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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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USNRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

11-26-85

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

Wells Eddleman's General Interrogatories  
to Applicants Carolina Power & Light et al.

(FP: XSet)

6-14-84 + 8-03-84 11/15/85

Under 10 CFR 2.740, 2.741 and the Board's 9-22-82 Memorandum(s)  
and Order, <sup>(s) + oval ruling of 11/5/85</sup> Wells Eddleman requests Applicants <sup>AND NC Dept of CCLTS + County emergency planners</sup> to answer separately  
and fully in writing, under oath or affirmation, each of the  
following interrogatories, and to produce a permit inspection and  
copying of the original or best copy of all documents identified  
in response to interrogatories as set forth below.

These interrogatories are intended to be continuing in nature,  
and I request each answer to be promptly supplemented or amended as  
appropriate under 10 CFR 2.740(e), should CP&L, NCEMPA, any other  
or any contractor or consultant to any, some or all of those,  
Applicant, or any employee of any or some or all of them, or any  
individual acting on behalf of any or some of all of them, obtain  
or create any new or differing information responsive to these  
(where "Them" refers to the preceding listing(s))  
general interrogatories. The request for production of documents  
is also continuing and requests Applicants <sup>AND all others mentioned above</sup> to produce promptly if  
not immediately any additional documents the Applicants and others  
acting on their behalf or employed by them, as listed in the previous

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sentence, obtain which are responsive to the request(s) for production of documents below.

Where identification of a document is requested, please briefly describe the document (e.g. book, notebook, letter, memo, report, notes, transcript, minutes, test data, log, etc.) and provide the following information as applicable: document name, title, number, author(s), date of writing or of publication or both, addressee, date approved, by whom approved, and the name and address of the persons having normal custody of the document, and name and address of any person other than the preceding having actual possession of the document. When identifying documents in response to these interrogatories and requests, please state the portion or portions of the document (e.g. sections, chapters, pages, lines) upon which Applicants rely or which Applicants swear or affirm is/are responsive to the applicable interrogatory or request.

DEFINITIONS herein:

"Harris", "Harris Plant", "SHNPP", or "plant" where not specified otherwise, all mean the Shearon Harris Nuclear Power Plant.

"Applicants" means all of the persons, employees, consultants, contractors and corporations as listed in the first sentence of the second paragraph on page 1 of this document, above.

"FSAR" means the Harris Final Safety Analysis Report.

"ER" means the Harris Environmental Report.

"Document(s)" means all writings and records of every type, including electronic and computer records, in the possession, control or custody of Applicants or any individual(s) acting on Applicants' behalf, including, but not limited to: reports, books, memoranda, correspondence, notes, minutes, pamphlets, leaflets, magazines, articles, surveys, maps, bulletins, photographs, speeches, transcripts,

voice recordings, computer printouts, information stored in computers or computer peripheral devices such as disks, drums, etc., voice recordings, microfilm, microfiche and all other writings or recordings of any kind(s); and copies of any of the preceding even though the original(s) are not in the possession of Applicants or in their custody or control. Document(s) shall be deemed to be within the control of Applicants or <sup>any</sup> individual(s) acting on their behalf if they have ownership, possession, or custody of the document(s) or a copy thereof, or have the right to secure the document(s) or a copy thereof, from any person or public or private entity having physical possession thereof.

Each definition given above applies within all other definitions above.

### GENERAL INTERROGATORIES

G1 (a) Which contentions of Wells Eddleman do Applicants agree are now admitted in this proceeding, NPC Dockets 50-400/401 O.L.?

(b) for each such contention, provide for any answers to interrogatories by Wells Eddleman which Applicants have previously or presently received (except those suspended by Board order, if any), the following information:

(c) Please state the name, present or last known address, and present or last known employer of each person whom Applicants believe or know (1) has first-hand knowledge of the facts alleged in each such answer; or (2) upon whom Applicants relied (other than their attorneys) in making such answer.

(d) please identify all facts concerning which each such person identified in response to G1(c)(1) above has first-hand knowledge.

(e) please identify all facts and/or documents upon which each person identified in response to G1(c)(2) above relied in providing information to respond to the interrogatory, including the parts of such documents relied upon.

(f) Please identify any other document(s) used <sup>or relied upon</sup> by Applicants in responding to the interrogatory.

