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October 25, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	
AND NORTH CAROLINA EASTERN)	Docket Nos. 50-400 OL
MUNICIPAL POWER AGENCY)	50-401 OL
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

APPLICANTS' INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
TO JOINT INTERVENORS (FIFTH SET)

Pursuant to 10 C.F.R. §§ 2.740b and 2.741 and to the Atomic Safety and Licensing Board's "Memorandum and Order (Reflecting Decisions Made Following Prehearing Conference)" of September 22, 1982, Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency hereby request that Joint Intervenor (Kudzu Alliance, CCNC, CHANGE/ELP and 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 the interrogatories below. Under the Commission's Rules of

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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 Joint Intervenors or any individual acting on their behalf obtain any new or differing information responsive to these interrogatories. The request for production of documents is also continuing in nature and Joint Intervenors must produce immediately any additional documents they, or any individual acting on their behalf, obtain which are responsive to the request, in accordance with the provisions of 10 C.F.R. § 2.740(e).

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 Joint Intervenors rely.

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

The "ER" is the Environmental Report - Operating License Stage for the Shearon Harris Nuclear Power Plant, as amended.

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

"Joint Intervenors" is intended to encompass the following organizations and individuals, jointly and severally: Chapel Hill Anti-Nuclear Group Effort, the Environmental Law Project, the Conservation Council of North Carolina and the Kudzu Alliance, as organizations, their members, and their representatives, and Mr. Wells Eddleman.

"Document(s)" means all writings and records of every type in the possession, control or custody of Joint Intervenors or any individual acting on their 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 Joint Intervenors; a document shall be deemed to be within the "control" of Joint Intervenors or any individual acting on their behalf if Joint Intervenors or the individual acting on their behalf have ownership, possession or custody of

the document or copy thereof, or have 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 known to Joint Intervenors to have first-hand knowledge of the facts alleged, and upon whom Joint Intervenors relied in formulating allegations in the contention which is the subject of this set of interrogatories.

(b). Identify those facts concerning which each such person has first-hand knowledge.

(c). State the specific allegation in the contention which Joint Intervenors contend such facts support.

2(a). State the name, present or last known address, and present or last employer of each person, other than affiant, who provided information upon which Joint Intervenors relied 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.

3(a). State the name, address, title, employer and education and professional qualifications of each person Joint Intervenors intend to call as an expert witness or a witness

relating to the contention which is the subject of this set of interrogatories.

(b). State the subject matter to which each such person is expected to testify.

4(a). Identify all documents in Joint Intervenors' possession, custody or control, including all relevant page citations, pertaining to the subject matter of, and upon which Joint Intervenors relied in formulating allegations in the contention which is the subject of this set of interrogatories.

(b). Identify the specific allegation in the contention to which each such document relates.

(c). State the specific allegation in the contention which Joint Intervenors contend each document supports.

5(a). Identify all documents in Joint Intervenors' possession, custody or control, including all relevant page citations, upon which Joint Intervenors relied in answering each interrogatory herein.

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

6(a). Identify any other source of information, not previously identified in response to Interrogatory 2 or 5, 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.

7(a). Identify all documents which Joint Intervenors intend to offer as exhibits during this proceeding to support the contention which is the subject of this set of interrogatories or which Joint Intervenors intend to use during cross-examination of witnesses presented by Applicants and/or the NRC Staff on the contention which is the subject of this set of interrogatories.

(b). Identify the particular page citations of each document applicable to this contention.

INTERROGATORIES ON JOINT CONTENTION VI (RADIATION DETECTION AND MONITORING)

VI-8(a). Do Joint Intervenors contend that the radiation monitoring system, as described in FSAR § 11.5.2.5, is the sole source of information utilized to protect the health and safety of personnel and the public during an emergency situation at SHNPP?

VI-9(a). Do Joint Intervenors contend that the radiation detectors described in FSAR § 11.5.2.5 are inadequate to assure that emergency response personnel receive timely and accurate information?

(b). If the answer to VI-9(a) is affirmative, supplement the response previously made to Interrogatory VI-1 (propounded on January 31, 1983) by:

- (1) identifying each detector that is alleged to be inadequate; and

- (2) for each detector and model identified, describing in detail each alleged inadequate function; and
- (3) identifying each location where Joint Intervenors contend that additional detectors are necessary.

Describe in detail all facts and documents which support these responses.

(c). Explain in detail how each inadequacy alleged in response to Interrogatory VI-9(b)(2) and (3) poses a significant hazard to personnel or public health and safety.

(d). If the answer to Interrogatory VI-9(a) is other than affirmative, explain in detail how this response is consistent with the allegations set forth in Joint Contention VI.

