGATORY NO. G-4(a). Please identify all documents, and which pages or sections thereof Applicants intend or expect to use in cross-examination of any witness I call in this hearing. For each such witness, please provide on a timely basis (ASAP near or during hearings) a list of all such documents, the subject matter Applicants believe they relate to, and make the document(s) available for inspection and copying as soon as possible after Applicants decide or form intent to use such document in cross-examination.

ANSWER: Applicants have not yet identified which documents, if any, they intend to use in cross-examination of Mr. Eddleman's witnesses.

INTERROGATORY NO. G-4(b). Please identify any undocumented information Applicants intend to use in cross-examination of each such witness for me.

ANSWER: See answer to Interrogatory No. G-4(a).

INTERROGATORY NO. G-5(a). For each contention Applicants state or admit is an admitted Eddleman contention under G-1(a) above, or an admitted joint intervenor contention, please state whether Applicants have available to them experts and information, on the subject matter of the contention.

ANSWER: Applicants have available to them experts and information on the subject matter of Contention 8F(2).

INTERROGATORY NO. G-5(b). If the answer to (a) above is other than affirmative, state whether Applicants expect to be able to obtain expertise in the subject matter, and information on it, and if not, why not.

ANSWER: Not applicable.

INTERROGATORY NO. G-6(a). For each document identified in response to any interrogatory herein, or referenced in response to any interrogatory herein, please supply all the following information which has not already been supplied:

- (i) date of the document
- (ii) title or identification of document
- (iii) all authors of the document, or the author
- (iv) all qualifications (professional, technical) of each author of the document
- (v) the specific parts, sections or pages, of the document, if any, upon which Applicants rely
- (vi) the specific information each part, section or page identified in response to (v) above contains
- (vii) identify all documents used in preparing the document, to the extent known (and also to the extent not identified in the document itself)
- (viii) state whether Applicants possess a copy of the document
- (ix) state all expert opinions contained in the document, upon which Applicants rely, or identify each such opinion.
- (x) identify the contention(s) with respect to which Applicants rely upon (a) the expert opinions (b) the facts identified in the document

(xi) state whether Applicants now employ any author(s) of the document, identifying each such person for each document

(xii) state whether Applicants have ever employed any author(s) of the document, identifying each such person for each document

(xiii) identify all sources of data used in the document. Answers to all the above may be tabulated or grouped for efficiency.

ANSWER: There are no documents upon which Applicants rely in responding to the interrogatories herein. As such, Applicants are not separately responding to Mr. Eddleman's request for production of documents.

INTERROGATORY NO. G-7(a). Please identify all documents which Applicants plan, expect or intend to offer as exhibits (other than for cross-examination) with respect to each Eddleman contention admitted in this proceeding which (i) is included in your current response to G-1(a), or (ii) is the subject of interrogatories in this set; please state for which contention or contentions each exhibit will be or is expected to be offered.

ANSWER: Applicants have not yet identified those documents they intend to offer as exhibits relating to Eddleman Contention 8F(2).

INTERROGATORY NO. G-7(b). Please identify all documents which Applicants plan, expect or intend to use in cross-examination of any other parties' witnesses or joint intervenor witness in this proceeding, with respect to (i) Eddleman contentions identified under G-7(a)(i) (or G-1(a)) above, or any other Eddleman contention which is the subject of interrogatories in this set; (ii) each Joint contention now admitted in this proceeding; (iii) per our agreement of 4-8-83, each contention of each other party to this proceeding which is currently admitted. Please identify for each such document the witnesses, or witness, and all contentions with respect to whom (or which) that document is planned, expected, or intended to be offered or used.

ANSWER: Applicants have not yet identified those documents they intend to use for cross examination of any witnesses.

INTERROGATORY NO. G-7(c). Please identify which of the documents identified in response to (b) above (i) will be offered into evidence by Applicants, and (ii) which of the same documents Applicants expect to offer into evidence or intend to offer as evidence or exhibits in this proceeding.

ANSWER: See answer to Interrogatory No. G-7(b).

