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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
December 5, 1983

'83 DEC -8 AIO:23

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.
(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

Dockets 50-400 OL
50-401 OL

ASLBP No. 82-168-01
OL

Amendments to Discovery Responses re 8F(2) and 37B (by Wells Eddleman), and re Joint Contention II (by the Joint Intervenors), re witnesses on said contentions

In response to Applicants' General Interrogatories both Wells Eddleman and the Joint Intervenors hereby supplement their responses as follows (including information incorporated by reference):

3(a). Dr. Ernest Sternglass, position on p.1 of contemporaneously filed Answers to Board Questions re 37B and Joint II; present address 2925 Ramble Rd. East, Bloomington IN 47401; employer Univ. of Pittsburgh; qualifications as set out on p.4 of Responses to Board Questions filed by us Dec. 5 1983 and in the book referred to there; he is an expert witness, re 8F2, 37B (for Wells Eddleman) and Joint II (for Joint Intervenors Kudzu Alliance, Conservation Council of NC, CHANGE/ELP, and Eddleman).

3(b) Summary of anticipated testimony, see pml-3 of Dec. 5 Responses to Board Questions.

3(c) (i) radiation physics, radiation health effects, estimating health effects due to radioactive releases from nuclear plants etc.

(ii) Dr. Sternglass has been retained (specially employed) to testify on these contentions by JOINT INTERVENORS and Dr. Wells Eddleman

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3(a) Dr. Carl Johnson, a medical doctor who has been recognized as an expert in radiation health effects and testified as such before the NRC (re Clinch River Breeder Reactor) and in other cases; present address 42 Hillside Driver, Denver, CO 80215; present ^{position} employer and qualifications data not in hand yet.

3(b) Summary of anticipated testimony as now planned, see pp 4-7 of Joint Intervenor's/Eddleman Responses to Board Questions, 5 Dec. '83,

(1)
3(c) Health effects of radiation, including radioactive materials emitted from nuclear facilities; radioactive material in the environment.
(11) Dr. Johnson has been employed and specially retained by Joint Intervenor's and Wells Eddleman to testify on Joint Contention II, and on Eddleman 37B and 8f(2).

NOTE: Applicants and Staff are advised that the outlines of testimony of Drs. Sternglass, Johnson referenced above effectively updated and revise our past (WF and J.I.) responses as to what we are concerned with, & facts re the specific contention(s) referenced in each such outline. Where additional or different concerns and beliefs are stated, each was based on the statement(s) of the witness during preparation of the outline; thus, the identified witness helped prepare our response, in preparing the testimony outline given in our Dec 5 response to the Board. Joint Intervenor's and Wells Eddleman adopt the outline of testimony for Joint Intervenor's' Contention II, by each witness, as an updated statement of what we believe and are concerned with in that contention, to the extent it may differ from our previous responses. Wells Eddleman adopts, re 37B and 8F(2) respectively, each outline of testimony given in the Response to Board Questions, of December 5, 1983 likewise as an update of his discovery responses on each of those contentions to which each such outline refers.

Please GSD consider items after FOW P. 7 of Board Response as amended discovery re exports
Joint Intervenor's
Wells Eddleman
I affirm the above.