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RELATED CORRESPONDENCE

DOCKETED  
USABC  
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 RESPONSE TO  
INTERVENOR'S SEVENTH REQUEST FOR INTERROGATORIES

I. INTRODUCTION

Georgia Power Company ("GPC") hereby responds to Intervenor's Seventh Request for Interrogatories to Georgia Power Company, dated July 25, 1994 (the "Seventh Request"). A number of GPC's responses 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. Based on statements by Intervenor's counsel at the July 29, 1994 Status Conference (Tr. 554), GPC interprets the Seventh Request as a request for interrogatory responses only, and not as a request for documents.

II. GENERAL OBJECTIONS

A. GPC objects to Instruction D of the Seventh Request (pp. 2, 3) which requires GPC to provide detailed information with respect to each document referred to in any of the

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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. GPC also objects to Instructions E (p. 3) and F (p. 4) of the Seventh Request which require detailed information concerning every oral communication and person referred to in each of GPC's responses to interrogatories. Compliance with such instructions would be unduly burdensome and oppressive.

C. 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 by making a reasonable inquiry of those individuals who GPC believes have material information related to these requests.

D. 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 Investigation ("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. (Burr, Stokes) GPC objects to this interrogatory to the extent it requests information on the Vogtle emergency diesel generators ("EDGs") from January 1, 1990 to present on the grounds that such request is overbroad and seeks information that is outside the scope of discovery established by the Board in this proceeding. Without waiving this

objection, GPC has attached a table that provides the information requested for 1990, through August 30,<sup>1</sup> in chronological order.

2.a. (Bockhold, Burr, Burwinkel, Horton, Kitchens, Kochery, Stokes) The review was based on activities conducted by I&C technicians, plant equipment operators, system engineers, and maintenance personnel under the overall direction of the Vogtle General Manager, Mr. George Bockhold.

2.b. (Bockhold, Burr, Burwinkel, Horton, Kitchens, Kochery, Stokes) GPC is unaware of source documents that were inspected or reviewed.

2.c. (Aufdenkampe, Bailey, Bockhold, Kitchens, Rushton, Ward) GPC is unable to determine who drafted the quoted statement or knew the information was transmitted to the drafter.

3.a. (Duncan, Hobbs, Kitchens) VP-2466 (Alnor 7200U).

3.b. (Aufdenkampe, Bailey, Bockhold, Kitchens, Rushton, Ward) GPC is unable to determine who authored the quoted statement.

3.c. (Aufdenkampe, Bockhold, Burr, Burwinkel, Horton, Kitchens, Kochery, Stokes) GPC is unaware of any documents (other than Intervenor's Deposition Exhibit 44, Bates No. 46072) that were relied upon to conclude the instruments were faulty. GPC believes Mr. Mark Briney relied upon the Exhibit 44 notes and that the conclusion was based on the fact that the dew point measurements for all eight air receivers were outside the acceptance range

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<sup>1</sup> Based on the Board's August 8, 1994 Memorandum and Order (Intervenor's Seventh Set of Interrogatories), GPC has limited its response regarding the information requested to August 30, 1990. Id. at 2.

at the same time (which was contrary to previous measurements). GPC is unaware whether or not this conclusion was independently verified at the time.

4. (Coursey, Burr, Hobbs, Kochery, Stokes) No.

5. (Coursey, Burr, Hobbs, Kochery, Stokes) No one currently employed by GPC who would reasonably be expected to possess such information recalls ever seeing a jar of fluid which came out of a diesel trip line.

6. (Kochery) See GPC's Response to Intervenor's Fifth Interrogatory and Document Request, dated July 29, 1994 at 4 (response to interrogatory no. 7).