INTERROGATORY NO. G-10(a). Where the above general interrogatories, and/or specific interrogatories below, or any of them, call for identification of documents, (i) and no documents are identified, is that the same as Applicants stating that there are no documents responsive to this general interrogatory, in each case where no documents are identified? (ii) and documents are identified, is that the same as Applicants stating that the identified documents are the only ones presently known which are responsive to the interrogatories? (iii) If your answer to G-10(a)(ii) is other than affirmative, please state all reasons for your answer. (iv) If your answer to G-10(a)(i) above is other than affirmative, please state all reasons for your answer. (b) Where any interrogatory, general or specific, herein, calls for factual information (i) and an opinion is stated in response, is that the expert opinion of any person(s) identified as having contributed information to that response? (ii) and facts are given or identified (or a fact is) in response, but no documents are identified, does that mean Applicants have no documents containing such fact(s)? (iii) If your answer to (i) above is affirmative, please state for each such response all qualifications of each expert upon whom Applicants rely for each such answer. The qualifications need be stated only once for each such person if they are clearly referenced in other answers. (iv) if your answer to (i) above is other than affirmative, please state which opinions, if any, given in response to interrogatories (general or specific) herein is the opinion of an expert, identify each expert whose opinion you used in response to each interrogatory, and state in full the qualifications of each such expert. (v) If your answer to (i) above is other than affirmative, please identify all opinions of non-experts used in your responses, and identify each non-expert whose opinion is included in each answer herein. (vi) If your response to (ii) above is other than affirmative, please identify each document which contains a fact not previously documented in your response(s), stating what the fact is, and at what page, place, chapter or other specific part of the document contains such fact.

ANSWER:

- (a)(i) Yes.
- (ii) Yes.
- (iii) Not applicable.
- (iv) Not applicable.
- ((b)(i) Yes.
- (ii) See Answers to G-1(e), (b) and (g).
- (iii) See Attachment A. Ms. Flynn's notice of appearance is on record in this proceeding.
- (iv) Not applicable.
- (v) Not applicable.
- (vi) Not applicable.

INTERROGATORY NO. G-11. For each answer to each interrogatory herein (or any subpart or part thereof), please identify each item of information in possession of Applicants (including facts, opinions of experts, and documents) which (a) contradicts the answer you made, (i) in whole (ii) in part (please identify each such part for each item of information identified); (b) casts doubt on your answer (i) in whole (ii) in part (please identify each such part for each item of information identified). (c) Please identify all documents not already identified in response to parts (a) and (b) above (and their subparts) which contain any item of information asked for in (a) or (b) above. Please identify for each such document what information item(s) it contains and what answer(s) each such item is related to.

ANSWER: Applicants have no such information.

ANSWERS TO INTERROGATORIES ON EDDLEMAN 8F(2)

INTERROGATORY NO. 8F(2)-6(a). Do Applicants agree with NRC Staff that NUREG-0668 is a draft, not a final, position? (b) If answer to (a) is other than affirmative, please state all reasons for your position or disagreement. (c) Have Applicants or anyone working for them made any study of what the dose estimates would be if NRC Translation 520 were changed to reflect all the different estimates given in NUREG-0668 in criticism of Translation 520? (d) Do Applicants know if anyone else has calculated or studied what the dose estimates given in NRC Translation 520 would become if (i) any (ii) each (iii) all different estimate(s) in NUREG-0668 were used in place of the ones actually used in Translation 520? (e) If answer to any part of (d) is affirmative, identify each such person or group and all documents containing each such study. (f) Please state or identify any documents known to you which state estimates inquired about in (c) or (d) above, other than NUREG-0668 and NRC Translation 520. (g) Please state whether Applicants rely on NUREG-0668 in this proceeding, or any parts of it, stating which pages or parts (if any). (h) Please state whether Applicants rely on the letter from E.K.F. Bautz identified in response to my interrogatory 8F2-4(d), or any parts of it, in this proceeding, identifying any particular parts relied upon. (j) Please state whether Applicants rely on the GRS "Comment" of March 1979, identified in response to my interrogatory 8F2-4(d), identifying any parts of it you rely on in this proceeding. (k) Please state whether (i) NUREG-0668 (ii) the letter of E.K.F. Bautz (iii) the GRS "Comment" cited above, has ever been (aa) published in a peer-reviewed scientific journal (bb) published in a peer-reviewed engineering journal (cc) published in the proceedings of any scientific society or group (dd) submitted for publication by any peer reviewed journal of science or engineering or any field of science or engineering. (l) For all parts or subparts of (k) above for which your answer is affirmative, please identify (i) the document publication date, if any (ii) the date of submittal, if known (iii) the journal or publication which published it, if any (iv) the date, volume, issue and page numbers where it was published, if known (v) the address of the editors of such publication, if known.