(e). For each inadequacy alleged in response to Interrogatory VI-9(b), describe in detail the information Joint Intervenors contend should be provided by the radiation detectors alleged to be inadequate or by additional radiation detectors and describe in detail all facts and documents which support this conclusion.

(f). Explain in detail how Joint Intervenors believe the information identified in response to Interrogatory VI-9(e) could be used, including a description of additional responsive measures that could be undertaken by emergency personnel and an explanation of how these measures would result in less risk to

the health and safety of personnel or the public. Describe in detail all facts and documents which support this conclusion.

VI-10(a). Complete the first sentence of Joint Intervenor's response to Interrogatory No. VI-3(a) by filling in the missing word or phrase.

VI-11(a). Do Joint Intervenor's contend that Applicants' monitoring system must be capable of identifying and monitoring each radionuclide identified in 10 C.F.R. Part 20, Appendix B?

(b). If the answer to Interrogatory VI-11(a) is affirmative, describe in detail all facts and documents upon which Joint Intervenor's rely in support of this response.

(c). If the answer to Interrogatory VI-11(a) is affirmative, for each radionuclide identified in 10 C.F.R. Part 20, Appendix B, state the radiation type and energy level that is believed to be emitted from such radionuclide source and the relative amount of radiation which Joint Intervenor's expect to result from such source. Describe in detail all facts and documents which support this conclusion.

(d). If the answer to Interrogatory VI-11(a) is other than affirmative, explain in detail how this response is consistent with the allegations set forth in Joint Intervenor's response to Interrogatory VI-3(b).

(e). If the answer to Interrogatory VI-11(a) is other than affirmative, identify each radionuclide that Joint Intervenor's contend must be specifically identified and monitored.

Describe in detail all facts and documents which support this response.

(f). For each radionuclide identified in response to Interrogatory VI-11(e), state the radiation type and energy level that is believed to be emitted from such source and the relative amount of radiation which Joint Intervenors expect to result from such source. Describe in detail all facts and documents which support this response.

VI-12(a). Do Joint Intervenors contend that Applicants' alleged failure to detect and monitor each specific radionuclide identified in 10 C.F.R. Part 20, Appendix B or in response to Interrogatory VI-11(e) will result in incorrect responses by emergency personnel?

(b). If the answer to Interrogatory VI-12(a) is affirmative, explain in detail how additional data obtained from identification of specific radionuclides could be used, including a description of additional responsive measures that could be undertaken by emergency personnel and an explanation of how those measures would result in less risk to the health and safety of personnel or the public.

(c). If the answer to Interrogatory VI-12(a) is other than affirmative, explain in detail how that response is consistent with the allegations set forth in Joint Contention VI.

VI-13(a). Do Joint Intervenors contend that the standards set forth in 10 C.F.R. Part 50, Appendix I, apply to all accidental and emergency conditions?

(b). If the answer to Interrogatory VI-13(a) is affirmative, identify the regulation or portion thereof that extends the provisions of 10 C.F.R. Part 50, Appendix I to accidental and emergency conditions.

(c). If the answer to Interrogatory VI-13(a) is affirmative, describe in detail any source other than that identified in response to Interrogatory VI-13(b) upon which Joint Intervenor's rely in support of their response to Interrogatory VI-13(a).

(d). If the answer to Interrogatory VI-13(a) is other than affirmative, explain in detail what "As Low As Reasonably Achievable" means when applied to accident and emergency conditions. Describe in detail all facts and documents upon which Joint Intervenor's rely in support of this conclusion.

VI-14(a). Do Joint Intervenor's believe that Applicants' system for monitoring tritium is inadequate to assure that emergency response personnel receive timely and accurate information?

(b). If the answer to Interrogatory VI-14(a) is affirmative, explain in detail each inadequacy alleged and describe in detail all facts and documents which support this conclusion.

(c). Do Joint Intervenor's believe that the inadequacies alleged in response to Interrogatory VI-14(b) pose a significant risk to health and safety of employees or the public?

(d). If the answer to Interrogatory VI-14(d) is affirmative, describe in detail all facts and documents upon which Joint Intervenors rely in support of their response to Interrogatory VI-14(d).

(e). If the answer to either Interrogatory VI-14(a) or VI-14(c) is other than affirmative, explain in detail the relevance of Joint Intervenors' Interrogatory No. 21 (propounded on June 27, 1983).

VI-15(a). Do Joint Intervenors contend that appropriate responses to emergency situations are not assured because the laboratory analyses of effluent samples are inadequate?

(b). If the answer to Interrogatory VI-15(a) is affirmative, describe in detail every inadequacy that is alleged and describe all facts and documents which support this conclusion.