7. (Burr, Holcomb, Kochery, Stokes) GPC notes that the interrogatory incorrectly quotes the April 9, 1990 Confirmation of Action letter. The quoted portion should read "internal inspection" not "initial inspection." Based on this clarification, Mr. J. B. Holcomb performed the inspection and Messrs. Ken Burr, Paul Kochery, and Ken Stokes witnessed the inspection. None of these individuals recalls observing residue in the receiver. However, GPC is aware that Mr. William Shipman, who was neither an inspector nor a witness to the inspection, wrote in his personal notes from April 11, 1990, that the April 6, 1990, internal inspection of the EDG 1A air receiver revealed "light rust film on welds, light oil film on bottom," but it "showed no degradation." Bates No. 015115.

8. (Burr, Holcomb, Stokes) GPC objects to this request to the extent it seeks information concerning any inspection ever done on the air receiver on the grounds it is unduly burdensome and overbroad in that it seeks information which is outside the scope of discovery established by the Board in this proceeding. Without waiving these objections, the only internal inspection the EDG 1A air receiver was subjected to in 1990 occurred on April

6. Based on Mr. Shipman's notes (discussed in interrogatory 7 above), GPC believes that a light rust film may have been found on the welds and a light oil film may have been found on the bottom of the air receiver. GPC has previously produced a copy of Mr. Shipman's notes and the maintenance work order documentation associated with the April 6, 1990 inspection. See GPC's Additional Response to Intervenor's Fourth Interrogatory and Document Request, dated July 29, 1994, at 5, and GPC's Additional Response to Intervenor's Fifth Interrogatory and Document Request dated August 8, 1994, at 2.

9. (Duncan, Hobbs) Vogtle Procedure 00208-C, "Control of Measuring and Test Equipment," states that measuring and test equipment ("M&TE") found to be out of calibration "shall be tagged or visibly identified as nonconforming and removed from service until adequate corrective measures have been taken." Id. at Step 4.1.1. Vogtle Procedure 20230-C, "Control of Instrument Shop Measuring and Test Equipment," states that "personnel using M&TE shall be responsible for ... reporting any malfunctions or suspected malfunctions to the Instrument Shop Supervisor ...." Id. at Step 4.1.2. A "hold tag" is affixed to the M&TE when calibration is due or otherwise required. Id. at Step 4.4.2. Calibration checks are performed in cases where the calibration of an instrument is in doubt or the normal calibration interval arises. Id. at 4.12.3.

10. (Duncan, Hobbs) A review of the M&TE Traveler associated with the instrument identified in Interrogatory 3.a. indicates that it was removed from service on April 6, 1990, and was not used again at Vogtle.

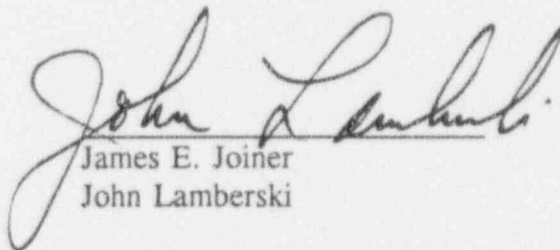
11. (Bockhold) Following start no. 136 on March 24, 1990 and prior to start no. 137 on March 27, 1990.

12. (Burr, Stokes) GPC objects to this interrogatory on the grounds it is unreasonably cumulative and duplicative in that it seeks information already provided to Intervenor. See GPC's Response to Allen L. Mosbaugh's Third Set of Interrogatories, dated June 10, 1994, at 38 (response to interrogatory no. 6, (Bates Nos. 064383-064422)) and GPC's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories, dated August 8, 1994.

13. (Sheibani) GPC objects to this interrogatory to the extent it requests information on the Vogtle EDGs for the 1991 time frame on the ground that such request is outside the scope of discovery established by the Board in this proceeding. Further, GPC objects to this request as it would require GPC to perform additional research and analyses which Intervenor is able to perform himself. Without waiving such objections, with respect to the information requested for 1989 and 1990, copies of the Outside Areas Operator Rounds Sheets are available to Intervenor for inspection and copying in the Atlanta offices of GPC's counsel. See GPC's Response to Intervenor's Fifth Interrogatory and Document Request, dated August 8, 1994 (response to document request no. 3).



