

RELATE

RELATED CORRESPONDENCE

DOCKETED
NRC

13 March 1984
served by hand to CP&L
(when they come by my
home to pick up S.G.
(Joint 7) documents)
served to others 3-19

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

In the Matter of

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

Docket 50-400 OL

ASLBP No. 82-468-01
OL

Document Listing on Discovery
(supplemental listing)

Pursuant to conversations with Applicants' counsel O'Neill and Hollar, Wells Eddleman provides the following list of documents in his possession. Under the April 1983 agreement between Eddleman and O'Neill, only documents which are not (1) NRC documents or (2) in CP&L's possession, need be produced on discovery.

132(c)(2): NUREG/CR 1278 (Parts I and II): Handbook of Human Reliability Analysis with Emphasis on Nuclear Power Plant Applications
NUREG-0801 "Draft: For Comment" re DCRDR implementation

Joint I: A fast review of the working "management" file shows that it contains the E-2 sub 444 (CP&L General Rate case) "Jacobstein Report" investigating the CP&L Brunswick nuclear plant, and some Exhibits thereto, e.g. ARJ 7. I believe all Jacobstein's exhibits are in file I possess. Other than that and drafts of the Joint Intervenor's interrogatories to CP&L, the documents are all CP&L-originated, or NRC-originated, except: CP&L SEC Form 10-K for year ended 12-31-1980; Charlotte Observer p.1C of 2-19-83: NRC Imposes Largest Fine Ever Against CP&L; Raleigh News & Observer, Feb 19, 1983 (pp 1A and 6A) Record Fine Proposed For CP&L. I will lend these to Dale Hollar today for copying, along with the "S.G. Box" on Joint 7 and two items re 15AA and Joint I received this weekend, the summary of the OTA report "Nuclear Power in an Age of Uncertainty" and the report "Is the Peaceful Atom a Good Investment".

I have also referred Applicants' counsel to the references of my original contention 3 and other contentions superseded by Joint I. At the request of Applicants' counsel Samantha Flynn, I am reviewing Eddleman 3 to try to specify the references more in detail. This contention is at pages 31-45 of my 5-14-82 (contentions) supplement to petition to intervene.

(see separate update re Joint Intervenor's info in making Joint I and its precursors, also).

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Listing of W.E. documents for CP&L (supplemental listing)

Joint 3 (a) has highly specific references. (b) is same info base as (a). (c) refers to a lack of information.

(d) has a highly specific reference to Jacobstein's report re Brunswick (5-14-82 at 33). Page 34 (middle), C.E. Murphy memo is from Region II construction branch, NRC. I believe it is in an appendix to UCS's "Browns Ferry: the Regulatory Failure" which is probably somewhere in my files but not readily found today.

the IEEE report I refer to, I believe is a report not made publicly available. You could check with IEEE about it. I don't have a copy to my knowledge.

Further Jacobstein references are on p.35, for part (d).

(e) also on p.35, references Jacobstein specifically. I haven't located the Brunswick internal memo referred to on that page, and may never have had a copy, though I have seen one. CP&L admitted being the only offsite LLRW releaser, see responses to interrogatories on Eddleman 67.

(f) on page 36, line 4, should read "of" inability to respond, not "if". I don't have transcript references to the 1979 remands handy, but I recall J.A. Jones vehemently denying that CP&L would ever operate a plant in an unsafe manner (nuclear plants). Dr. Leeds' questioning of CP&L comes toward the end of the hearing as I recall. There's a lot about the watertight doors and their alarms in Cantrell's prefiled, possibly his exhibits, and in the transcript.

(g) reference to E-2 sub 416 is to public hearing at Wilmington NC. I believe CP&L has a transcript of that case. Shackelford's phone is now 919-762-6121; address is same. I don't have the date or cite to the reporter.

(h) references given. (H2) is based on news reports, my memories of information, and does not list documents. (I) the pay cut is a news report. I'm not sure what date, probably Raleigh N&O. CP&L 74-75 pay cuts, 50-400 remand see Jones testimony and cross, etc.; "Brunswick Improvement Program" of 1982 (did not exist when contention filed) compare w/ "earnings improvement program" of 1974-75. P.45 should come between 42 and 43.