

15482

RELATED CORRESPONDENCE

DOCKETED
July 27, 1994UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD28 (KC)
94 JUL 29 P3:54

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-3Re: License Amendment
(transfer to Southern Nuclear)

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

OFFICE OF SECRETARY
DOCKETING & SERVICE

NOTICE OF DEPOSITION

Intervenor, pursuant to 10 C.F.R. §2.740a(a), hereby provides notice that counsel for Intervenor will take the deposition upon oral examination of the following individuals: Allen Franklin, Ed Crosby, John Meier, a representative(s) of Licensee who can respond to all questions related to licensee verification of dewpoint readings of Plant Vogtle Diesel Generators between 1989 and 1991, and the chairman or acting chairman, as of July 27, 1994, of the Plant Vogtle PRB. Depositions are to commence during the week of August 8, 1994, at a mutually agreeable time and place.

Each and every of the above identified witnesses are directed to bring to their deposition documents that are or anytime were in their immediate control or possession (or in the immediate control or possession of their employer or legal counsel to GPC or other counsel retained to represent any individual in the instant matter) which pertain or relate to the following:

- (1) all information directly or indirectly relating to the

9408040087 940728
PDR ADOCK 05000424
PDR

DSO3

dewpoint readings of the diesel generators between 1989 and 1991.

(2) all information directly or indirectly relating to the reliability of the Plant Vogtle diesel generators or the air quality of said diesel generators;

(3) all personally notes, log books, note books, personal calendars, taped memos, tape recordings or other documentation prepared by the witness or which includes the thoughts or impressions of the witness for the time period of January 1, 1990 through December 31, 1990.

(5) all log books or note books any of the witnesses maintained, reviewed or relied upon when performing any business function related to the start-up of plant Vogtle after the Site Area Emergency.

The deposition of each and every individual identified above shall continue until the witness has fully testified about matters relevant to this proceeding and to matters generally discoverable as background material and relevant to the contention.

Intervenor requests that any objection to the production of documents set out in this notice be transmitted in writing to counsel for Intervenor on or before August 1, 1994.

Respectfully submitted,

Michael D. Kohn by MJW

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

301\notice.mj

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

DOCKETED
USNRC

28 *Re*
'94 JUL 29 P3:54

In the Matter of)

GEORGIA POWER COMPANY)
et al.,)

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

Docket Nos. 50-424-OLA-3

50-424-OLA-3

Re: License Amendment
(transfer to Southern Nuclear)

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

DEPUTY SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Notice of Deposition dated July 27, 1994 has been served this 27th day of July, 1994, by first class mail upon the persons listed in the attached Service List, with the exception that it was served by facsimile as indicated by "**".

By:

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

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-OLA-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
Oyster Point
Sunset Beach, NC 28468

Administrative Judge
Thomas D. Murphy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Charles A. Barth, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*John Lamberski, Esq.
Troutman Sanders
Suite 5200
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216

*Ernest L. Blake, Jr.
David R. Lewis
SHAW, PITMAN, POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037

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

301\cert.lis