

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)	OFFICE OF SECRETARY
)	REGULATORY & SERVICE
DUKE POWER COMPANY, <u>et al.</u>)	BRANCH
)	Dockets Nos. 50-413
(Catawba Nuclear Station)	50-414
Units 1 and 2))	April 16, 1984

APPLICATION BY PALMETTO ALLIANCE
AND CAROLINA ENVIRONMENTAL STUDY GROUP
FOR ISSUANCE OF SUBPOENAS

Pursuant to 10 CFR 2.720 Palmetto Alliance and Carolina Environmental Study Group hereby apply for the issuance of subpoenas requiring the attendance and testimony of witnesses and the production of evidence at the adjudicatory hearings now scheduled to commence on May 1, 1984, at Rock Hill, South Carolina, on the subject of emergency planning for the Catawba Nuclear Station and with regard to the contentions of Palmetto and CESG which have been admitted for litigation.

Palmetto and CESG seek the issuance of subpoenas for the attendance, testimony and production of evidence by the persons identified on the attached schedule who are believed to have knowledge of evidence relevant to the claims or defenses of Intervenor, Applicants, or the NRC Staff because of their capacity and experience regarding the subject matter. Most of these persons are either state and local officials responsible

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in their official capacity for emergency planning, preparedness or protective action with respect to the Catawba facility, employees or agents of Applicants with similar responsibilities, or are other persons with knowledge or in control of evidence, relevant to the subject matter as indicated. The general relevance of the evidence sought is reflected by the position or capacity of the persons as identified. Palmetto and CESG will make such further showings of general relevance as may be required by the Board.

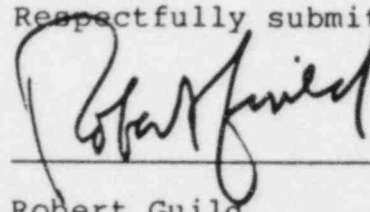
For each person indicated the subpoena should command attendance and testimony as well as the production of the following documentary evidence:

Any and all documents of whatever description in your custody or subject to your control reflecting your knowledge of emergency preparedness for the Catawba Nuclear Station, particularly including, but not limited to documents identified by you or your organization, agency or employer in connection with pre-hearing discovery requests in the NRC licensing proceeding for the Catawba facility.

Palmetto and CESG ask that the subpoenas be issued with the date and time of compliance in blank subject to specification by Intervenor prior to service based upon the hearing schedule as it becomes known; or, alternately, with the hearing commencement time and date set out so that Intervenor may specify a particularized time for appearance by letter or other

communication. We ask that such subpoenas be issued on behalf of the Commission and served by registered mail pursuant to 10CFR2.720(c), if possible; but agree to provide for service and tendering of fees for attendance in advance if necessary.

Respectfully submitted,



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Attorney for Palmetto Alliance

Jesse L. Riley
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Charlotte, NC
(704) 375-4342
Carolina Environmental Study
Group

SCHEDULE

PERSONS TO BE SUBPOENAED BY PALMETTO ALLIANCE AND CAROLINA ENVIRONMENTAL STUDY GROUP APRIL 16, 1984

1. Richard W. Riley	Governor of South Carolina
2. James B. Hunt, Jr.	Governor of North Carolina
3. Frank A. Sanders	Director of Public Safety Programs - Office of the Governor of South Carolina
4. Jesse T. Pugh, III	Director North Carolina Division of Emergency Management
5. Harvey Gantt	Mayor, City of Charlotte, NC
6. P. LaFontaine Odom	Chairman, Mecklenburg County Board of Commissioners
7. Gerald Fox	County Manager, Mecklenburg County
8. Gene Klugh	County Manager, York County
9. Mr. Varner	City Manager, York, SC
10. Steve Thomas	Director of General Services, York County
11. Chairman	County Governing Body, York County, S
12. Director	York County Emergency Preparedness Agency
13. Albert Pope	Sheriff, York County
14. Sam Foster	Rock Hill School District 3
15. Thomas B. Pettit, Jr.	Superintendent, York School District #1
16. Dr. Joe Gentry	Superintendent, Rock Hill School District #3
17. M. D. Davison	Superintendent, Clover School Distric #2
18. Joseph C. Bond	Superintendent, Fort Mill School District #4
19. Paul Lunsford	South Carolina Emergency Preparedness Division
20. Bill McSwain	Area Coordinator, South Carolina Emergency Preparedness Division
21. Howard P. Jernigan	South Carolina Emergency Preparedness Division
22. Joseph S. Connally	South Carolina Emergency Preparedness Division
23. Judy Turnipseed	Public Information Officer, South Carolina Governor's Office of Public Safety

