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RELATED CORRESPONDENCE

DOCKETED
USNRC
July 22, 1994

UNITED STATES OF AMERICA

'94 JUL 25 A11:45

NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

In the Matter of)

) Docket Nos. 50-424-OLA-3

) 50-425-OLA-3

GEORGIA POWER COMPANY,)

et al.)

) Re: License Amendment

) (Transfer to Southern

(Vogtle Electric Generating)

) Nuclear)

Plant, Units 1 and 2))

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

GEORGIA POWER COMPANY'S RESPONSES TO INTERVENOR'S
FIFTH INTERROGATORY AND DOCUMENT REQUEST

I. INTRODUCTION

Georgia Power Company ("GPC") hereby responds to Intervenor's Fifth Interrogatory and Document Request to Georgia Power, dated July 8, 1994 (the "Fifth Request"). This response addresses Interrogatory Nos. 1, 2, 6-9, 11, 12, 15, and 16. GPC's response to Document Request Nos. 3-5, 10, 13, 15, 17, and 18 will be provided by August 8, 1994. GPC notes that some responses to these interrogatories state an objection on the ground that Intervenor continues to seek information which is outside the scope of discovery established by the Board's Memorandum and Order (Scope of Discovery), dated June 2, 1994.

II. GENERAL OBJECTIONS

A. GPC objects to Instruction D of the Fifth Request (p. 3) which requires GPC to provide detailed information with respect to each document referred to in any of the

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D503

interrogatory responses. Given that Intervenor is intimately familiar with most of these documents, GPC objects to providing detailed information about those documents on the grounds that it would be unduly burdensome and oppressive.

B. As a general matter, GPC objects to Intervenor's definition of "Licensee," "Georgia Power Company," "The Southern Company," and "SONOPCO," and consequently to interrogatories which request information known to "GPC" as defined by Intervenor. Intervenor defines these terms as including every agent or employee of GPC, The Southern Company, and/or SONOPCO, past or present, their counsel and all their respective agents, servants, associates, employees, representatives, and private investigators, and others who are or have been in possession of or may have obtained information for or on behalf of any of those entities. As a result, Intervenor would have GPC conduct an investigation as to the knowledge of every employee, agent or representative of each of these companies and individuals. Such an investigation of each of Intervenor's interrogatories would be unduly burdensome and oppressive. Without waiving this objection, GPC has endeavored to respond to Intervenor's interrogatories and document requests by making a reasonable inquiry of those individuals who GPC believes have material information related to these requests.

C. GPC generally objects to the identification, or disclosure, of those communications and documents which are subject to the attorney work product doctrine or the attorney-client communication privilege. GPC has been defending actions initiated by Intervenor since mid-1990. In addition to this proceeding, such actions include (1) NRC inspections, an NRC Office of Investigations ("OI") investigation, and an NRC enforcement

action respecting those allegations lodged by Intervenor in the Hobby/Mosbaugh Petition related to the diesel generator statements issue, (2) three separate actions before the Department of Labor, (3) an investigation by the Department of Justice, and (4) an inquiry by a Congressional Subcommittee. GPC's legal counsel has been heavily involved in the defense of these actions and, as a result, has generated a large number of documents in preparation of such defenses. It would be oppressive and unduly burdensome and expensive for GPC to identify each and every one of such documents which are subject to either or both of (1) the attorney work product doctrine (i.e., they were prepared by legal counsel in anticipation of litigation and their disclosure would reveal the mental impressions of legal counsel), or (2) the attorney-client communication privilege (i.e., communications from GPC to its legal counsel made in confidence for the purpose of obtaining legal advice and counsel).

III. RESPONSES TO INTERROGATORIES

1. (Webb) GPC is not aware of the existence today of the diesel start list that was prepared by Mr. Webb on April 19, 1990.

2. (Aufdenkampe, Odom, Webb) Mr. Webb completed his task of listing diesel starts on April 19, 1990, and recalls providing the list to Mr. Odom. He recalls Mr. Odom stating that he had given the list to "the man down the hall." Mr. Webb understood this to mean that the list had been given to either Mr. Aufdenkampe or Mr. Mosbaugh. Mr. Webb does not recall ever copying the document. The documents used to prepare the list were the Vogtle Unit 1 Control Room logs (i.e., the Shift Supervisor's log and the Unit Control log). GPC believes that the last person to have the list was Mr. Mosbaugh. No one currently

employed by GPC recalls seeing the diesel start list after it was provided to Mr. Mosbaugh on April 19, 1990.