(g) Please state which specific fact each document, identified in response to G1(e) and G1(f) above, supports, in the opinion or belief of Applicants, or which Applicants allege such document supports.

(h) Please state specifically what information each person identified in response to G1(c)(1) or G1(c)(2) above provided to or for Applicants' affiant in answering the interrogatory. If any of this information is not documented, please identify it as "undocumented" in responding to this section of General Interrogatory G1.

G2.(a) Please state the name, present or last known address, title (if any), and present or last known employer, and economic interest (shareholder, bondholder, contractor, employee, etc.) if any (beyond expert <sup>or other</sup> witness fees) such person holds in Applicants or any of them, for each person you intend <sup>or expect</sup> to call as an expert witness or a witness in this proceeding, if such information has not previously been supplied, or has changed since such information was last supplied, to Wells Fiddleman. This applies to Fiddleman and Joint Contentions as admitted, or stipulated by Applicants.

(b). Please identify each contention regarding which each such person is expected to testify.

(c) Please state when you first contacted each such person with regard to the possibility of such person's testifying for Applicants, if you have contacted such person.

(d) Please state the subject matter, separately for each contention as to which each such person is expected to testify, which each such person is expected to testify to.

(e) Please identify all documents or parts thereof upon which each such witness is expected to, plans to, or will rely, in testifying or in preparing testimony.



G3(a) Please identify any other source(s) of information which Applicants have used to respond to any interrogatory identified under G1 above, stating for each such source the interrogatory to which it relates, and what information it provides, and identifying where in such source that information is to be found.

(b) Please identify any other source(s) of information not previously identified upon which any witness identified under G2 above, or other witness, has used in preparing testimony<sup>or exhibits</sup>, or expects to use in testimony or exhibits, identifying for each such source the witness who is expected to use it, and the part or part(s) of such source (if applicable) which are expected to be used, and, if not previously stated, the fact(s) or subject matter<sup>(or both)</sup> to which such source relates.

G4(a) please identify all documents, <sup>and which</sup> pages or sections thereof Applicants intend or expect to use in cross-examination of any witness I call in this hearing. For each such witness, please provide on a timely basis (ASAP near or during hearings) a list of all such documents, the subject matter Applicants believe they relate to, and make the document(s) available for inspection and copying as soon as possible after Applicants decide or <sup>form intent</sup> ~~intend~~ to use such document in cross-examination.

(b) please identify any undocumented information Applicants intend to use in cross-examination of each such witness for me.

G5 (a) for each contention Applicants state or admit is an admitted Eddleman contention under G1(a) above, or an admitted joint intervenor contention, please state whether Applicants have available to them experts, and information, on the subject matter of the contention.

(b) If the answer to (a) above is other than affirmative, state whether Applicants expect to be able to obtain expertise in the subject matter, and information on it, and if not, why not.

G-6(a) for each document identified in response to any interrogatory herein, or referenced in response to any interrogatory herein, please supply all the following information which has not already been supplied:

- (i) date of the document
  - (ii) title or identification of document
  - (iii) all authors of the document, or the author
  - (iv) all qualifications (professional, technical) of each author of the document
  - (v) the specific parts, sections or pages, if any, upon which Applicants rely of the document,
  - (vi) the specific information each part, section or page identified in response to (v) above contains.
  - (vii) identify all documents used in preparing the document, to the extent known (and also to the extent not identified in the document itself)
  - (viii) state whether Applicants <sup>or State of NC or any emergency planner</sup> possess a copy of the document
  - (ix) state all expert opinions contained in the document, upon which Applicants rely, or identify each such opinion.
  - (x) identify the contention(s) with respect to which Applicants rely upon (a) the expert opinions (b) the facts identified in the document
  - (xi) state whether Applicants now employ any author(s) of the document, identifying each such person for each document.
  - (xii) state whether Applicants have ever employed any author(s) of the document, identifying each such person for each document.
  - (xiii) identify all sources of data used in the document.
- Answers to all the above may be tabulated or grouped for efficiency.

G-7(a) Please identify all documents which Applicants plan, expect or intend to offer as exhibits (other than for cross-examination) with respect to each Eddleman contention admitted in this proceeding which (i) is included in your current response to G1(a), or (ii) is the subject of interrogatories in this set; please state for which contention or contentions each exhibit will be or is expected to be offered.