ANSWER:

8F(2)-6(a): Yes.

(b): Not applicable.

(c): No, not for the Wyhl Nuclear Power Plant.

(d): Not specifically, although each time the NRC Staff or any applicant for a nuclear operating license properly assesses the dose from radiological releases, the values of parameters as discussed in NUREG-0668, rather than the inappropriate values used in NRC Translation 520, are utilized.

(e): See Answer to (d) above.

(f): Applicants are not aware of any such documents.

(g): Yes, in the context of demonstrating the universal scientific criticism of NRC Translation 520. The entire document establishes the fact of such criticism.

(h): See Answer to (g) above.

(j): See Answer to (g) above.

(k): Not to Applicants' knowledge.

(l): Not applicable.

INTERROGATORY NO. 8F(2)-7(a). Do Applicants know if health effects of uranium fuel cycle emissions (as set forth in Table S-3) have been litigated in any other nuclear plant operating license proceeding? (b) Please identify each license proceeding in which these health effects were litigated. (c) Do Applicants know if the models, data, assumptions, or conclusions (or any of them) of NRC translation 520 have been litigated in any other NRC licensing proceeding? (d) Please identify each such proceeding known to you and state (if known) what matters relating to NRC translation 520, and what contention(s) relating to NRC translation 520 were litigated or are being litigated in each such proceeding. (e) Have Applicants participated in any NRC proceeding (i) related to determining the health effects of radioactive effluents given in Table S-3 (ii) related to the determination of the values for effluent emissions given in Table S-3? (f) for any part of (e) for which your answer is affirmative, please identify each such proceeding and state what position, if any, Applicants took in it, whether a decision has been reached in the

proceeding, and if so, what that decision was as it related to Table S-3 emissions and their health effects. (g) Are there other ongoing NRC proceeding known to Applicants in which the health effects of radioactive emissions as set forth in Table S-3 are at issue? (h) Please identify each such proceeding and state (if known) the contention(s) relating to health effects of radioactive emissions set forth in Table S-3 that are at issue therein, whose contention each is, and whether you possess any documents relating to that contention in that proceeding. Please list, for each such contention, the documents relating to it which Applicants possess.

ANSWER:

8F(2)-7(a): Yes.

(b): Applicants are aware of the litigation of certain aspects of the health effects of the uranium fuel cycle in Pennsylvania Power and Light Co., et al. (Susquehanna Steam Electric Station, Units 1 and 2), Docket Nos. 50-387-OL, 50-388-OL.

(c): Yes.

(d): See Metropolitan Edison Co. (Three Mile Island Nuclear Station, Unit No. 1), Docket No. 50-289-SP.

The matters litigated in the above cited proceeding can be determined from public records regarding that proceeding.

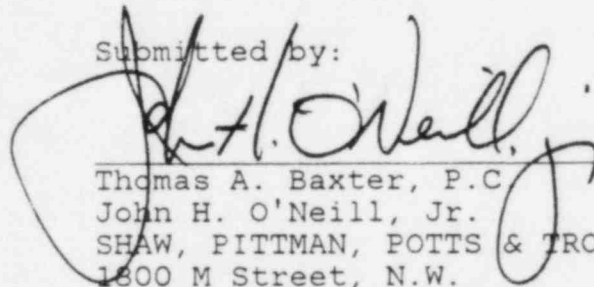
(e): (i) No. (ii) Yes.

