

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

October 8, 1984

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

OFFICE OF PUBLIC AFFAIRS
DOCKETING & SERVICE
BRANCH

In the Matter of

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

Docket 50-400 OL

ASLBP No. 82-468-01
OL

Wells Eddleman's General Interrogatories
and Interrogatories and Request for
Production of Documents to FEMA/NRC Staff

General Interrogatories: A. Please provide answers to any general interrogatory in the 9/5/84 set for which the answer has now changed.

B. Has a copy of the NRC-FEMA Memorandum of Understanding been previously provided to Wells Eddleman by the Staff(s)? If not, are you willing to provide a copy?

C. Do either FEMA Staff or NRC Staff have any objection to me or persons working on my behalf observing the test of the Harris emergency plan when it happens? Are you willing to work out arrangements for such observation? If you have objections, what are they? Do you believe any of these objections could be resolved on an informal basis (e.g. without a Board ruling)? If so, which?

Request for Production of Documents

Wells Eddleman hereby requests that the original or best copy or a fully legible copy of any documents identified in response to interrogatories herein, be made available to him for inspection and copying at a mutually agreeable time and place, or that such document be placed in the NRC's Public Document Room and its location/identifier or identifying information be made available to him.

240-4(a) is it still true that you can't identify any documents in response to interrogatory 240-3? (b) If you can't identify the documents, what is the basis (if any) for each answer to each part of your previous responses to all parts/subparts of 240-1 and 240-2? Please give the basis separately for each part and subpart of each of 240-1 and 240-2. (c) What specific cites to the ERP for Harris can you make in response to 240-2(d)? (d) What information, if any, will you provide as a supplemental answer to 240-3?

213-A-4: Please provide actual answers to the parts of interrogatories 213-A-1, 213-A-2, and for 213-A-3 as previously served.

213-A-5(a) Please state exactly what the nature of the review of item P-7 of NUREG-0654 which was performed by (i) the RAC (ii) FEMA Staff, was, and when it was done and by whom. (b) Please describe exactly what it is in the ERP that meets criterion II.P.7 (c) How do you interpret the term "in the plan"-- to be cited, to be included, or some other interpretation (please specify). (d) How ~~do~~ do you interpret the term "included in the plan" -- to be referenced, to be cited, or to be actually included, or some other interpretation (please specify).

213-A-6(a) Has any copy of the RAC or FEMA staff evaluation_s of the Harris ERP been served on (i) NRC Staff (ii) NC Emergency Planners (iii) other NC government or county government agencies or personnel (iv) CP&L (v) NCEMPA (vi) Harris licensing proceeding intervenors? (b) Has any copy of the RAC or FEMA staff evaluations been made available to anyone in any of the listed groups in subparts (i) ... (vi) to (a) above? If so, to whom, when and why??? (c) Are you aware of FEMA counsel Perry's statements in the Harris licensing case prehearing conference of May, 1984, regarding availability of the results of these reviews to the parties to that case? (d) Do you believe FEMA is in compliance with such statements? (e) Do you have available to you a copy of the transcript of the Harris OKL case (NRC Docket 50-400) prehearing conference of May 1984 in which FEMA counsel Perry participated or appeared?

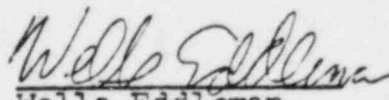
57-c-7(4)(a) Is there an arrangement or typographical error on page 12 of your responses to previous Eddleman/J.I. interrogatories concerning contention 57-C-7? (b) If so, what is the correct answer or answers to 57-c-7-2 and -3??

57-C-7-5(a) Please provide a more complete answer to 57-C-7-3 ("57-C-3") answering parts (i) thru (iv) or specifying to which part(s) your answer applies. (b) What requirements, if any, are you aware of for (i) evaluation (ii) capability (iii) listing, of hospitals with the capability to treat severe radiation exposure injuries, are you aware of under NRC or FEMA guidelines, rules or regulations? Please specify each such rule or regulation or guidance and give a complete answer.

57-C-7-6(a) Please provide a more complete answer to 57-C-7-2, giving answers to each of its parts. (b) Does FEMA have any plans for listing, evaluating, or otherwise inquiring into the capability of hospitals around the Harris plant to treat severe radiation injury per se? (c) If so, please detail all such plans re items inquired about in ~~the~~(b) above. (d) If you have actually done any of the things inquired about in part (b) above, please tell what you have done and all results of it.

57-C-7-~~6~~7(a) Please identify all sources of information you rely on or use in making your answers to the above and all previous interrogatories on 57-C-7.

8 October 1984


Wells Eddleman