(b) Please identify all documents which Applicants plan, expect or intend to use in cross-examination of any other parties' witnesses or joint intervenor witness in this proceeding, with respect to (i) Eddleman contentions identified under G-7(a)(i) (or G1-(a)) above, or any other Eddleman contention which is the subject of interrogatories in this set; (ii) each Joint contention now admitted in this proceeding; (iii) per our agreement of 4-8-83, each contention of each other party to this proceeding which is currently admitted. Please identify for each such document the witnesses, or witness, and all contentions with respect to whom (or which) that document is planned, expected, or intended to be offered or used.

(c) Please identify which of the documents identified in response to (b) above will be offered into evidence by Applicants, and (i) which of the same documents Applicants expect to offer into evidence or intend to offer as evidence or exhibits in this proceeding.

*and/or specific interrogatories below*  
G-10(a) Where the above general interrogatories, or any of them, call for identification of documents, (i) and no documents are identified, is that the same as Applicants stating that there are no documents responsive to this general interrogatory, in each case where no documents are identified? (ii) and documents are identified, is that the same as Applicants stating that the identified

documents are the only ones presently known which are responsive to the interrogatories? (iii) If your answer to G-10(a)(ii) is other than affirmative, please state all reasons for your answer. (iv) If your answer to G-10(a)(i) above is other than affirmative, please state all reasons for your answer.

(b) Where any interrogatory, general or specific, herein, calls for factual information (i) and an opinion is stated in response, is that the expert opinion of any person(s) identified as having contributed information to that response? (ii) and facts are given or identified (or a fact is) in response, but no documents are identified, does that mean Applicants have no documents containing such fact(s)?

(iii) If your answer to (i) above is affirmative, please state for each such response all qualifications of <sup>each</sup> expert upon whom Applicants rely for each such answer. The qualifications need be stated only once for each such person if they are clearly referenced in other answers. (iv) If your answer to (i) above is other than affirmative, please state which opinions, if any, given in response to interrogatories (general or specific) herein is the opinion of an expert, identify each expert whose opinion you used in response to each interrogatory, and state in full the qualifications of each such expert. (v) If your answer to (i) above is other than affirmative, please identify all opinions of non-experts used in your responses, and identify each non-expert whose opinion is included in each answer herein.

(vi) If your response to (ii) above is other than affirmative, please identify each document which contains a fact not previously documented in your response(s), stating what the fact is, and at what page, place, chapter or other specific part the document contains such fact.



G-11 For each answer to each interrogatory herein (or any subpart or part thereof), please identify each item of information in possession of Applicants (including facts, opinions of experts, and documents) which (a) contradicts the answer you made, (i) in whole (ii) in part (please identify each such part for each item of information identified); (b) casts doubt on your answer (i) in whole (ii) in part (please identify each such part for each item of information identified). (c) Please identify all documents not already identified in response to parts (a) and (b) above (and their subparts) which contains any item of information asked for in (a) or (b) above. Please identify for each such document what information item(s) it contains and what answer(s) each such item is related to.

G-12(a) In your previous <sup>Present</sup> answers where you have not identified documents, (i) have all relevant documents been produced in lieu of stating identification of each such document? (ii) do you rely on the entire document, since you have not identified parts or page numbers? (iii) if there are any particular parts or pages of each document produced, which you believe are responsive to an interrogatory or portion thereof, please identify each set of parts or pages in each document, together with the interrogatory or portion thereof (or interrogatories and/or portions thereof) to which it is responsive. (iv) where no documents are identified and identification of documents has been requested, are you saying such no documents exist? Or that no such documents are in your possession? (b) In your present answers, are you actually identifying documents where identification of documents is requested? (c) If not, how are you going to provide identification of documents? Will that identification include statements of relevant pages or parts?

G-13 Is there any merit or information or ~~opinion~~ opinion supporting

(a) all (b) any part(s) of Contentions referenced in these interrogatories?

(c) If your answer(s) to (a) or (b) are in any way affirmative, please identify all such part(s), merit, information or opinion and identify all documents containing information or opinion which would support such contention(s) or part(s), and explain all such merit(s).

(d) If your answers to (a) or (b) above are in any way negative, please <sup>for those answers,</sup> give all reasons, and identify all documents containing information relied on in making those answers. (e) Please state, and identify all documents containing any information relied upon or used by you in answering, all reasons not previously identified for your answers to G-1 thru 12, and to all parts of G-13 above.