(f): Applicant Carolina Power & Light Company participated, as a member of a group of utilities, in the Table S-3 rulemaking and litigation. The validity of the Table S-3 rule was finally resolved in Baltimore Gas & Electric Co. v. National Resources Defense Counsel, Inc., 103 S. Ct. 2246, 462 U.S. _____

(1983). The position of the parties in the litigation is summarized in the above cited Supreme Court decision and in earlier court decisions cited therein.

NOTE: This response does not include information regarding radon, the health effects of which are being treated generically and are outside the scope of Contention 8F(2).

Submitted by:



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Counsel for Applicants

Dated: November 2, 1983

4/83

Page 1 of 4

JOHN JOSEPH MAURO
Certified Health Physicist

SUMMARY OF EXPERIENCE (Since 1970)

Total Experience - 12 years total experience. Six years experience in calculating projected exposures of radionuclides in the environment and evaluating the biological significance of these exposures. Six years experience in managing radiological and hazardous chemical consulting projects.

Professional Affiliations - Health Physics Society
ANSI Committee N18 - Guide to Standard Format
and Content of Emergency Plans for Nuclear
Power Generating Facilities

Education - PhD, New York University, 1973 - Biology, Radiological Health
MS, New York University, 1970 - Biology, Radiological Health
BS, Long Island University, 1967 - Biology, Bacteriology

Awards - Alvin Gruder Memorial Award
Founders Day Award

REPRESENTATIVE ENVIROSPHERE PROJECT EXPERIENCE (Since 1973)

1973 to Present

Radiological Assessment Scientist/Director Radiological Assessment and
Health Physics Department

Responsible for evaluating the radiological impact of nuclear power plant operation for Ebasco's client utilities. Prepared the requisite sections of the Environmental Reports and Safety Analysis Reports and defended these analyses before the NRC, the Advisory Committee on Reactor Safeguards, State Site Certification Boards and the Atomic Safety and Licensing Boards. Provided these services for 10 nuclear power plants.

Responsible for the calculation of projected radionuclide inventories and liquid and gaseous source terms associated with various aspects of normal plant operation and hypothetical accidents. Experienced in the calculation of the projected environmental transport, distribution and concentration of radionuclides released in the liquid and gaseous effluent of nuclear power facilities; the calculation of the projected exposures to man and organisms other than man due to radionuclides in the environment; and the evaluation biological effects of exposure to radiation.

JOHN JOSEPH MAURO (Continued)

Experienced in the design of environmental radiological surveillance programs for nuclear power facilities. Has installed and calibrated radiation detection instrumentation at low level radiological laboratories and participated in the training of laboratory personnel.

Has managed the preparation of several emergency response plans and implementation procedures for commercial nuclear power facilities and for state agencies responsible for emergency response planning.

Has provided radiological and emergency response training to health physicists, nuclear engineers and members of state and local agencies responsible for emergency planning.

Has managed the preparation of the environmental/radiological technical specifications and offsite dose calculation manuals for several nuclear power facilities.

Has managed numerous consulting projects in the area of decommissioning, environmental monitoring, environmental dosimetry in-plant health physics for the nuclear fuel cycle.

Has performed several toxic chemical studies in support of nuclear power plant control room design and in the assessment of the radiological and chemical toxicity of low level radioactive wastes.

PRIOR EXPERIENCE (2 years)

Private part-time consulting work.

Worked on the radiological effects sections of a nuclear power plant environmental impact report. Drafted answers to interrogatories from an AEC licensing hearing.

New York University Institute of Environmental Medicine
Assistant Research Scientist (2 years)

Performed research work on the life history of white perch in the Hudson River. Aided in the cataloging and enumeration of invertebrates in the Hudson River. Participated in a project to develop techniques to determine and ability of various micro-organisms to organify inorganic mercury.

Publications and Presentations

Mauro, J J and M E Wrenn 1972. A review of radiocesium in aquatic biota. Presented at the Health Physics Society Annual Meeting, Las Vegas, Nevada, June 12-16.

JOHN JOSEPH MAURO (Continued)

Mauro, J J and M E Wrenn 1973. Reasons for the absence of a trophic level effect for radiocesium in the Hudson River Estuary. Presented at the IRPA meeting held in Washington, D.C. in October. Published in the proceedings of that meeting.

