

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETER
UNITED STATES

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHGlenn O. Bright
Mr. 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)Dockets 50-400 OL
50-401 OL

8 October 1984

EMERGENCY PLANNING INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
TO APPLICANTS

Pursuant to 10 C.F.R. 2.740 et seq. and the orders of the Board (particularly that of 3 August 1984), CHANGE hereby requests that Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency (hereinafter "Applicants") answer separately, fully, and in writing, and under oath or affirmation, each of the following interrogatories, and produce and permit inspection and copying of all documents identified in the responses to said interrogatories. Answers or objections to these interrogatories and responses or objections to the request for production of documents must be served no later than 29 October 1984. These interrogatories and the request for production of documents are intended to be continuing in nature and answers should be promptly supplemented or amended, or additional documents immediately produced, as appropriate, should Applicants or their agents obtain new or differing information or responsive documents, as provided by 10.C.F.R. 2.740.

GENERAL INTERROGATORIES

Responses to these general interrogatories shall be given for each contention, along with the responses to each specific interrogatory.

- (1) State the name, present or last known address, and present or last known employer of each person known to Applicants to have first-hand knowledge on which the responses are based, for each of the contentions which are the subject of this set of interrogatories.
- (2) Identify those facts concerning which each such person has first-hand knowledge.
- (3) State the specific basis or facts which support each response. To the extent that Applicants rely solely upon documents for their response(s), please indicate the documents by their title, date, author, and location. Please identify also relevant page citations.
- (4) State the name, present or last known address, and present or last known employer of each person who provided information upon which Applicants relied in answering each interrogatory herein.
- (5) Identify all such information which was supplied by each such person and the specific interrogatory response in which such information is contained.
- (6) State the name, address, title, employer, and educational and professional qualifications of each person Applicants intend to call as an expert witness or as a witness relating to any contention which is the subject of this set of interrogatories.
- (7) Identify the contention(s) regarding which each person identified in interrogatory (6) is expected to testify, and the subject

matter as to which each such witness is expected to testify.

(8) Identify all documents in Applicants' possession, custody or control, including all relevant page citations, pertaining to the subject matter of, and upon which the Applicants relied in formulating responses to, each contention which is the subject of this set of interrogatories.

(9) State the specific response to each contention or interrogatory which Applicants contend each document supports.

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

(11) Identify all other sources of information, not identified in responses to General Interrogatories 5, 8, and 11 herein, which were used in answering each interrogatory herein.

(12) Identify all documents which Applicants intend to offer as exhibits during this proceeding to refute contentions which are the subject of this set of interrogatories.

DEFINITIONS

As used herein, the word "study" or "studies" shall not mean only documents titled as such, but it means such documents and other documents or activities involving critical examination and investigation of a subject, see New World Dictionary of the American Language, 2d College Edition, 1974.

"Applicants" means Carolina Power & Light Co., N.C. Eastern Municipal Power Agency, their contractors, agents, designees, or other persons acting in their behalf.

SPECIFIC INTERROGATORIES

EPJ-1-1. Identify all studies or examinations of snow and ice conditions in the area around the Shearon Harris plant Applicants have conducted or considered in assessing the effect of inclement weather on the plant, evacuation times, traffic around the plant, shutdown analyses, or shift changes.

EPJ-1-2. Identify any data compilations Applicants have considered in assessing or predicting the effect of inclement weather on any of the activities/subjects described in EPJ-1-1.

EPJ-1-3. Identify all snow, ice, or other removal equipment (a) at the plant site, (b) within one mile of the plant, (c) upon which Applicants rely to keep roads to the plant open under non-accident conditions.

EPJ-1-4. How do Applicants understand "severe snow and ice conditions" as stated in the contention?

EPJ-2-1. Identify all studies or other/data known to Applicants which provide information or guidance on problems of identifying, notifying, and providing transportation for people without cars in accident or disaster situations.

EPJ-2-2. Identify all studies or examinations of the number and location of people without cars Applicants have undertaken or are aware of with respect to evacuation from the area around the Harris plant in an emergency.

EPJ-4-1. Have Applicants undertaken to identify school bus drivers 18 years of age or younger? If the answer is other than "no", please produce results of any such efforts. (For this and all other questions relevant to EPJ-4, the questions refer to the 10-mile EPZ area unless otherwise specified).

EPJ-4-2. Identify all studies or other evaluations Applicants have made concerning the necessity for school buses to make more than one trip during normal and emergency conditions.

EPJ-4-3. Identify all provisions Applicants have made, or are aware have been made, for the availability of extra buses to transport school children in an emergency situation, (a) including accidents at the Harris plant and (b) including other disasters, emergencies, acts of war, or of God.

EPJ-4-4. Identify all provisions, other than ^{those in} the Emergency Preparedness Brochure, Applicants have made, or are aware of, to notify parents of school age children that they should not pick up their children at schools in the event of an evacuation. Identify all provisions made, by Applicants or others, to ensure that parents of school age children will not pick up their children at school in the event of an evacuation.

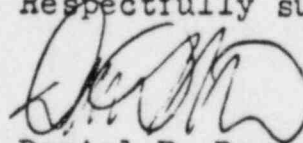
EPJ-4-5. Identify all studies Applicants have made, used, or are aware of which deal with the ^{general} problem of parents picking up school children in an evacuation situation or other similar emergency situation.

EPJ-4-6. Identify any ^{parental} authorization currently required for bus drivers under age 18 to operate school buses in the event of an emergency.

Request for Documents

CHANGE requests that Applicants produce the original or best available copy of each document identified in the responses the foregoing general and specific interrogatories at a mutually convenient location as may be established by subsequent arrangement, in accordance with the time schedule set out at page 1 above.

Respectfully submitted,



Daniel F. Read
CHANGE

P.O. Box 2151

Raleigh, NC 27602

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

In the Matter of CAROLINA POWER & LIGHT CO.
et al., Shearon Harris Nuclear Plant, Units 1 & 2

Dockets
850-400, 50-401

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CERTIFICATE OF SERVICE

OCT 8, 1984

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

I hereby certify that copies of EP Interrogatories and Request for Production of Documents To Applicants were served this 8 day of October, 1984, by deposit in the U.S. Mail, first-class postage prepaid, upon all parties whose names appear below, except those whose names are marked with an asterisk, for whom service was accomplished by hand delivery.

James L. Kelley, Esq./Mr. Glenn O. Bright/Dr. James Carpenter
Atomic Safety & Licensing Board (one each)
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Thomas Baxter, Esq.
Shaw, Pittman, Potts & Trowbidge.
1800 M St. NW
Washington, DC 20036

Mr. John D. Bunkle
Conservation Council of North Carolina
307 Granville Road
Chapel Hill, NC 27514

Robert P. Gruber, Dir.
Public Staff, NCUC
P.O. Box 991
Raleigh, NC 27602

M. Travis Payne, Esq.
Edelstein and Payne
P.O. Box 12463
Raleigh, NC 27605


Mr. Wells Eddleman
718-A Iredell Street
Durham, NC 27705

Dr. Richard D. Wilson
729 Hunter Street
Apex, NC 27502

Ruthanne Miller
ASLB Panel
USNRC, Washington, DC 20555

Bradley W. Jones
Reg. Counsel USNRC Reg II
101 Marietta St, NW Suite 2900
Atlanta, GA 30303

Richard E. Jones/Dale Keller
Assoc. General Counsel, CP&L
PO Box 1551
Raleigh, NC 27602


Daniel F. Read
CHANGE
P.O. Box 2151
Raleigh, NC 27602