Dated: August 8, 1994



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Counsel for Georgia Power Company



DATE START #	EDG #	A-CAUSE	B-ROOT CAUSE	C-SIMILARITY	D-TYPE ROOT CAUSE ASSESSMENT PERFORMED	E-CORRECTIVE ACTION
01/03/90 1-90-110	1B	EDG TRIPPED DUE TO LEAKING PRESSURE SENSOR ON RIGHT BANK TURBOCHARGER	SENSOR WAS DISCARDED PRIOR TO INVESTIGATION OF FAILURE MECHANISM	UNKNOWN	PER DC 1-90-0004 & SPECIAL REPORT 1-90-01	REPLACED THE LEAKING PRESSURE SENSOR
01/24/90 2-90-034	2A	EDG DID NOT START	INITIALLY UNABLE TO IDENTIFY CAUSE. LATER DETERMINED TO BE INADEQUATE CLEARANCE OF THE AIR START VALVES	NO	PER DC 2-90-0011 & SPECIAL REPORT 2-90-02	INCREASED AIR START VALVE CLEARANCE ONCE ROOT CAUSE WAS IDENTIFIED.
01/25/90 2-90-028	2A	EDG DID NOT START	INITIALLY UNABLE TO IDENTIFY CAUSE. LATER DETERMINED TO BE INADEQUATE CLEARANCE OF THE AIR START VALVES	YES	PER DC 2-90-0011 & SPECIAL REPORT 2-90-02	REPLACED AIR START DISTRIBUTOR FILTERS, INCREASED SURVEILLANCE FREQUENCY, INCREASED AIR START VALVE CLEARANCE ONCE ROOT CAUSE WAS IDENTIFIED.
02/11/90 2-90-041	2A	UPON CLOSING THE EDG BREAKER, REACTIVE LOAD BECAME VERY NEGATIVE AND COULD NOT BE ADJUSTED	INITIALLY BELIEVED PROBLEM WAS DUE TO FAILURE OF THE GATE FIRING MODULE ON THE BRIDGE CIRCUIT IN SERVICE. LATER DETERMINED TO BE IMPROPER PARALLELING OF THE EDG WITH THE GRID. PERSONNEL ERROR.	NO	PER SPECIAL REPORT 2-90-02	SWITCHED TO REDUNDANT BRIDGE CIRCUIT AND REPLACED THE GATE FIRING MODULE. VENDOR TESTING FOUND NO PROBLEM WITH THE GATE FIRING MODULE. LATER, REVISED THE PARALLELING PROCEDURE TO REDUCE PROBABILITY OF PICKING-UP NEGATIVE REACTIVE LOAD ON BREAKER CLOSURE. PERSONNEL WERE TRAINED REGARDING THE REVISED PARALLELING PROCEDURE.
03/20/90 1-90-139	1A	EDG STARTED IN RESPONSE TO LOSP, THEN TRIPPED	SEE EVENT REPORT 1-90-03 AND NUREG-1410	NO	PER EVENT REPORT 1-90-03	SEE NOTE 1
03/20/90 1-90-140	1A	EDG STARTED IN RESPONSE TO LOSP, THEN TRIPPED	SEE EVENT REPORT 1-90-03 AND NUREG-1410	YES	PER EVENT REPORT 1-90-03	SEE NOTE 1
03/21/90 1-90-120	1B	EDG DID NOT START DURING FIRST MAINT. RUN FOLLOWING 18-MONTH INSPECTION	FUEL SUPPLY LINES WERE NOT COMPLETELY FULL. THESE WERE DRAINED DURING MAINT. ACTIVITIES	YES	PER SPECIAL REPORT 1-91-01	NONE (THIS CONDITION SOMETIMES OCCURS FOLLOWING THIS TYPE OF MAINTENANCE ACTIVITY)
03/21/90 1-90-121	1B	EDG DID NOT START	FUEL SUPPLY LINES WERE NOT COMPLETELY FULL. THESE WERE DRAINED DURING MAINT. ACTIVITIES	YES	PER SPECIAL REPORT 1-91-01	NONE (THIS CONDITION SOMETIMES OCCURS FOLLOWING THIS TYPE OF MAINTENANCE ACTIVITY)
03/21/90 1-90-123	1B	STOPPED EDG DUE TO LOW OIL PRESSURE, LOW TURBO. OIL PRESSURE & HIGH FUEL OIL DIFFERENTIAL PRESSURE	OPERATOR DID NOT ALLOW ENOUGH TIME FOR GAUGES TO STABILIZE	NO	PER SPECIAL REPORT 1-91-01	NONE
03/21/90 1-90-124	1B	EDG STOPPED TO FURTHER INVESTIGATE HIGH FUEL OIL FILTER DIFFERENTIAL	OPERATOR DID NOT ALLOW ENOUGH TIME FOR GAUGES TO STABILIZE	YES	PER SPECIAL REPORT 1-91-01	NONE
03/22/90 1-90-132	1B	EDG TRIPPED WITH HIGH TEMP. LUBE OIL ANNUNCIATED	SENSOR CALIBRATION ERROR	YES	PER SPECIAL REPORT 1-91-01	SEE NOTE 1

