

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC
May 12, 1984

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

OFFICE OF SECRETARY
MARKETING & SERVICE
BRANCH

In the Matter of

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

Docket 50-400 OL

ASLBP No. 82-468-01
OL

Request for Approval of Filing Reply
to Applicants' 5-8-84 "Answer" re Eddleman
Motion for Leave to Take Depositions

Under 2.730(c) I hereby request leave to file the following
reply to Applicants' "Answer" received this date, dated 5-8-84.
The reply is limited to pointing out errors of fact in the "Answer".
I believe that pointing out these errors is good cause to allow this
filing, since letting them go unchallenged would prejudice my case.

Reply: (1) Applicants know my name and address (see Answer, p.5 top)
and the subject matter of the depositions is Eddleman 65 as Applicants
know from oral communication. (2) Applicants allege (p.7) that I didn't
request the documents from which the individuals' names could be derived,
in my first round of discovery. Not so. The documents including the
names were asked to be produced, but Applicants objected. They have
since ^{April} (March 1984) agreed to produce all the pour packages for the
concrete in the Harris base mat, walls and dome of containment, and I
requested them to simply make copies of all of such information; but as
yet I have not received anything but the March 23 documents.

In addition, my first 8 interrogatories ask how + sometimes who does you ask -
(3) Applicants themselves asked a delay in responding to my January
30, 1984, discovery requests. (4) ^{Applicants} Provision of false or misleading
answers is surely basis for thinking depositions might find others.

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Shearon Harris Nuclear Power Plant, Unit 1)

Docket: 50-400
O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of Request for Approval of Filing
Reply to Applicants' 5-8-84 "Answer" to Eddleman Motion for Leave
to Take Depositions

HAVE been served this 12 day of April 1984, by deposit in

the US Mail, first-class postage prepaid, upon all parties whose
names are listed below, except those whose names are marked with

an asterisk, for whom service was accomplished by _____

NB Perry of FEMA was served with 5-11/570 Filings re Eplan
+ EPZ map
NE

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)
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US Nuclear Regulatory Commission
Washington DC 20555

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Ruthanne G. Miller
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USNRC Washington DC 20555

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USNRC
Washington DC 20555

(EPLAN DOCUMENTS ONLY)
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Docketing and Service Section (3x)
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Certified by

W. Eddleman