24. Heyward Shealey	Director, Bureau of Radiological Health, South Carolina Department of Health and Environmental Control
25. Sam L. Finklea	Program Management Specialist, South Carolina Department of Health and Environmental Control
26. James Gregory, Jr.	Emergency Welfare Services Planner, South Carolina Department of Social Services
27. Betty L. Wright	York County Emergency Preparedness Agency
28. Joe W. Mitchell	York County Sheriff's Department
29. Ben F. Thomas, III	South Carolina State Law Enforcement Division
30. Billy M. Poore	South Carolina Highway Patrol
31. M. D. Thompson	South Carolina Highway Patrol
32. J. Vargos	South Carolina Highway Patrol
33. E. Lee Bacot	Emergency Preparedness Coordinator, South Carolina Department of Health and Environmental Control
34. Thomas R. Beckham	Branch Manager, Plan Division, South Carolina Emergency Preparedness Division
35. James Self	North Carolina Division of Emergency Management
36. Edwin H. Harris, Jr.	North Carolina Division of Emergency Management
37. Joseph F. Myers	North Carolina Division of Emergency Management
38. Gilbert R. Morris	North Carolina Division of Social Services
39. Wayne Broome	Administrative Officer, Charlotte-Mecklenburg Emergency Management Office
40. Luther Fincher	Director, Charlotte-Mecklenburg Emergency Management Office
41. R. E. Phillips	Director of Emergency Services, Gaston County
42. Nat Davis, Jr.	York School District #1
43. Corbett Gibson	York School District #1
44. Gene Ervin	Chief, York County Sheriff's Department
45. Gerald Meisner	Chairman, Civil Defense Citizens Committee, Greensboro, NC
46. Marilyn Brown	Director of Emergency Planning, Greensboro, NC
47. Kathy Gordon	Charlotte-Mecklenburg Emergency Management Planning Review Committee
48. Robert Snyder	Charlotte-Mecklenburg Emergency Management Planning Review Committee
49. P. F. Carter	Director, Community Relations, Duke Power Company
50. R. M. Glover	Emergency Response Coordinator, Duke Power Company

51. H. D. Brewer	Engineer Associate, Duke Power Co.
52. M. L. Birch	System Engineer, Duke Power Co.
53. J. H. Lee, Jr.	Technical Specialist, Duke Power Co.
54. D. R. House	Manager of Property and Liability Insurance, Duke Power Co.
55. K. S. Kanady	Manager, Nuclear Engineering Services Group, Duke Power Co.
56. W. P. Deal	Station Health Physicist, Duke Power Co.
57. M. A. Casper	Meteorologist Associate, Duke Power Co.
58. Mary Cartwright	Corporate Communications, Duke Power Co.
59. Mike Bolch	Emergency Preparedness Coordinator, Duke Power Co.
60. Jerry Lutes	PRC Voorhees
61. Walter Kulash	PRC Voorhees
62. Andrew Canen	PRC Voorhees
63. F. G. Hudson	Supervising Design Engineer, Duke Power Co.
64. Dayne Brown	Chief, Radiological Protection Service, North Carolina Department of Human Resources
65. Dennis Johnson	Disaster Specialist, American Red Cross
66. Stewart R. Taber	American Red Cross
67. J. W. Quattlebaum	Southern Bell Telephone & Telegraph Co.
68. Ron Dyson	Rock Hill Telephone Company
69. Harry M. Miller, Jr.	Ft. Mill Telephone Company
70. Marvin Chernoff	Chernoff-Silver Associates/Metro Mark Surveys
71. Randy Austin	Southern Bell Telephone & Telegraph Co.
72. Eugene McKinney	Southern Bell Telephone & Telegraph Co.
73. Don G. Hardister	Chief of Security, Heritage, U.S.A.
74. Tom Oliphant	Loss Prevention Operation Manager, Carowinds Theme Park
75. Eric Helms	Carowinds Theme Park

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Dockets Nos. 50-413
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Application by Palmetto Alliance and Carolina Environmental Study Group for Issuance of Subpoenas" in the above-captioned matter have been served upon the following by deposit in the the United States mail this 17th day of April 1984.

Morton B. Margulies, Chairman
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Washington, D. C. 20555

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Ann Arbor, Michigan 48109

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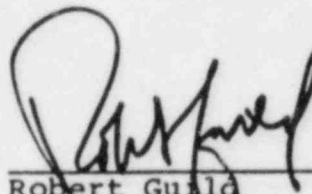
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Respectfully submitted,



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