

RELATIVE CORRESPONDENCE

DOCKETED March 15th, 1984

UNITED STATES OF AMERICA '84 MAR 19 AIO:20
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING & SERVICE
BRANCH

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)

Docket Nos. 50-400 OL
50-401 OL

(Shearon Harris Nuclear Power Plant,)
Units 1 & 2))

APPLICANTS' INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS ON WELLS EDDLEMAN'S CONTINUTION 132C(II) (SECOND SET)

Pursuant to 10 C.F.R. §§ 2.740(b) and 2.741, Applicants Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that Intervenor Wells Eddleman answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below. Under the Commission's Rules of Practice, answers or objections to these interrogatories must be served within 14 days after service of the interrogatories; responses or objections to the request for production of documents must be served within 30 days after service of the request.

These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, pursuant to 10 C.F.R. § 2.740(e), should you or any individual acting on your behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and you must produce immediately any additional documents you, or any individual acting on your behalf, obtain which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

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Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, transcript, report, handwritten notes, test data) and provide the following information as applicable: document name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person or persons having possession of the document. Also state the portion or portions of the document (whether section(s), chapter(s), or page(s)) upon which you rely.

Definitions: As used hereinafter, the following definitions shall apply:

"Applicants" is intended to encompass Carolina Power & Light Company, North Carolina Eastern Municipal Power Agency and their contractors for the Harris Plant.

"Document(s)" means all writings and records of every type in the possession, control or custody of Wells Eddleman or any individual acting on his behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of Mr. Eddleman; a document shall be deemed to be within the "control" of Mr. Eddleman or any individual acting on his behalf if he has ownership, possession or custody of the document or copy thereof, or has the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof.

GENERAL INTERROGATORIES

1(a). State the name, present or last known address, and present or last known employer of each person, other than affiant, who provided information upon which you relied in answering each interrogatory herein, or who otherwise assisted you in answering each interrogatory herein.

(b). Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

(c). For each such person who provided you with information upon which you relied in answering any interrogatory herein or who assisted you in answering any interrogatory herein and who is an expert (i) provide that person's expertise and facts supporting his expertise, (ii) if that person has been "retained or specially employed," state in detail the facts underlying any "retained or specially employed status," (iii) if that person's identity is being withheld, (A) explain the need to withhold such person's identity, (B) state the protection or privilege upon which you rely in withholding the person's identity (see Licensing Board's Memorandum and Order of May 27, 1983).

(d). For each such person who provided you with information upon which you relied in answering any interrogatory herein or who assisted you in answering any interrogatory herein and who is not an expert, identify that person in accordance with the Licensing Board's Memorandum and Order of May 27, 1983.

2(a). Identify all documents in your possession, custody or control, including all relevant page citations, upon which you relied in answering each interrogatory herein.

(b). Identify the specific interrogatory response(s) to which each such document relates.

3(a). Identify any other source of information, not previously identified in response to Interrogatory 1 or 2, which was used in answering the interrogatories set forth herein.

(b). Identify the specific interrogatory response(s) to which each such source of information relates.

4. If you or any individual(s) acting on your behalf have obtained any new or differing information responsive to Applicants General Interrogatories 1 through 7 on Contention 132C(II) filed January 24, 1984, please supplement or amend as appropriate your previous responses (filed March 7, 1984) and identify all documents upon which you relied in supplementing or amending those responses.

INTERROGATORIES ON EDDLEMAN CONTENTION 132C(II)

INTERROGATORY NO. 132C(II)-6(a). In your answer to Interrogatory 132C(II)-1(a) you stated that "It is not possible to give distances in feet on this chart since Figure 2 has an inconsistent scale." Please now provide the distances in feet requested in Interrogatory 132C(II)-1(a) utilizing the scale drawing attached hereto as Attachment 1.