6. (Kochery) GPC believes the NRC first discussed the possibility of quarantining components on March 23, 1990. See NRC Confirmation of Action Letter, dated March 23, 1990.

7. (Kochery) Mr. Kochery recalls that someone may have told him that water was discovered in the 2" air start line, but does not recall who told him.

8. (Holmes) Mr. Holmes does not recall any individual informing him that there may be water in the diesel trip lines.

9. (Kochery) GPC interprets this interrogatory as seeking information concerning who from Cooper Industries provided on-site assistance to GPC following the March 20, 1990 event. Personnel who assisted GPC were Messrs. Sheldon Owyong, Robert Johnston, and Donald Pesout.

11. (Dixon, Walker) No.


12. (Bailey, Sheibani) GPC objects to this interrogatory as being overbroad to the extent that it requests the identification of files or file listings related to matters that are outside the scope of this proceeding. Without waiving this objection, GPC notes that the individuals named in this interrogatory did not personally have computers in their workplace during the March 20, 1990 to August 30, 1990 time frame. Their secretaries created files on their behalf using Xerox Memorywriter typewriters. The relevant file list for Mr. Bockhold, and corresponding documents, have been previously produced. Mr. Bailey's file list includes two documents that may be related to the scope of this proceeding. A copy of these

documents is attached. Mr. Kitchen's file list includes four relevant documents, which are also attached. The file lists for Messrs. Hairston, McCoy and Stringfellow are either blank or include only documents regarding matters not related to this proceeding.

15. (Domby, Bailey) GPC interprets this interrogatory as requesting the identity of FOIA requests filed by GPC. GPC objects to this interrogatory to the extent it requests the identification of FOIA requests regarding the Site Area Emergency (other than matters related to diesel generators) as being outside the scope of this proceeding. A file search identified the following FOIA requests responsive to the unobjectionable portion of this interrogatory: FOIA-91-305, 306, 458, 459, 468, 515, 516; 92-150, 151, 330, 338; 93-555.

16. (Warren) The individual whose name is listed as the supervisor or coordinator on the document identified in this interrogatory is Mr. Fred Warren. Mr. Warren was responsible for filling out the document.

Respectfully submitted,



John Lamberski

TROUTMAN SANDERS
Suite 5200
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216
(404) 885-3360

Ernest L. Blake
David R. Lewis

SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20337
(202) 663-8084

Counsel for Georgia Power Company

Dated: July 22, 1994

INTERROGATORY NO. 12

DOCUMENTS PRODUCED BY MR. JAMES A. BAILEY

ELV-01469
0312

Docket No. 50-424

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
WAIVER OF COMPLIANCE

This letter is a follow-up written request for a waiver of compliance for Georgia Power Company's Vogtle Electric Generating Plant Unit 1. A one-time Technical Specification waiver of compliance was requested to make Technical Specification 3.0.4 not applicable to Technical Specification 3.8.1.2. This waiver was required to allow entry into Mode 5 with the operability of Diesel Generator 1A and its associated load sequencer verified. The Plant Review Board has reviewed and approved this waiver.

This waiver was necessary because recent failures of the Unit 1, Train A Diesel Generator and its associated load sequencer rendered their operability questionable. Even though an extensive investigation is being conducted, the specific cause of the failure of this equipment has not been identified.

The current Reactor Coolant System water level is at mid-loop. This waiver allows tensioning of the Reactor Pressure Vessel head which also allows filling and venting of the Reactor Coolant System. Filling and venting the RCS will result in an increase in RCS water inventory and make the steam generators available for heat removal should they be required. As additional compensatory action, on-shift operators have been briefed on the condition of the equipment and how to respond by manually initiating a Diesel Generator emergency start should it be required.

This is a one-time request due to present plant conditions and equipment status.

Since Technical Specification 3.8.1.2 action requirements are the same for Modes 5 and 6 the probability of occurrence and consequences of an accident are not increased by this request and no significant safety hazards are involved. The additional inventory and addition of the steam generators as an available heat sink improves the margin of safety.

U. S. Nuclear Regulatory Commission
ELV-01469
Page Two

Since no change in plant design occurs as a result of this waiver of compliance and since the plant is being placed in an improved condition with respect to water inventory and available heat sinks, no adverse environmental effects are involved.

