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RELATED CORRESPONDENCE

DOCKETED
USNRCUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD JUL 26 P4:57

Before Administrative Judges:

Peter B. Bloch, Chair

Dr. James H. Carpenter

Thomas D. Murphy

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

INTERVENOR'S SEVENTH REQUEST
FOR INTERROGATORIES TO GEORGIA POWER COMPANYI. INTRODUCTION

Pursuant to 10. C.F.R. §2.740b, Allen Mosbaugh hereby requests that Georgia Power Company (hereinafter referred to as "GPC") answer the following interrogatories in writing and under oath, and produce any documents requested herein that have not already been produced.

II. INSTRUCTIONS

A. If you cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying and explaining your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

B. Each interrogatory is a continuing one, and should be supplemented as required by 10 C.F.R. §2.740(e).

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C. If you claim that any information which is required to be provided by you in your response to any of these interrogatories is privileged or immune from discovery:

1. Identify the portion of the interrogatory to which such information is otherwise the response;

2. If the information is a document or oral communication, identify the document's title or the oral communication and state the general subject matter of the document or oral communication;

3. If the information is a document or oral communication, state the date of the document or oral communication.

4. If a document, identify its author(s) and the person(s) for whom it was prepared or to whom it was sent, including all persons who received copies;

5. If an oral communication, identify all persons present at the time of the oral communication;

6. State the nature of the privilege or immunity claimed; and

7. State in detail each and every fact upon which you base your claim of privilege or immunity from discovery.

D. In each case where you are asked to identify or to state the identify of a document or where the answer to the interrogatory refers to a document, state with respect to each such document:

1. The identify of the person who prepared it;

2. The identity of all persons who reviewed or approved it;

3. The identity of the person who signed it, or over whose name it was issued;

4. The identity of the addressee or addressees;

5. The nature and substance of the document with sufficient particularity to enable the same to be identified;

6. The date of the document; and

7. The present location of the document and the identity and address of each person who has custody of the document.

E. In each case where you are required to identify an oral communication, or where the answer to the interrogatory refers to an oral communication, state with respect thereto:

1. The date and place thereof;

2. The identity of each person who participated in or heard any part of the communication;

3. If the communication was by telephone, so indicate and state who initiated the telephone call;

4. The substance of what was said by each person who participated in the communication; and

5. The location and the identity and address of the custodian of any document (including any mechanical, magnetic, electrical or electronic recording) that recorded, summarized, reported or confirmed the oral communication.

F. In each instance where you are asked to identify or state the identity of a person, or where the answer to an interrogatory refers to a person, state with respect to each such person:

1. His/her name;
2. His/her last known business and residence addresses and telephone numbers;
3. If an individual, his/her business affiliation or employment at the date of the transaction, event or matter referred to; and
4. If a corporation or association, the business or activity in which it was engaged at the date of the transaction, event or matter referred to.

III. DEFINITIONS

A. As used herein, the terms "Licensee", "Georgia Power Company", "The Southern Company", "SONOPCO", "you", or "Your" and any synonym thereof and derivative therefrom are intended to, and shall, embrace and include every agent or employee of Georgia Power Company, The Southern Company, and/or SONOPCO, past or present, their counsel and all their respective agents, servants, associates, employees, representatives, private investigators, and others who are or have been in possession of or may have obtained information for or on behalf of each person listed in any manner with respect to any matter referred to in these interrogatories.

B. As used herein, the term "documents" includes 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 Licensee or any employees, representatives, attorneys, investigators, or others acting on his behalf.

C. As used herein, the terms "and" and "or" shall each mean and/or.

D. As used herein, the "Allen Mosbaugh" and the term "petitioner" or "intervenor" shall mean Allen Mosbaugh, the Intervenor in this proceeding.

E. As used herein, the term "date" shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

F. As used herein, the term "person" shall mean any individual, partnership, firm, association, corporation or other government, legal or business entity.