(b). For each of the positions identified in your answer to Interrogatory 132C(II)-1(a) where you stated that the view of some panels was blocked by others, please provide in as specific terms as possible all information (please identify all dials, readouts, indicators or other items providing information to operators) which you contend would be out of view of the operator but which is necessary for the operator "to see, read accurately, or integrate."

(c). Please provide all facts, documents, and other information which would support your statement made in answer to Interrogatory 132C(II)-1(b)(ii) that "it is clear that during an accident operators could not just read panels from distances that appear to be on the order of 25 or 30 feet on your not-to-scale drawing of the control room, DCRDR 'Figure 2.'" Please utilize Attachment 1 in providing your response hereto.

(d). Please respond completely and fully to Interrogatory 132C(II)-1(c) based upon Attachment 1.

(e). Please respond completely and fully to Interrogatory 132C(II)-1(d) based upon Attachment 1 and your answer to (d) above.

INTERROGATORY NO. 132C(II)-7(a). In regards to your answer to Interrogatory 132C(II)-2, please provide in as specific terms as possible all information which you contend would be shown on equipment panel #7 (Condensate Booster Hydraulic Control Cabinet) which would be out of view of the operator but which is necessary for the operator "to see, read accurately, or integrate."

(b). If you continue to contend that you require further discovery before you can respond to (a), please provide in detail the basis for your concern expressed in Contention 132C(II) that "#6 and 7 are hidden from operators by 1 and 2"

INTERROGATORY NO. 132C(II)-8. In regards to your answer to Interrogatory 132C(II)-3(a), please provide in as specific terms as possible all information which you contend would be shown on equipment panel #6 (Cooling Tower and River Water Make-up Control Cabinet) which would be out of view of the operator but which is necessary for the operator "to see, read accurately, or integrate."

INTERROGATORY NO. 132C(II)-9. Please provide in detail all facts and other information and identify all documents which support your statement made in response to Interrogatory 132C(II)-4(a) that Applicants "are in violation of GDC 1 (10 C.F.R. 50 App. A) because the control room is inadequate to its purpose and functions."

INTERROGATORY NO. 132C(II)-10. Please provide in detail all facts and other information and identify all documents which support your statement made in response to Interrogatory 132C(II)-4(a) that Applicants are "also in violation of GDC 19 because [Applicants] can't maintain the plant in a safe condition under serious (e.g. LOCA) accidents."

INTERROGATORY NO. 132C(II)-11. Please provide in detail all facts and other information and identify all documents which support your statement made in response to Interrogatory 132C(II)-5(b) that "the signal density analysis on pp 6-11 is just exactly backwards of what is needed for accidents"

INTERROGATORY NO. 132C(II)-12. Please provide in detail all facts and other information and identify all documents which support your statement made in response to Interrogatory 132C(II)-5(b) that "under emergency conditions the control room lighting could flicker or not be 100%."

INTERROGATORY NO. 132C(II)-13. Please provide in detail all facts and other information and identify all documents which support your statement made in response to Interrogatory 132C(II)-5(b) that "few people have depth perception accurate enough to judge such small offsets at distance."

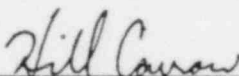
INTERROGATORY NO. 132(II)-14. Please provide the sepcific dates on which you intend to "dig out what [you] have on [Interrogatory 132C(II)-6] that is readily accessible and . . . identify it to Applicants and produce at a mutually agreeable place and time for inspection and copying."

INTERROGATORY NO. 132C(II)-15. What is the subject matter of the one videotape in your possession?

REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Mr. Eddleman respond in writing to this request for production of documents and produce the original or best copy of each of the documents identified or described in the answers to each of the above interrogatories at a place mutually convenient to the parties.

This the 15th day of March, 1984.



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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Interrogatories and Request for Production of Documents on Wells Eddleman's Contention 132c(II) (Second Set)", were served this 15th day of March, 1984 by deposit in the United States mail, first class, postage prepaid, to the parties on the attached Service List.

This the 15th day of March, 1984.

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