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RELATED CORRESPONDENCE

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USNRC
August 8, 1994

UNITED STATES OF AMERICA '94 AUG -9 P2:55

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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 ADDITIONAL RESPONSE TO INTERVENOR'S
FIFTH INTERROGATORY AND DOCUMENT REQUEST

I. INTRODUCTION

Georgia Power Company ("GPC") hereby provides an additional response to Intervenor's Fifth Interrogatory and Document Request to Georgia Power Company, dated July 8, 1994 (the "Fifth Request"). This response addresses document request nos. 3-5, 10, 13, 14, 17, and 18 of the Fifth Request.¹

A number of the document requests in the Fifth Request are objectionable as overbroad in that Intervenor seeks information beyond the scope of discovery established by the Board's Memorandum and Order (Scope of Discovery), dated June 2, 1994. GPC has endeavored to identify and make available those documents which, based on a reasonable

¹ GPC previously provided its response to the interrogatories in Intervenor's Fifth Request. See Georgia Power Company's Responses to Intervenor's Fifth Interrogatory and Document Request, dated July 22, 1994.

inquiry, appear relevant to the diesel statements at issue in this proceeding or may lead to the discovery of admissible evidence. In addition, GPC incorporates herein each of the General Objections stated in Georgia Power Company's Responses to Intervenor's Fifth Interrogatory and Document Request (July 22, 1994), at 1-3.

II. RESPONSES TO DOCUMENT REQUESTS

3. GPC objects to this document request to the extent it seeks voluminous documents from 1989 to present on the grounds that it is unduly burdensome and overbroad as seeking information which is outside the scope of this proceeding. Without waiving such objections, the Outside Areas Operator Rounds Sheets for 1989 and 1990 are available to Intervenor for inspection and copying in the Atlanta offices of GPC's counsel except for the following dates (these sheets are missing from the Vogtle Document Control Center): Unit 1 -- June 25 and 26, 1990; Unit 2 -- January 1 - 20, 1989, October 11 - 20, 1989, and December 12 - 16, 1989.

4. GPC objects to this document request to the extent it seeks documents from March 20, 1990 to present on the grounds that it is unduly burdensome and overbroad as seeking information which is outside the scope of this proceeding. Without waiving such objections, GPC has already produced the maintenance work order package documenting the April 6, 1990 inspection of the EDG 1A air receiver. See Georgia Power Company's Additional Response to Intervenor's Fourth Interrogatory and Document Request, dated July 29, 1994, at 5 (Bates Nos. 065977 - 065981). No other air receiver inspections were identified for 1990.

5. GPC objects to this document request to the extent it seeks documents from 1989 to present on the grounds that it is unduly burdensome and overbroad as seeking information which is outside the scope of this proceeding. Without waiving these objections, GPC has already produced over 60,000 pages of documentation related to the Vogtle diesel generators and is unaware of any other documentation responsive to this request.

10. GPC objects to this document request to the extent it seeks all documents contained in "BASE SYSTEM" files on the grounds that it is unduly burdensome and oppressive and overbroad as seeking information which is outside the scope of this proceeding. Without waiving such objections, GPC believes it has already produced all relevant documents responsive to this request. See Georgia Power Company's Responses to Intervenor's Fifth Interrogatory and Document Request, dated July 22, 1994, at 4 (response to interrogatory no. 12).

13. See GPC's response to Document Request No. 10 above.

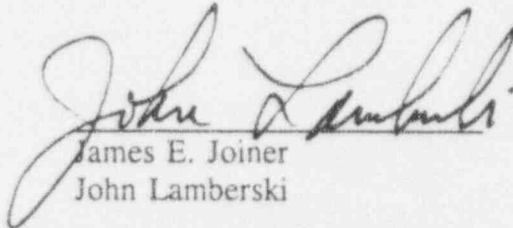
14. GPC objects to this document request to the extent it seeks documents unrelated to the diesel generator reporting matter at issue in this proceeding on the grounds that it is unduly burdensome and overbroad as seeking information which is outside the scope of this proceeding. Without waiving such objections, GPC is not aware of any relevant documents responsive to this request that have not been produced and are not available in the NRC's Public Document Room.

17. GPC objects to this document request on the grounds that it is overbroad and unreasonably cumulative and duplicative. GPC has responded to all of Intervenor's

document requests. GPC incorporates herein its prior responses, including all general and specific objections to such document requests.

18. GPC objects to this document request to the extent that it seeks documents that are privileged attorney-client communications or subject to the attorney work product doctrine. Otherwise, GPC is unaware of documents responsive to this request that have not been produced.

Dated: August 8, 1994



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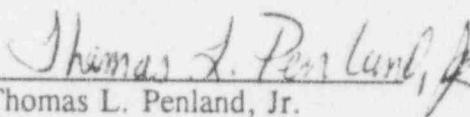
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)	ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

I hereby certify that copies of Georgia Power Company's Additional Response to Intervenor's Fifth Interrogatory and Document Request, dated August 8, 1994, were served by express mail upon the persons listed on the attached service list this 8th day of August, 1994.


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

In the Matter of
GEORGIA POWER COMPANY,
et al.

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

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Generating Plant,
Units 1 and 2)

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