Sincerely,

R. P. McDonald

RPM/HWM/gm

xc: Georgia Power Company
Mr. C. K. McCoy
Mr. G. Bockhold, Jr.
Mr. R. M. Odom
Mr. P. D. Rushton
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. T. A. Reed, Licensing Project Manager, NRR
Mr. R. F. Aiello, Senior Resident Inspector, Vogtle

VOGTLE SITE EMERGENCY
MARCH 20, 1990

PLANT CONDITIONS

- o Unit 1 was in a refueling outage and Unit 2 was operating at 100% power.
- o Unit 1 was in mid-loop in operational Mode 6.
- o The RCS level was being maintained at mid-loop for valve repairs and S/G manway restoration.
- o The Unit 1 B reserve auxiliary transformer (RAT) was tagged out of service for maintenance.
- o The Unit 1 B emergency diesel generator (EDG) was tagged out of service and disassembled for maintenance.
- o The Unit 1 A RAT was supplying offsite power to the crosstied Unit 1 A and B vital buses.
- o The reactor coolant system (RCS) temperature was being maintained at around 90 degrees Fahrenheit (F) via the train A residual heat removal (RHR) pump, the train B pump was in standby.
- o The vessel head was in place with the bolts not fully tensioned.
- o The pressurizer manway cover was removed.
- o The containment equipment hatch and the containment personnel hatch were open
- o Non-vital power was provided via a backfeed thru the main generator transformer.

VOGTLE SITE EMERGENCY
MARCH 20, 1990

EVENT

- o At about 9:20 a.m. a truck backed into a support column for the feeder line supplying power to the Unit 1A RAT and the Unit 2B RAT.
- o The insulator for the C phase of the feeder line fractured and initiated a phase-to-ground electrical fault.
- o The fault resulted in a loss of power to the 1A and 2B RATs.
- o The 2B EDG started and loaded to the deenergized Unit 2 vital bus.
- o Unit 2 tripped because of an improperly connected differential current transformer. (Wrong tap setting)
- o Loss of 1A RAT deenergized both Unit 1 vital buses. (i.e., loss of power to RHR pump)
- o Unit 1A EDG started on bus undervoltage and shut down after about one minute and 20 seconds.
- o Declared site area emergency about 9:40.
- o About 18 minutes after the first 1A EDG started, operators locally reset load sequencer and EDG started on UV.
- o After about one minute and ten seconds EDG shut down again.
- o At about 9:56 a.m. operators performed an "Emergency" manual start which bypassed most of the EDG protective trips.
- o The EDG started and loaded the bus, a RHR pump was restarted and core cooling was re-established.
- o Site Area Emergency downgraded to "Alert" at about 10:15 a.m.
- o Reactor coolant system heated up to 136 degrees F from 90 degrees F before EDG was started.
- o Emergency was terminated at 1:47 p.m.

INTERROGATORY NO. 12

DOCUMENTS PRODUCED BY MR. W.F. KITCHENS

050

CURRENT EVENTS MEMOMAY 24, 1990
PLANT YOGTLE UNIT 1

On May 23, 1990 at 1228 hours (CST), the Unit 1 train B emergency diesel generator tripped during a surveillance test. This surveillance test was performed following calibration of three jacket water temperature switches. (The temperature switch calibration was a corrective action taken as a result of a previous diesel generator failure on March 20, 1990.) The 1B diesel generator was declared inoperable following the engine trip, and actions taken per the technical specifications. Troubleshooting following this trip failed to immediately identify the root cause of the failure.

An event review team has been established to evaluate the problem, and determine the root cause. Glen McCarley, ISEG Supervisor, is the event review team leader.

031

DG 18 TROUBLESHOOTING PLAN

Vent JW temperature switches prior to each start.
Monitor P-3 operation for each start.
Snoop each JW temperature switch during start.
Monitor JW temperature during each run and record.
Any problems stop and have meeting.

1. Perform 3 local emergency starts with "old" switches installed
2. Calibrate new P-3 to lower setpoint (in I & C Shop)
3. Perform 1 (or more) normal starts with existing P-3
4. Install new P-3 with lower setpoint
5. Perform 3 normal starts with new P-3
6. Perform Operations surveillance

005

SHIFT BRIEFINGUNIT 1 DIESEL GENERATOR EMERGENCY TRIPS FOR HIGH JACKET WATER TEMPERATURE AND LOW LUBE OIL PRESSURE

On an emergency start of the Diesel Generator (DG), only four engine trips remain active: (A) Engine overspeed, (B) 186A Relay, (C) High Jacket Water Temperature (2 of 3), and (D) Low Lube Oil Pressure (2 of 3).