Mauro, J J, and J Porrovecchio. Numerical criteria for in-plant as low as is reasonably achievable proceedings of the 9th Mid-Year Topical Symposium of the Health Physics Society.

Mauro, J J, D Michlewicz and A Letizia 1977. Evaluation of environmental dosimetry models for applicability to possible radioactive waste repository discharges, Y/OW1/SUB-77/45705, September.

Mauro, J J 1978. Comparison of gaseous effluent standards for nuclear and fossil fuel power production facilities. Proceedings of the December 1978 Annual Meeting of the American Nuclear Society.

Mauro, J J, J Thomas, J Ryniker and R Fellman 1979. Airborne uranium, its concentration and toxicity in uranium enrichment facilities, K/PO/SUB-79/31057/1, February.

Mauro, J J, K E Lind, J D Levine, L Yemin, H J Howe, Jr and C W Pierce 1979. Safety related research required to support future fusion research reactors. Presented at the Annual Meeting of the American Nuclear Society-San Francisco, November.

Mauro, J J and E P O'Donnell 1979. A cost-benefit comparison of nuclear and nonnuclear health and safety protective measures and regulations. Nuclear Safety, Vol. 20 No. 5, September-October.

Mauro, J J 1980. A real time computer program for offsite radiological impact assessment. Presented at the 1980 Annual Meeting of the American Nuclear Society. TANSAC 34 1-899.

Mauro, J J, R Bhatia and G Martin 1980. Effects of containment purge on the consequences of a loss of coolant accident. Presented at the 1980 Annual Meeting of the American Nuclear Society. TANSAC 34 1-899.

Mauro, J J and S Marschke 1980. Radiocesium transport into reservoir bottom sediments - a licensing approach. Presented at the 1980 Annual Meeting of the ANS. TANSAC 34 1-899.

Mauro, J J and D Michlewicz 1981 deployment concepts for Real Time Environmental Dosimetry Systems. Presented at the 1981 Annual Meeting of the Health Physics Society.

Mauro, J J and E P O'Donnell 1982. The role of the Architect/Engineer in the Emergency Planning Process. Presented at the Annual Meeting of the American Nuclear Society. June 6-10, 1982.

JOHN JOSEPH MAURO (Continued)

Mauro, J J and W R Rish 1982. Dealing with Uncertainties in Examining Safety Goals for Nuclear Power Plants. In NUREG/CP-0027. Proceedings of the International Meeting on Thermal Reactor Safety.

Mauro, J J, S Schaffer, J Ryniker, and J Roetzer. Survey of Chemical and Radiological Indices Evaluating Toxicity. National Low-Level Radioactive Waste Management Program. DOE/LLW-17T. March, 1983.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

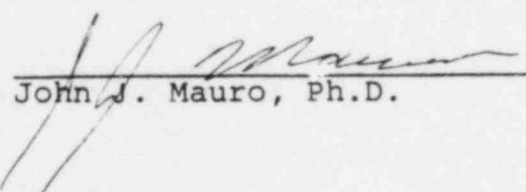
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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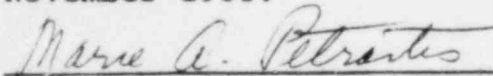
AFFIDAVIT OF JOHN J. MAURO

City of New York)
) ss
State of New York)

John J. Mauro, being duly sworn according to law, deposes and says that he is a consultant to Carolina Power & Light Company in the area of radiological assessment and health physics, and that the answers to Interrogatories 8F(2)-6 and 8F(2)-7, contained in "Applicants' Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contention 8F(2) to Applicants' Carolina Power & Light Company, et al. (Sixth Set)" are true and correct to the best of his information, knowledge and belief.


John J. Mauro, Ph.D.

Sworn to and subscribed to
before me this 2 day of
November 1983.


Notary Public

My commission expires _____

MARIE A. PETRAITIS
Notary Public, State of New York
No. 01PE4605003
Qualified in Kings County
Cert. Filed in New York County
Commission Expires March 30, 1985