

March 13, 1984  
Hand-served on CP&L today

54

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Served to others 3-19  
DOCKETED  
USNRC

(2)

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD<sup>84</sup> MAR 22 AIO:31

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)

Docket 50-400 OL

ASLBP No. 82-468-01  
OL

Joint Intervenors Second Supplement to Answers  
to Applicants Interrogatories on Joint I  
(Management Incapability for Harris)

On behalf of Joint Intervenors, Wells Eddleman hereby adds to the supplement recently filed by Travis Payne: Joint Intervenors are looking through our files for additional documents that may have been used in formulating contentions superseded by Joint I. Also:

In formulating Eddleman contentions on management capability, Wells Eddleman's memories of (and possibly some copies of) the record of general rate cases (E-2 sub 391, sub 416) sub-446 and other fuel clause cases including the emergency petition in E-2 sub 425 before the NCUC, esp testimony of Ben J. Furr and others in such cases, and CP&L's LFR reports to NRC for Brunswick, Robinson and Farris, CP&L's baseload powerplant performance reports to NCUC, (R8-45 filings), CP&L's E-100 sub 38 Quarterly CWIP Progress Reports to NCUC, CP&L's operating and fuel (F&O) reports to NCUC, load forecast hearings including F-100 sub 35 and E-100 sub 40, and the transcript and record of the 1979 remand hearing in NRC dockets 50-400/403 on management capability, including testimony and exhibits of F.S. Cantarell (the NRC inspector whose views had not been given to the Harris CP board at the CP stage), Board Exhibit 8, and cross and direct examination of CP&L witnesses therein, etc. were likely used.

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PDR ADDUCK 05000400  
PDR

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NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al. )  
Shearon Harris Nuclear Power Plant, Units 1 and 2 )

Docket 50-400  
O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of 3-17 and 3-19 letters to Tom Baxter,  
Joint Intervenor's Interrogatories  
to Applicants on Joint Contention VII, J.K.-2d supplement to answers to  
Applicants on Joint I and W.F.'s Document Listing on Discovery  
HAVE been served this 19 day of March 1984, by deposit in (supplemental)  
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 Applicants have  
already been given all but the interrogatories and 3-19 letter; the  
Board and NRC D&S and OELD have the 3-17 letter; only Judge Kelley for Bd  
and CA Barth OELD get the interrogatories per oral order (for Bd & Staff)  
\*Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)  
Atomic Safety and Licensing Board  
US Nuclear Regulatory Commission  
Washington DC 20555

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USNRC Washington DC 20555

\* Office of the Executive Legal Director  
Attn Dockets 50-400/401 O.L.  
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\* Docketing and Service Section (3x)  
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Certified by

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