The High Jacket Water Temperature trip, once the engine has tripped on high water temperature, may be reset (bypassed) by pushing the "EMERGENCY STOP RESET" button locally on the engine control panel. Once reset, the engine will auto restart and the high jacket water temperature trip will no longer be active.

NOTE: DO NOT push the Reset from LOCA button as this will re-enstate the trip resulting in another engine trip.

At this time, it is unknown whether the Low Lube Oil Pressure trip can be reset using this method. The problem arises from the implementation of the DCP that added the flow orifices in the lube oil lines to maintain pressure for 70-90 seconds after engine shutdown. Engineering is evaluating this situation and information will be passed along as soon as it becomes available.

001

UNIT 1 A TRAIN DIESEL GENERATORAIR RECEIVER DEW POINT MEASUREMENTS

<u>WFO NO.</u>	<u>DATE</u>	<u>RECEIVER K01</u>	<u>RECEIVER K02</u>
19001651	4/8/90	34°F	33°F
19001513	3/31/90	80°F	60°F
19000899	3/12/90	48°F	45°F
	3/9/90	61°F	66°F
19000465	2/11/90	37°F	37°F
18906445	1/18/90	44°F	44°F
18906199	12/19/89	40°F	37°F
18905007	11/20/89	40°F	47°F
18904442	10/20/89	38°F	45°F
18903652	9/27/89	45°F	45°F
18903214	8/24/89	37°F	35°F
18902798	7/30/89	45°F	49°F
18902453	6/28/89	48°F	K02 was tagged out for maintenance
18900984	3/16/89	22.6°F	20.1°F

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
	:	Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY, et al.	:	50-425-OLA-3
	:	
(Vogtle Electric Generating Plant,	:	Re: License Amendment
Units 1 and 2)	:	(Transfer to
	:	Southern Nuclear)
	:	
	:	ASLBP NO. 93-671-OLA-3

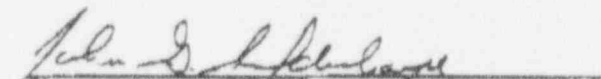
AFFIDAVIT OF JOHN G. AUFDENKAMPE

I, John G. Aufdenkampe, being duly sworn, state as follows:

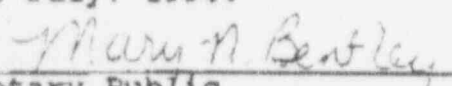
1. I am currently employed by Southern Company Services as Design Team Leader, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


John G. Aufdenkampe

Sworn to and subscribed
before me this 22nd day
of July, 1994.


Notary Public
My commission expires:

May 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF JAMES A. BAILEY

I, James A. Bailey, being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as Manager-Licensing, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 12.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

James A. Bailey
James A. Bailey

Sworn to and subscribed
before me this 22nd day
of July, 1994.

Mary R. Bentley
Notary Public

My commission expires:
1-1-95

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

AFFIDAVIT OF ESTER R. DIXON

I, Ester R. Dixon, being duly sworn, state as follows:

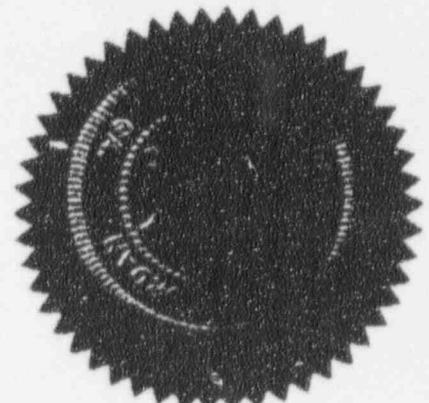
1. I am currently employed by Georgia Power Company as Senior Secretary, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 11.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Ester R. Dixon
Ester R. Dixon

Sworn to and subscribed
before me this 22nd day
of July, 1994.

Clara H. Jordan
Notary Public
My commission expires:
4-8-95



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

In the Matter of

GEORGIA POWER COMPANY,
et al.

