

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN MUNICIPAL )  
POWER AGENCY )

(Shearon Harris Nuclear Power Plant, )  
Units 1 & 2) )  
)  
)  
)

Docket Nos. 50-400 OL  
50-401 OL

APPLICANTS' SUPPLEMENTAL ANSWERS TO WELLS EDDLEMAN'S  
INTERROGATORIES ON CONTENTIONS 75 AND 83/84

On June 13, 1983, the undersigned counsel for Applicants and Wells Eddleman conducted negotiations pursuant to the Atomic Safety and Licensing Board's Memorandum and Order (Reflecting Decisions Made Following Second Prehearing Conference), dated March 10, 1983, concerning answers of Applicants to Interrogatories 75 and 83/84. As a result of said negotiations, Applicants have agreed to supplement certain of their answers contained in Applicants' Answers to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 22A, 22B, 75, 80, 83/84 and 132 to Applicants Carolina Power & Light Company et al. (First Set), filed April 28, 1983. Specifically, Applicants herein supplement responses to Interrogatories 75-3, 83/84-1(c), 83/84-1(h), 83/84(j), 83/84-1(k), and 83/84-1(u)(ii):

1. Applicants' answer to Interrogatory 75-3 is hereby supplemented by adding the following:

75-3(a). Applicants utilize no chemical or biochemical means in the main condenser itself to protect it from corrosion in connection with organisms.

75-3(b). The only aluminum bronze alloy used in the condenser is in the tube sheet. Specifically, the material used is Aluminum Bronze ASTM-B171 and is 1.375 inches thick.

75-3(c). The aluminum bronze tube sheet is connected to (1) carbon steel shell and water box walls through a flange connection; and (2) Cu-Ni tubes, integrally grooved in the tube sheet.

The tube sheet is not directly grounded to the station grounding system. It is only grounded through its interconnected carbon steel shell and water box.

75-3(d). The condenser is directly grounded to the station grounding system by (2) 4/0 AWG copper cables. The cables are connected through one-inch by one-quarter inch grounding lugs to the carbon steel shell at two opposite sides.

75-3(e). No. The surrounding environment in the area of the grounding connection is non-corrosive.

75-3(f). Not applicable.

2. Applicants' answer to Interrogatory 83/84(c) is hereby supplemented by adding the following:

Applicants have given no specific consideration to this issue other than in 1) insuring that SHNPP discharges meet permitted discharge restrictions imposed by federal and state law, and 2) responding to Interrogatories on Contention 83/84. Applicants have no specific dates therefore except that responses to Interrogatories on Contention 83/84 were filed April 28, 1983.

3. Applicants' answer to Interrogatory 83/84-1(h) is hereby supplemented by adding the following:

(h)(i). Not applicable.

(h)(ii). Not applicable.

(h)(iii). Not applicable.

4. Applicants' answer to Interrogatory 83/84-1(j) is hereby supplemented by adding the following:

CP&L has not specifically studied organic chemicals in any such study.

(j)(i). No.

(j)(ii). No.

(j)(iii). No.

(j)(iv). No.

(j)(v). No.

5. Applicants' answer to Interrogatory 83/84-1(k) is hereby supplemented by adding the following:

CP&L has not specifically studied metals and their salts in any such study.

(k)(i). No.

(k)(ii). No.

(k)(iii). No.

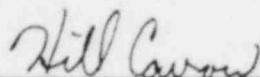
(k)(iv). No.

(k)(v). No.

6. Applicants' answer to Interrogatory 83/84-1(u)(ii) is hereby supplemented by adding the following:

There are no written limits for maximum quantities of each chemical substance not identified in the ER which may be allowed on the SHNPP site.

This 30<sup>th</sup> day of June, 1983.



---

Hill Carrow  
Attorney  
CAROLINA POWER & LIGHT COMPANY  
Post Office Box 1551  
Raleigh, North Carolina 27602  
(919) 836-6839

Attorneys for Applicants:

Thomas A. Baxter  
John H. O'Neill, Jr.  
SHAW, PITTMAN, POTTS & TROWBRIDGE  
1800 M Street, N.W.  
Washington, D. C. 20036

Richard E. Jones  
Samantha Francis Flynn  
CAROLINA POWER & LIGHT COMPANY  
Post Office Box 1551  
Raleigh, North Carolina 27602  
Telephone: (919) 836-6517

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

JUL 5 1983

In the Matter of

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN MUNICIPAL )  
POWER AGENCY )

(Shearon Harris Nuclear Power Plant, )  
Units 1 & 2) )  
)  
)  
)

Docket Nos. 50-400 OL  
50-401 OL

AFFIDAVIT OF WILLIAM T. HOGARTH

COUNTY OF WAKE )

STATE OF NORTH CAROLINA )

William T. Hogarth, being duly sworn according to law, deposes and says that he is Manager - Environmental Technology Section of Carolina Power & Light Company; that the supplemental answers to Interrogatories on Contention 75 and 83/84 contained in "Applicants' Supplemental Answers to Wells Eddleman's Interrogatories on Contentions 75 and 83/84" are true and correct to the best of his information, knowledge and belief; and that the sources of his information are officers, employees, agents and contractors of Carolina Power & Light Company.

William T. Hogarth  
William T. Hogarth

Sworn to and subscribed before  
me this 30<sup>th</sup> day of June, 1983.

William T. Bryson  
Notary Public

My commission expires: August 8, 1987

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



Docket Nos. 50-400 OL  
50-401 OL

Will Carson

Hill Carrow  
Attorney  
CAROLINA POWER & LIGHT COMPANY  
Post Office Box 1551  
Raleigh, North Carolina 27602



### SERVICE LIST

James L. Kelley, Esquire  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Glenn O. Bright  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. James H. Carpenter  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Charles A. Barth, Esquire  
Myron Karman, Esquire  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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

Mr. Daniel F. Read, President  
Chapel Hill Anti-Nuclear  
Group Effort  
Post Office Box 524  
Chapel Hill, North Carolina 27514

Deborah Greenblatt, Esquire  
1634 Crest Road  
Raleigh, North Carolina 27606

Ruthanne G. Miller, Esquire  
Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

John D. Runkle, Esquire  
Conservation Council of North Carolina  
307 Granville Road  
Chapel Hill, North Carolina 27514

M. Travis Payne, Esquire  
Edelstein and Payne  
Post Office Box 12643  
Raleigh, North Carolina 27605

Dr. Richard D. Wilson  
729 Hunter Street  
Apex, North Carolina 27502

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

Thomas A. Baxter, Esquire  
John H. O'Neill, Jr.  
Shaw, Pittman, Potts & Trowbridge  
1800 M Street, N.W.  
Washington, D. C. 20036

Dr. Phyllis Lotchin  
108 Bridle Run  
Chapel Hill, North Carolina 27514

Bradley W. Jones, Esquire  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street  
Atlanta, Georgia 30303

Karen E. Long, Esquire  
Staff Attorney  
Public Staff  
North Carolina Utilities Commission  
Post Office Box 991  
Raleigh, North Carolina 27601