

50-400 OL

App/ Ex. 45

A-45
10/3/85

September 6, 1985

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)

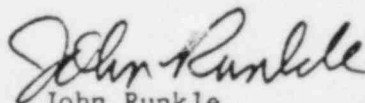
Docket No. 50-400 OL

(Shearon Harris Nuclear Power Plant))

CONSERVATION COUNCIL'S SUPPLEMENT TO DISCOVERY REQUESTS

Pursuant to 10 CFR 2.740(e), now comes the Conservation Council with a supplement to our answers to interrogatories and discovery requests propounded by the Applicants and the Staff on Contention WB-3 (Drug Abuse During Construction). The affidavit by Ms. Miriello which is attached to our Response to Applicants' Motion for Summary Disposition is new information which was not available to us when we answered the other parties discovery requests on May 24 (Applicants) and May 29 (Staff). Ms. Murrell contacted us this past weekend and we became aware of the details which have been placed in the affidavit only in the past two days. The information contained in the affidavit will supplement our responses to Staff interrogatories 70 through 72 (from their April 24 discovery request) in that alleged drug abusers working on safety-related systems are identified. The information also will supplement our response to Applicants interrogatories 19, 23, and 24 (from their May 1 discovery request).

Respectfully submitted,



John Runkle
Counsel for Conservation Counsel