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UNITED STATES OF AMERICA

February 15, 1985

NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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

Dear Administrative Judges,

This letter is to respond to Applicants' Counsel Hollar's letters of 2-8-85 re Contention 57-C-13, and of 2-11-85 re 57-C-3. Concerning 57-C-3, Hollar asserts that "sworn, undisputed expert testimony attests to all the facts necessary for disposition of this contention." But the sworn testimony of Applicants' own expert in Catawba, as enclosed with my response opposing summary disposition of this contention, disputes the assertions in Dr. Bassiouni (Applicants' expert)'s affidavit on 57-C-3. For this reason, the submission of additional data is irrelevant, and FFMA should also consider the defects brought out in that Catawba testimony concerning the effectiveness of siren notification.

Concerning 57-C-13, Hollar correctly states that I am not filing formal opposition on that contention, but he didn't tell you why not. I believe Applicants have attempted to address this contention, but they have not produced numbers for the protection factors of the highest PF areas in the hospitals and nursing homes. They should do that,

and if their survey was done right, can easily do it. PF methodology must give numbers -- the PF is a number. But I see no point in forcing a hearing on something CP&L can do so easily if they are acting in good faith. I simply ask them to do it voluntarily. *W. J. Edelman*

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