

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-400 OL
50-401 OL

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PDR ADDCK 05C00400
G PDR

Interrogatory 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 fully 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."

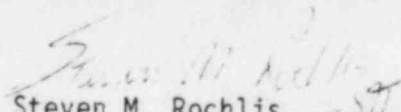
Response

The Federal Emergency Management Agency objects to the above interrogatories in that the interrogatories were not formulated by Intervenor Eddleman, but were formulated by the Applicants. The Applicants did not submit interrogatories to the Federal Emergency Management Agency to answer, nor has Mr. Eddleman demonstrated that the answers to Applicants' Interrogatories are necessary to a proper decision in the proceeding and/or are not reasonably obtainable from another source as required by 10 C.F.R. § 2.720(h)(2)(ii).

MOTION FOR A PROTECTIVE ORDER

On the basis of the above stated objections, and for good cause shown, FEMA respectfully requests the Licensing Board to issue a protective order pursuant to 10 C.F.R. § 2.740(c) that discovery on Intervenor Wells Eddleman Interrogatories 11 and G-EPX to which FEMA has objected, not be had.

Respectfully submitted,


Steven M. Rochlis
Regional Counsel
Federal Emergency Management Agency

Dated at Bethesda, Maryland
this 16th day of January, 1986

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

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

Docket Nos. 50-400 OL
50-401 OL

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "FEMA STAFF RESPONSE TO INTERROGATORIES PROPOUNDED BY INTERVENOR WELLS EDDLEMAN (8th SET)" and "FEMA OBJECTIONS TO INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY INTERVENOR WELLS EDDLEMAN (8th SET) AND MOTION FOR A PROTECTIVE ORDER" in the above-captioned proceeding have been served on the following by deposit in the United States mail first class, or (*) through deposit in the Nuclear Regulatory Commission's internal mail system, or (**) by express mail or overnight delivery, or (***) by hand delivery, this 16th day of January, 1986:

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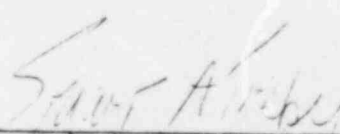
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