G-EPX. Please answer all of Applicants' and Staff's interrogatories to me on EPX-2 and EPX-8, including general interrogatories, as if the same questions had been asked to you as if <sup>fully</sup> ~~if possible~~ set out here. Please answer as if the term "your contention" means "Contention EPX-2 and/or Contention EPX-8" in each such question or interrogatory, and that "your contentions" also means "Contention EPX-2 or EPX-8 or both".

#### Non-General Interrogatories

EPX-2-1. Please identify all documents related to each and every communications deficiency referred to or described in any way in <sup>includes</sup> Contention EPX-2. This <sup>includes</sup> ~~includes~~ evaluators' <sup>and others'</sup> handwritten notes, typewritten notes, tape recorded notes, all documents concerning the admission of contention EPX-2, all documents concerning actions recommended to be taken to deal with the deficiencies mentioned or referred to in EPX-2, actions that might be taken with respect to any matters referred to in EPX-2, responses to contention EPX-2, and records or information relating to any matter mentioned in Contention EPX-2.

EPX-2-2(a) Please describe, and identify all documents relating to, all "lack(s) of effective communications" during the emergency planning exercise. (This refers, here and below, to the exercises held May 17-18, 1985, re the Shearon Harris Nuclear Power Plant)

(b) Please describe, and identify all documents relating to, all "lack of radiation monitoring results" during the emergency planning exercise.

(c) Please describe, and identify all documents relating to, "lack of contact with field and ground units" during the emergency planning exercise.

(d) Please describe, and identify all documents relating to, the overloading of the emergency inter-system mutual aid frequency during the emergency planning exercise, including (i) the bandwidth of such frequency, (ii) the frequency or frequencies in Hertz (cycles/second) (iii) the capacity of such frequency or frequencies in number of simultaneous voice channels (iv) the number of unit(s) having access to such frequency (v) the number of units not involved in the emergency planning exercise having access to use of such frequency or frequencies (vi) the maximum number of units or callers trying to use such frequency at the same time (vii) the nature and extent of any misuse of such frequency or frequencies during the exercise or at other times. Please identify all documents relating to any of the above matters.

(e) Please describe, and identify all documents relating to, the communication inadequacies of the NC Highway Patrol, particularly those related to insufficient equipment, ability to adequately handle the number of units responding to an emergency of the (nuclear plant) type, during the exercise or otherwise; the number of units of the Highway Patrol that did respond to the Harris emergency planning exercise, and the number of frequencies available to those units and their base stations, relay stations, etc, and the capacity of each frequency for handling communications, in the form of 2-way conversations in voice, or other capability for communication.

Please identify all documents giving information asked for above, or relating to any such information.

(f) Please describe, and identify all documents relating to, the number of telephones available to the Harnett County emergency personnel during the exercise, what a "sufficient" number of telephones for them would be, or is; and any insufficiencies of the telephones available to Harnett County emergency response personnel during the exercise. Please identify all documents giving such information or relating to any of the above matters.

(g) Please describe, and identify all documents relating to, the amount of radio traffic in Chatham County during the exercise, the number of radio operators on duty in Chatham County at all times during the exercise, the capacity of such operators/dispatchers to handle radio traffic, the amount of radio traffic that was "extra" during the exercise in Chatham County, and the overloading of personnel on duty in Chatham County due to extra radio traffic, the degree of such overloading, what personnel were overloaded, when, and for how long. Please identify all documents containing any of the information inquired about above, or relating to any part(s) of such information, no matter how small a part or part(s).

(h) Please describe, and identify all documents relating to, delays in Emergency Medical Services Office receiving messages from SERT (State Emergency Response Team). Please identify and provide a copy of all messages that were delayed, and give the amount of time each was delayed and the content of each such message. Please identify all documents containing any of the above-requested information, or relating to it.

(I) Please describe, and identify all documents relating to, communications paths from the mobile radiation lab to base station(s)



that involved any relay or relay(s). Please identify each such communication, its date, time, and contents and all documents relating to it; please also identify the specific relay(s) that were used, by unit, location, relay method, frequencies employed, communications method employed, time involved in relaying, and content of message as relayed as well as content of message sent to be relayed. Please identify all documents or recordings of such messages, and all documents containing any of the information inquired about above, or relating to it.