(Vogtle Electric
Generating Plant,
Units 1 and 2)

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Docket No. 50-424-OLA-3
50-435-OLA-3

Re: License Amendment
(Transfer to Southern
Nuclear)

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

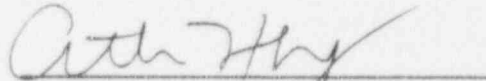
AFFIDAVIT OF ARTHUR H. DOMBY

I, Arthur H. Dombey, being duly sworn, state as follows:

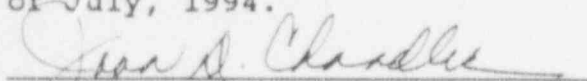
1. I am a partner in the law firm of Troutman Sanders, where I have practiced law since being admitted to the State Bar of Georgia in 1979. I am also admitted to practice in the State of New York.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 15.

I hereby certify that the statements and opinions in such responses are true and correct to the best of my personal knowledge and belief.


Arthur H. Dombey

Sworn to and subscribed
before me this 21st day
of July, 1994.


Notary Public

My commission expires:

My Commission Expires February 18, 1997

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY, et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

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

Re: License Amendment
(Transfer to
Southern Nuclear)

ASLBP NO. 93-671-OLA-3

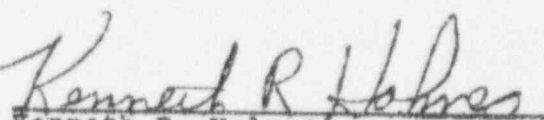
AFFIDAVIT OF KENNETH R. HOLMES

I, Kenneth R. Holmes, being duly sworn, state as follows:

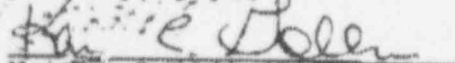
1. I am currently employed by Georgia Power Company as Manager-Operations, Vogtle Electric Generating Plant.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 8.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


Kenneth R. Holmes

Sworn to and subscribed
before me this 22 day
of July, 1994.


Notary Public
My commission expires:
5/30/95

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

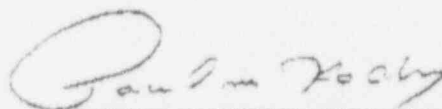
In the Matter of	:	
	:	Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY, <u>et al.</u>	:	50-425-OLA-3
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	:	Re: License Amendment
(Vogtle Electric Generating Plant,	:	(Transfer to
Units 1 and 2)	:	Southern Nuclear)
	:	
	:	ASLBP NO. 93-671-OLA-3

AFFIDAVIT OF PAUL M. KOCHERY

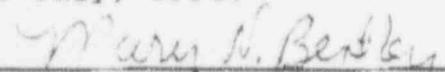
I, Paul M. Kochery, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Engineering Supervisor, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the responses to Interrogatory Nos. 6, 7, and 9.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


Paul M. Kochery

Sworn to and subscribed
before me this 22nd day
of July, 1994.


Notary Public
My commission expires:
July 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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GEORGIA POWER COMPANY, et al.	:	Docket Nos. 50-424-OLA-3
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Units 1 and 2)	:	(Transfer to
	:	Southern Nuclear)
	:	
	:	ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF RICHARD M. ODOM

I, Richard M. Odom, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Engineering Supervisor, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Richard M. Odom
Richard M. Odom

Sworn to and subscribed
before me this 22ND day
of July, 1994.

Mark A. Bentley
Notary Public
My commission expires:
May, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
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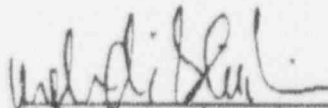
AFFIDAVIT OF MEHDI SHEIBANI

I, Mehdi Sheibani, being duly sworn, state as follows:

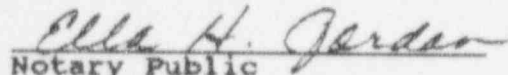
1. I am currently employed by Georgia Power Company as Engineering Supervisor, Vogtle Electric Generating Plant.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 12.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.


Mehdi Sheibani

Sworn to and subscribed
before me this 22nd day
of July, 1994.