DATE START #	EDG #	A-CAUSE	B-ROOT CAUSE	C-SIMILARITY	D-TYPE ROOT CAUSE ASSESSMENT PERFORMED	E-CORRECTIVE ACTION
03/23/90 1-90-134	1B	EDG TRIPPED WITH LOW PRESSURE JACKET WATER ANNUNCIATED	SENSOR CALIBRATION ERROR	YES	PER SPECIAL REPORT 1- 91-01	SEE NOTE 1
03/24/90 1-90-136	1B	OPERATOR STOPPED EDG AFTER RECEIVING HIGH JACKET WATER TEMP. TRIP ALARM WITH NORMAL TEMP.	SENSOR CALIBRATION ERROR	YES	PER SPECIAL REPORT 1- 91-01	SEE NOTE 1
03/30/90 1-90-148	1A	THE EDG TRIPPED DUE TO ONE TEMPERATURE SENSOR VENTING AND ANOTHER SENSOR LINE BEING DISCONNECTED FOR TESTING. THIS IS FURTHER DESCRIBED IN NUREG 1410.	SEE COLUMN A CAUSE FOR THIS START.	NO	NONE	REPLACED VENTING TEMPERATURE SENSOR.
04/12/90 2-90-055	2A	EDG DID NOT START	INITIALLY UNABLE TO IDENTIFY CAUSE. INADEQUATE CLEARANCE OF THE AIR START VALVES DETERMINED LATER.	YES	PER SPECIAL REPORT 1- 91-05	INCREASED AIR START VALVE CLEARANCE ONCE ROOT CAUSE WAS IDENTIFIED.
05/23/90 1-90-158	1B	EDG TRIPPED SHORTLY AFTER START	SENSOR CALIBRATION ERROR	YES	PER EVENT REPORT # 1- 90-07 & SPECIAL REPORT 1-90-04	SEE NOTE 1
06/23/90 1-90-157, 160, 161, 162, 164, 165	1B	EDG TRIPPED DURING TROUBLESHOOTING OF PREVIOUS FAILURE	SENSOR CALIBRATION ERROR	YES	PER EVENT REPORT # 1- 90-07 & DC 1-90-0258	SEE NOTE 1
06/19/90 1-90-187	1A	EDG DID NOT START	FUEL RACKS TAPED DURING PAINTING PROCESS	NO	PER DC 1-90-0276 & LER 1-90-14	DISCOVERED AND REMOVED TAPE AFTER NEXT START ATTEMPT FAILED
06/19/90 1-90-188	1A	EDG DID NOT START	FUEL RACKS TAPED DURING PAINTING PROCESS	YES	PER DC 1-90-0276 & LER 1-90-14	DISCOVERED AND REMOVED TAPE
07/05/90 1-90-181	1B	EDG DID NOT START	INITIALLY UNABLE TO IDENTIFY CAUSE. INADEQUATE CLEARANCE OF THE AIR START VALVES DETERMINED LATER.	YES	PER SPECIAL REPORT 1- 90-05	INCREASED AIR START VALVE CLEARANCE ONCE ROOT CAUSE WAS IDENTIFIED. DEVELOPED PROCEDURE TO FUNCTIONALLY CHECK
07/11/90 2-90-087	2A	EDG DID NOT START	INITIALLY UNABLE TO IDENTIFY CAUSE. INADEQUATE CLEARANCE OF THE AIR START VALVES DETERMINED LATER.	YES	PER EVENT REPORT 2- 90-05, DC 2-90-0067, & SPECIAL REPORT 1-90- 05	INCREASED AIR START VALVE CLEARANCES ON ALL 4 EDGs. DEVELOPED PROCEDURE TO FUNCTIONALLY CHECK ON PERIODIC BASIS.
07/19/90 1-90-184	1B	EDG WAS STOPPED DUE TO KVAR SWINGS AT FULL LOAD	PROBLEM WITH VOLTAGE REGULATOR, ONLY AT HIGH LOADS	NO	PER DC 1-90-0297 & SPECIAL REPORT 1-91- 01	REPLACED VOLTAGE REGULATOR