(j) Please describe the "possibility of delayed and/or incorrect information" in relaying reports from the mobile radiation lab to base and all documents related to this matter and the state Radiation Protection Section evaluator's information about it, opinions about it, and statements about it, including any communications to or from the evaluator concerning this opinion, or the evaluator's evaluation or statements concerning the possibility of delayed or incorrect information (or both) resulting from relays of information. Please also identify all documents relating to any of the above matters.

(k) Please identify all documents sent to or from (i) evaluators (ii) other emergency planning personnel (iii) FEMA staff (iv) NRC Staff (v) Applicants or persons working for or with them (vi) other government officials, concerning the matters mentioned or referred to in the above interrogatories and parts and subparts, or concerning any matters related to contention EPX-2 or matters mentioned or referred to in it. Please note especially here that this interrogatory is a continuing one.

EPX-2-3(A) With respect to every matter inquired about in any part of Interrogatory EPX-2-2 above, please provide the following information and identify all documents relating thereto:

(i) what action(s) have been suggested, thought of, written down, recommended, considered or discussed concerning actions which might or should be taken to remedy any communications deficiency identified or alleged with regard to this matter. (Please provide an answer to this part separately for each matter identified in response to any part(s) of Interrogatory EPX-2-2(a) through (k) above, and for any matter inquired about in any of these parts. )

(ii) what actions have been taken to remedy any of the communication deficiencies alleged in Contention EPX-2? Please identify for each the action, who takes it, the schedule for its completion, any tests of the adequacy of the remedy or action, the results and any evaluations of such tests, any other evaluations positive, negative or otherwise of the adequacy of the remedy or action, what equipment changes are involved in the action, the specific equipment (item, make, model, function) involved, the degree to which the action or remedy does in fact solve the communications problem, and please identify all documents relating to the above, particularly recommendations for action, authorizations for action, evaluation or remedies, statements concerning completion of action, etc.

(iii) What actions were recommended or discussed or thought of, but not taken, to remedy each deficiency alleged in EPX-2 or inquired about in any part(s) of Interrogatory EPX-2-2 above? Please describe every such action, and all reasons why each was not taken, and identify all documents relating to such action, <sup>and/or to</sup> the decision not to take it, reasons why it was not taken, and other matters relevant to the decision.

(iv) What actions are still under consideration for remedying any communications deficiencies alleged in EPX-2 or inquired about in EPX-2-2 above or any part of EPX-2-2? Please identify each such action, all documents relating to it, all reasons why it is still under consideration and when or if it is to be implemented.

(v) What actions are yet to be completed to remedy any communications deficiencies alleged in Contention EPX-2 or inquired about in any part(s) of Interrogatory EPX-2-2 above? Please identify each such action and all documents relating to it, to why it is to be done, why it was recommended and by whom, why it has not been completed yet, when it is scheduled to be completed, who is in charge of completing it, what their authority and powers to complete it are, and when any portion(s) of it are to be completed. Please identify all documents containing any information inquired about above, or information or opinions relating to any such matters.

(vi) What barriers, financial, organizational, bureaucratic, or otherwise, exist to the completion in a 100% successful manner of any remedy or remedies (or actions to remedy) any communications deficiency or deficiencies alleged in Contention EPX-2 or inquired about in any part(s) of Interrogatory EPX-2-2 above? Please identify and describe in detail each such barrier and what will be required to overcome it, telling whether it will be overcome, and if so, when, and with what resources and actions, and on what schedule any or all of those actions are being taken, and when and how any or all of those resources will be available. For each barrier or impediment to any remedy for the communications deficiencies inquired about above, please give a specific description of the problem(s) the barrier or impediment causes, and the specific personnel, material resources, financial resources, and other resources to be used to overcome each impediment or barrier. Please give a schedule for the overcoming of each such barrier or impediment and identify all barriers or impediments that have not yet been overcome. Please identify all documents relating to any impediment or barrier to implementing 100% effective remedies for every communications deficiency mentioned or referred to in Contention

EPX-2 or inquired about in any part(s) of Interrogatory EPX-2-2 above. Please identify all documents containing any other information inquired about above, most particularly including the nature of the barriers or impediments, the resources to be used to overcome them, the schedule(s) for overcoming them, and which impediments or barriers have not been overcome.