Notary Public
My commission expires:
4-8-95



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	:	
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(Vogtle Electric Generating Plant,	:	Re: License Amendment
Units 1 and 2)	:	(Transfer to
	:	Southern Nuclear)
	:	
	:	ASLBP NO. 93-671-OLA-3

AFFIDAVIT OF FRED C. WARREN

I, Fred C. Warren, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Outage Area Coordinator, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the response to Interrogatory No. 16.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

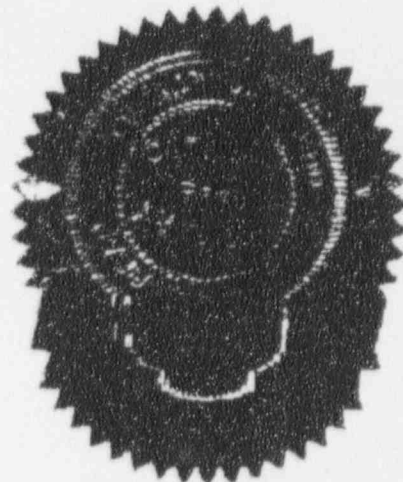
F. C. Warren
Fred C. Warren

Sworn to and subscribed
before me this 22nd day
of July, 1994.

William H. Jordan
Notary Public

My commission expires:

4-8-95



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

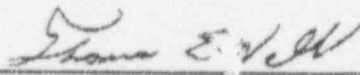
In the Matter of :
GEORGIA POWER COMPANY, et al. : Docket Nos. 50-424-OLA-3
 : 50-425-OLA-3
 :
(Vogtle Electric Generating Plant, : Re: License Amendment
Units 1 and 2) : (Transfer to
 : Southern Nuclear)
 :
 : ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF THOMAS E. WEBB

I, Thomas E. Webb, being duly sworn, state as follows:

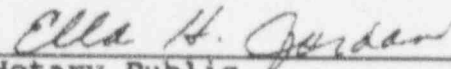
1. I am currently employed by Georgia Power Company as Senior Engineer, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Fifth Interrogatory and Document Request, specifically the responses to Interrogatory Nos. 1 and 2.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

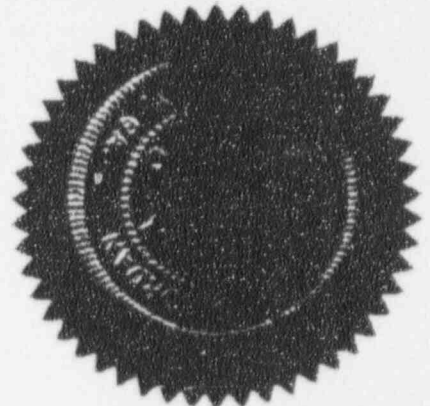


Thomas E. Webb

Sworn to and subscribed
before me this 22nd day
of July, 1994.



Notary Public
My commission expires:
4-8-95



DOCKETED
JUL 22, 1994

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

'94 JUL 25 A11:45

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

GEORGIA POWER COMPANY,
et al.

(Vogtle Electric
Generating Plant,
Units 1 and 2)

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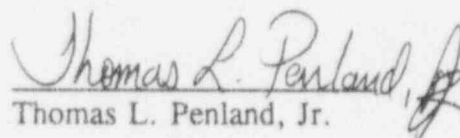
Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(Transfer to Southern
Nuclear)

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

CERTIFICATE OF SERVICE

I hereby certify that copies of Georgia Power Company's Responses to Intervenor's Fifth Interrogatory and Document Request, dated July 22, 1994, were served by express mail upon the persons listed on the attached service list or, where indicated by an asterisk, by U.S. mail, this 22nd day of July, 1994.


Thomas L. Penland, Jr.

TROUTMAN SANDERS
Suite 5200
600 Peachtree Street, N.E.
Atlanta, Georgia 30308-2216
(404) 885-3360

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

In the Matter of
GEORGIA POWER COMPANY,
et al.

* Docket Nos. 50-424-OLA-3
* 50-425-OLA-3
*
*
*
* Re: License Amendment
* (Transfer to Southern
* Nuclear)
*
* ASLBP No. 93-671-01-OLA-3
SERVICE LIST

(Vogtle Electric
Generating Plant,
Units 1 and 2)

Administrative Judge
Peter B. Bloch, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Administrative Judge
James H. Carpenter
Atomic Safety and Licensing
Board
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
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Michael D. Kohn, Esq.
Kohn, Kohn & Colapinto, P.C.
517 Florida Avenue, N.W.
Washington, D.C. 20001

Office of Commission Appellate
Adjudication
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

*Stewart D. Ebnetter
Regional Administrator
USNRC, Region II
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Washington, D. C. 20555
ATTN: Docketing and
Services Branch

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*Director,
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Resources
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