(c). For each inadequacy alleged in response to Interrogatory VI-15(b), describe in detail the information Joint Intervenors contend should be provided by the analyses alleged to be inadequate and describe in detail all facts and documents which support this conclusion.

(d). For each corrective measure suggested in response to Interrogatory VI-15(c), explain in detail how this information could be used, including a description of additional responsive measures that could be undertaken by emergency personnel and an explanation of how those measures would result in less risk to the health and safety of personnel or the public.

VI-16(a). Do Joint Intervenors contend that the monitoring system described in Applicants' FSAR cannot compile effluent release data in a timely manner to assure prompt detection of accident conditions?

(b). If the answer to Interrogatory VI-16(a) is affirmative, identify each component or process of the monitoring system that is alleged not to provide timely data.

(c). For each component or process identified in response to Interrogatory VI-16(b) state the length of time for data production that Joint Intervenors believe would be sufficient for adequately detecting an accident condition. Describe in detail all facts and documents which support this response.

(d). Do Joint Intervenors believe that equipment is commercially available that can produce data within the time stated in response to Interrogatory VI-16(c)?

(e). If the response to Interrogatory VI-13(d) is affirmative, identify the manufacturer; model number and accuracy level, for each radionuclide monitored, of each piece of equipment that can achieve the timeliness specifications identified in response to Interrogatory VI-16(c).

(f). If Joint Intervenors identified a process in response to Interrogatory VI-16(b), describe in detail a process that Joint Intervenors believe could be used to assure the proposed time limit set forth in response to Interrogatory VI-16(c).

(g). Are Joint Intervenors aware of any nuclear power plant that uses the process described in response to Interrogatory VI-16(f)?

(h). If the answer to Interrogatory VI-16(g) is affirmative, identify the plant and the person at the plant who is in charge of radiological monitoring.

(i). Are Joint Intervenors aware of any nuclear power plant that uses the equipment identified in response to Interrogatory VI-16(e)?

(j). If the answer to Interrogatory VI-16(i) is affirmative, identify the plant, the manufacturer model number and accuracy, for each radionuclide monitored, of the equipment used and the person at the plant who is in charge of radiological monitoring.

VI-17(a). Explain in detail the meaning of the phrase "accuracy of radiation records" contained in Joint Intervenors' response to Interrogatory VI-6(b).

(b). Explain in detail how the portion of the response to Interrogatory VI-6(b) quoted above is relevant to Joint Contention VI.

(c). State in detail the accuracy of radiation records Joint Intervenors believe is required. Describe in detail all facts and documents which support this conclusion.

VI-18(a). Explain in detail the meaning of the phrase "[t]he information for radiation surveys is not specified"

contained in Joint Intervenors' response to Interrogatory VI-6(b).

(b). Explain in detail how the portion of the response to Interrogatory VI-6(b) quoted above is relevant to Joint Contention VI and describe in detail all facts and documents which support this conclusion.

(c). Explain in detail the "information for radiation surveys" that Joint Intervenors believe should be specified and describe in detail all facts and documents which support this conclusion.

VI-19(a). The third sentence of Joint Intervenors' response to Interrogatory VI-6(b) states that "[T]he micro-processors can only withstand 1,000 rads, so long-term post-LOCA monitoring is not assured." Describe in detail all facts and documents upon which Joint Intervenors rely in support of the allegation that long-term post-LOCA monitoring is not assured.

(b). Explain in detail the measures that Joint Intervenors believe would be sufficient to assure long-term monitoring and describe in detail all facts and documents which support this conclusion.

VI-20(a). The fourth sentence of Joint Intervenors' response to Interrogatory VI-6(b) states that "[t]he locations of monitors do not assure detection of all movements of radioactivity in the plant." Describe in detail all facts and documents which support this statement.

(b). Identify each inadequacy in the placement of monitors and for each inadequacy identified, state the type of radiation, energy level and amount of such radioactivity that is likely to be undetected due to inadequate placement of monitors and describe in detail all facts and documents which support this conclusion.

(c). Explain in detail the system of monitor placement that Joint Intervenors believe would assure detection of all "movements of radioactivity" and describe in detail all facts and documents which support this conclusion.

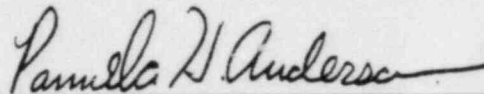
(d). Are Joint Intervenors aware of any nuclear power plant that uses the system of monitor placement described in response to Interrogatory VI-20(c)?

(e). If the answer to Interrogatory VI-20(d) is affirmative, identify each plant and the person at each plant who is in charge of radiological monitoring.

Request for Production of Documents

Applicants request that Joint Intervenors 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.

Respectfully submitted,



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Dated: October 25, 1983