(vii) Please identify any other problem or circumstance that <sup>(vii-a)</sup> could, <sup>(vii-b)</sup> or would, interfere with achieving 100% remedying of all communications deficiencies mentioned or alleged in Contention EPX-2 or inquired about in Interrogatory EPX-2-2 above. Please identify all documents relating to each such problem or circumstance and any schedule for or means for dealing with or overcoming such problem or circumstance. Please identify any documents containing information about problems or circumstances which (vii-c) may, or (vii-d) will, not be overcome, and which can or do interfere with achieving 100% effective remedies for every communications deficiency mentioned or alleged in Contention EPX-2 or inquired about in Interrogatory EPX-2-2 above.

(b) Please provide the identification of all documents containing any other information available to you that relates to remedying communications deficiencies, particularly those alleged or mentioned in Contention EPX-2 or inquired about in any part(s) of Interrogatory EPX-2-2 above.



EPX-8-1. Please identify all documents related to each and every inadequacy, incomplete use, problems with activation, inadequate coverage, or ineffective management of the Emergency Broadcast System (EBS), including incomplete messages and/or incomplete instructions to the public, inadequate procedures for activation and use of the EBS before the State assumes control, inadequate coverage of the emergency area and/or the emergency response area, incomplete messages and incomplete instructions to the public, and other problems with EBS activation (e.g. those mentioned on pages 17-18 of FEMA's draft reports on the emergency planning exercise at Shearon Harris.) This includes sound tapes, video tapes, actual content of messages used during the exercise, transcripts of messages used (I don't want the authentication codes, just the messages themselves), reviewers' handwritten or other notes, note of persons observing the exercise or participating in it, logs of EBS stations as to what messages were sent and when, drafts of the FEMA report(s) on the exercise, and any other document(s) or records relating to these matters, whatsoever.

EPX-8-2(a) Please describe, and identify all documents relating to, ineffective management of the EBS during the exercise.

(b) Please describe, and identify all documents relating to, EBS activation inadequacies during the exercise.

(c) Please describe in what ways and by what omissions messages to the public were incomplete during the exercise. Please identify all documents relating to such incompletenesses, for each message.

(d) Please describe, and identify all documents relating to, incomplete instructions to the public during the exercise, identifying each incomplete instruction in each message, and telling what information would be required or is required to complete the instruction in each case. Please identify all documents relating to any such incompleteness or incompletenesses, for one message or all messages or any combination of messages during the exercise.

(e) Please describe, and identify all documents relating to, any problems with EBS activation during the exercise. Please identify each such problem and separately identify all documents relating to it.

(f) Please describe, and identify all documents relating to, inadequate coverage of the emergency area during the exercise. Please state what is adequate coverage of the emergency area according to (i) applicable rules or standards (ii) your opinion, if different. Please identify all documents relating to your opinion or adequate rules or standards for adequate coverage of the emergency area.

(g) Please describe, and identify all documents relating to, inadequate coverage of the emergency response area during the exercise. Please also state what is adequate coverage of the emergency response area by the EBS (i) according to applicable rules or standards (ii) in your opinion. Please identify all documents relating to your opinion or to adequate rules or standards for adequate coverage of the emergency response area.

(h) Please identify all other respects in which the use of the emergency broadcast system (EBS) was incomplete during the exercise. Please identify all documents relating to each such respect in which use of the EBS was incomplete.

(I) Please identify all other aspects of EBS use which were incomplete or ineffectively managed or had problems during the exercise. Please identify all documents relating to each such problem.

(J) Please describe and identify all documents relating to standards which the EBS must meet.

EPX-8-3(a) Please identify every step or measure being taken to remedy each of the problems, inadequacies, deficiencies or other defects of EBS use at Shearon Harris described, mentioned or identified in Contention EPX-8 or asked about in any part(s) of interrogatory EPX-8-2 above.

(b) Please identify all barriers, impediments or problems with ~~x~~ each step or measure being taken to remedy each problem, inadequacy, deficiency or other defect in (Harris) EBS use that (i) could (ii) would prevent such step or measure from being 100% effective.

(c) Please state which measures or steps to remedy any problem, inadequacy, deficiency or other defect in (Harris) EBS use have been (i) thought of (ii) written down (iii) proposed (iv) accepted (v) rejected (vi) considered (vii) completed (viii) scheduled to be completed, please tell when each is to be completed (ix) kept under consideration at present. Please note that this is a continuing interrogatory, as are all of these.