G. As used herein, the term "detail" and the phrases "state in detail" and "describe in detail" shall mean that you are requested to state, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event and date, relating to or otherwise pertaining to the matters inquired of in said interrogatory.

H. As used herein, the term "NRC" shall mean the U.S. Nuclear Regulatory Commission, an agency of the Federal Government, and any and all offices within the Nuclear Regulatory Commission, including NRC Staff, NRC Office of Investigations, and all their respective attorneys, agents, servants, associates, employees, representatives, investigators.

IV. INTERROGATORIES

1) In respect to all analysis performed prior to any hearing held in this proceeding concerning any trip, failure or problem¹ experienced by any of Plant Vogtle's diesel generators. (1A, 1B, 2A and/or 2B) between Jan 1, 1990 and present, provide the following information:

a) State the cause(s) or suspected cause(s) of the failure, trip, or problem;

¹ As herein used the term "Problem" is used as in the April 9, 1990 Corrective Action response letter.

b) State whether the cause or causes were determined to constitute the "root cause" for the trip, failure or problem;

c) State whether the analysis indicated any similarity with any other failure, trip or problem experienced;

d) State whether any form of "root cause" assessment was ever determined;

e) State whether any corrective action was taken or planned.

2) The April 9, 1990 COA states on page 3, No. 4, that "GPC has reviewed air quality of the diesel generator air system including dewpoint control." With respect to this statement respond to the following:

a) Who was responsible for conducting this review;

b) What source documents were inspected or reviewed;

c) How was the information transmitted to the drafter of the COA.

3) The April 9, 1990 COA on page 3, No. 4 states that "initial reports of higher than expected dewpoints were later attributed to faulty instrumentation". With respect to this statement, respond to the following:

a) Identify each and every piece of faulty equipment believed to be responsible for the higher than expected readings;

b) Identify the author of this phase;

c) What documents were relied upon to conclude instruments were faulty; Who relied upon this information; and,

What form of verification was conducted to determine the accuracy of this information.

4) State whether any engineers, managers or technicians observed water "pouring out" of any diesel trips line(s).

5) State the identity of any technician or personnel who saw a jar of fluid which came from a diesel trip line.

6) Identify any personnel with knowledge of water in the diesel starting air system or the diesel air receivers. For each such person state the sum and substance of their knowledge (including how they obtained it, who they learned it from and anyone they told of it.)

7) State who witnessed and performed the "initial inspection of one air receiver on April 6, 1990," identified in the April 9, 1990 COA. For each such person identified state whether they observed any residue in the receiver.

8) State the date and time the air receiver identified in interrogatory 7 above, was ever subjected to an internal inspection. With respect to each such inspection state:

- a) What residue was found;
- b) Whether any water was located;
- c) Identify any records of each such inspection.

9) Identify all procedures and requirements contained in the MT&E Program or any other program that must be followed when a piece of test equipment, specifically any ALNOR, EG&G or any other dewpoint necessary equipment is:

- a) suspected of being out of calibration;

- b) out of calibration;
- c) suspected of being faulty;
- d) determined to be faulty.


10) State what, if any, action required under any procedure addressed in interrogatory 9 above, was taken with respect to any piece of test equipment suspected of being faulty in the April 9, 1990 COA.

11) With respect to diesel generator 1B, state the start number, date and time when "the bugs" were worked out according to Mr. Bockhold.

12) State the date and times dryers were out of service in 1990. Provide information as to what records were maintained and a summary of information contained in those records for the year 1990. If no records exist or are maintained, then so state.

13) state all factual information contained in any outside operator round sheets concerning moisture or water when "blowing down" any diesel air receiver from June 1989 to June 1991.

Respectfully submitted,


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Attorney for Intervenor

DATED this 25th day of July 1994.

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

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CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Seventh Set of Interrogatories to Georgia Power Company has been served this 25th 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 hand delivery as indicated by "*".

By: *Mary Jane Wilmoth*

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