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OFFICE OF SECRETARY
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July 6, 1994

Charles Barth, Esq.
Office of the General Counsel
One White Flint North
Stop 15B18
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: In the Matter of Georgia Power Company,
et.al. (Vogtle Electric Generating Plant,
Units 1 and 2) Dockets Nos. 50-424-OLA-3 & 50-
425-OLA-3, SLBP No. 93-671-01-OLA-3

Dear Charles:

I am writing to you with regard to the attached Notice of Depositions of NRC Personnel. As you are aware, Intervenor objects to the Staff's taking an extended amount of time to respond to Intervenor's request for admissions and interrogatories, both of which are dated May 17, 1994. Once the Staff files its responses on Intervenor, Intervenor will need time to go over the information they provide. Therefore, Intervenor request that he be allowed to depose the members of the Vogtle Coordinating Group fourteen (14) days after receipt of the Staff's responses to the request for admissions and the interrogatories, which ever comes later. Please let me know as soon as possible if you are able to consent to this request.

Thank you in advance for you cooperation in this matter.

Sincerely,

Mary Jane Wilmoth
Mary Jane Wilmoth

cc: Service List
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

'94 JUL -8 P5:34

In the Matter of)

GEORGIA POWER COMPANY)
et al.,)

(Vogtle Electric Generating)
Plant, Unit 1 and Unit 2))

Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(transfer to Southern Nuclear)

ASLBP No. 93-671-01-OLA-3

OFFICE OF SECRETARY
DOCKETING & SERVICE
WASHINGTON, D.C.

INTERVENOR'S NOTICE OF DEPOSITION OF NRC PERSONNEL

Intervenor, pursuant to 10 C.F.R. § 1.720(h)(2)(i), hereby request that the Executive Director of Operations of the NRC make available for depositions by oral examination a NRC Representative(s) who has the ability and knowledge to answer questions regarding every fact, finding, and conclusion of the Vogtle Coordinating Group's Analysis, as well as, every member of the Vogtle Coordinating Group, in both their official and individual capacities, within fourteen (14) days after Intervenor receives NRC Staff's responses to Intervenor's request for admissions dated May 17, 1994 and/or Intervenor's interrogatories and request for documents also dated May 17, 1994, whichever comes later. Also, Intervenor request that the Custodian of Records for the NRC produce the documents requested below on August 4, 1994 at 9 a.m. at the offices of Kohn, Kohn and Colapinto, 517 Florida Ave., N.W., Washington, D.C.,.

The witnesses are requested to bring with him/her all materials in his/her immediate control or possession (or in the

immediate control or possession of the agency) which are within the scope of the document~ requested below:

- 1) All documents created by, given to, and/or reviewed by the Vogtle Coordinating Group, including personal notes relating directly or indirectly to any of the issues regarding the Vogtle Coordinating Group analysis and its creation.
- 2) Any document reviewed by the witness in anticipation of testifying in this deposition;
- 3) All "documents" including any written, recorded or graphic matter, however produced or reproduced, of every kind and regardless of where located, including but not limited to any summary, schedule, memorandum, note, statement, letter, telegram, interoffice communication, report, diary, desk or pocket calendar or notebook, daybook, appointment book, pamphlet, periodical, work sheet, cost sheet, list, graph, chart, index, tape, record, partial or complete report of telephone or oral conversation, compilation, tape recordings made by Intervenor, tabulation, study, analysis, transcript, minutes, and all other memorials of any conversations, meetings, and conferences by telephone or otherwise, and any other writing or recording which is in the possession, custody or control of the any and/or all members of the Vogtle Coordinating Group or any employees, representatives, attorneys, investigators, or others acting on behalf of the agency in regard to the Vogtle Coordinating Group Analysis.

This deposition shall continue until the witness has fully testified to the matters pertaining to the Vogtle Coordinating Group's Analysis; with respect to the documents produced by

the witness; and with respect to all matters generally discoverable as background material and relevant to said the contention that Georgia Power lacks character and competence.

Respectfully submitted,

Mary Jane Wilmoth
Mary Jane Wilmoth
Kohn, Kohn & Colapinto, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

Dated: July 5, 1994

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NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)

GEORGIA POWER COMPANY)
et al.)

(Vogtle Electric Generating)
Plant, Unit 1 and Unit 2))

Docket Nos. 50-42480-3 OF SECRETARY
50-42500-3 LING & SERVICE
BRANCH

Re: License Amendment
(transfer to Southern Nuclear)

ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Notice of Deposition of NRC Personnel has been served this 6th day of July, 1994, by first class mail upon the persons listed in the attached Service List, *with the exception that it was hand delivered to the Office of General Counsel.

By:

Mary Jane Wilmoth
Mary Jane Wilmoth, Esq.
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4563

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
GEORGIA POWER COMPANY)	Docket Nos. 50-424-OLA-3
<u>et al.</u> ,)	50-425-CLA-3
(Vogtle Electric Generating)	Re: License Amendment
Plant, Unit 1 and Unit 2))	(transfer to Southern Nuclear)
)	ASLBP No. 93-671-01-OLA-3

SERVICE LIST

Administrative Judge
Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
James H. Carpenter
933 Green Point Drive
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Sunset Beach, NC 28468

Administrative Judge
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U.S. Nuclear Regulatory Commission
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Office of the Secretary
Attn: Docketing and Service
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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