(d) Please give all reasons why each step or measure asked about in (c) above was (i) accepted (ii) rejected (iii) kept under consideration (iv) not considered.

(e) Please identify all documents relating to any of the information or matters ~~inquired~~ inquired about above, especially those proposing ~~xxx~~ measures or steps to remedy deficiencies, defects, problems or inadequacies with the EBS, evaluating such measures or steps, deciding which to implement, scheduling implementation, evaluating the completed measures or steps for effectiveness, or rejecting or declining to consider any measures or steps.

(f) Can the remedial measures and steps so far completed assure with 100% ~~x~~ confidence that all defects, deficiencies, inadequacies and/or problems alleged in Contention EPX-8, mentioned in Contention EPX-8, or inquired about in any part(s) of Interrogatory EPX-8-2 above, will not occur ~~xxxx~~ if the EBS must be activated in a real nuclear emergency at Shearon Harris? Please provide all reasons for your answer and identify all documents you use or rely on in making your answer, all opinions you use or rely on in your answer (and whose they are),

and all other information or things you used or relied on in making your answer. Please identify all documents containing any of this information or opinion, and please also identify any documents containing information or opinions contrary to those you used or relied on, or information or opinions that would undermine or contradict your answer in whole or in part.

(g) Please provide all other information relating to EPX-8.

REQUEST FOR PRODUCTION OF DOCUMENTS

Wells Eddleman hereby requests that Applicants, and NRC and FEMA Staff, make available the original or best copy of each and every document (including tapes and other recordings, e.g. videotapes) identified in response to the above interrogatories, for inspection and copying and a mutually agreeable time and place.

This is the 26th of November, 1985

  
Wells Eddleman

N.B. I received a one-day extension to file this set of interrogatories, approved by counsel for Applicants and for NRC Staff (Dale Hollar, and Charles Barth, respectively.)



② of 3

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.  
Shearon Harris Nuclear Power Plant, Unit 1

Docket 50-400  
O.L.

'85 NOV 29  
CERTIFICATE OF SERVICE

I hereby certify that copies of Wells Eddleman's Interrogatories  
to Applicants, and WE Interrogatories to NRC/FEMA Staff, on EPX-2 and EPX-8  
and W.E. Letter on 57-C-3 Exhibit numbers,  
HAVE been served this 26 day of November 1985, by deposit in

the US Mail, first-class postage prepaid, upon all parties whose  
names are listed below, except those whose names are marked with  
an asterisk, for whom service was accomplished by express mail

single copy of interros's to Board, per oral order

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)  
Atomic Safety and Licensing Board  
US Nuclear Regulatory Commission  
Washington DC 20555

\*Dale Hollar, Legal DEpt.  
CP&L, Box 1551  
Raleigh, NC 27602

George F. Trowbridge (attorney for Applicants)  
Shaw, Pittman, Potts & Trowbridge  
1800 M St. NW  
Washington, DC 20036

Ruthanne G. Miller  
ASLB Panel  
USNRC Washington DC 20555

Office of the Executive Legal Director  
Attn Dockets 50-400/401 O.L.  
USNRC  
Washington DC 20555

E 1 Spence W. Perry D.  
P.L. FEMA Room 840  
Only 500 C St. SW  
Washington DC 20740

Docketing and Service Section (3x)  
Attn Dockets 50-400/401 O.L.  
Office of the Secretary  
USNRC  
Washington DC 20555

Dan Read  
CHANGE/FLP  
5707 Waycross  
Raleigh, NC 27606

John Runkle  
CCNC  
307 Granville Rd  
Chapel Hill NC 27514

(E Plan only)  
Steve Rochlis  
FEMA - Suite 700  
1371 Peachtree St NE  
Atlanta, GA 30309

Dr. Linda W. Little  
Governor's Waste Mgt. Bd.  
513 Albemarle Bldg.  
325 N. Salisbury St.  
Raleigh, NC 27611

Travis Payne  
Edelstein & Payne  
Box 12607  
Raleigh NC 27605

Robert Gruber  
Exec. Director  
Public Staff  
Box 991  
Raleigh NC 27602

Bradley W. Jones  
USNRC Region II  
101 Marietta St.  
Atlanta GA 30303

Richard Wilson, M.D.  
729 Hunter St.  
Apex NC 27502

Certified by W.E. Eddleman

Al Cole  
Attorney General's Office  
Box 629  
Raleigh, NC 27602