DATE START #	EDG #	A-CAUSE	B-ROOT CAUSE	C-SIMILARITY	D-TYPE ROOT CAUSE ASSESSMENT PERFORMED	E-CORRECTIVE ACTION
07/19/90 1-90-185	1B	TROUBLESHOOTING PREVIOUS FAILURE	PROBLEM WITH VOLTAGE REGULATOR, ONLY AT HIGH LOADS	YES	PER DC 1-90-0297 & SPECIAL REPORT 1-91- 01	REPLACED VOLTAGE REGULATOR
08/28/90 1-90-199	1A	EDG STOPPED BY OPERATOR DUE TO KVAR SPIKES	MALFUNCTION WITHIN THE VOLTAGE REGULATOR. TERMINALS WERE SHORTED DURING TROUBLESHOOTING WHICH CAUSED FURTHER DAMAGE INHIBITING DETERMINATION PROCESS	UNKNOWN	PER EVENT REPORT 1- 90-11, DC 1-90-0330, & SPECIAL REPORT 1-90- 06	REPLACED THE VOLTAGE REGULATOR
08/29/90 1-90-200	1A	SPIKES OCCURRED DURING TROUBLESHOOTING RUN	MALFUNCTION WITHIN THE VOLTAGE REGULATOR. TERMINALS WERE SHORTED DURING TROUBLESHOOTING WHICH CAUSED FURTHER DAMAGE INHIBITING DETERMINATION PROCESS	YES	PER EVENT REPORT 1- 90-11	REPLACED THE VOLTAGE REGULATOR

NOTE 1: THE EDG TRIPS DISCUSSED IN THIS NOTE WERE DETERMINED TO BE RELATED TO THE ROOT CAUSE OF THE EDG FAILURE WHICH GAVE RISE TO THE SAE ON 3/20/90. CORRECTIVE ACTIONS ASSOCIATED WITH THESE TRIPS ARE DISCUSSED IN NUREG-1410 AND THE EVENT REPORT 1-90-003. SENSORS REPLACED AND/OR RE-CALIBRATED USING THE REVISED CALIBRATION PROCEDURE DEVELOPED BY GPC BASED ON THE WYLE LABS TEST RESULTS AS DISCUSSED IN THE AFFIDAVIT OF LEWIS A. WARD IN RESPONSE TO QUESTIONS RAISED BY THE BOARD IN ITS JUNE 9, 1994 MEMORANDUM AND ORDER.

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. 80-424-OLA-3  
80-425-OLA-3

Re: License Amendment  
(Transfer to  
Southern Nuclear)

ASLSP NO. 93-671-OLA-5


AFFIDAVIT OF JOHN G. AUFDENKAMPE

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

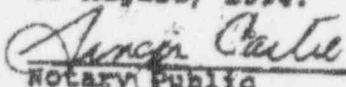
1. I am currently employed by Southern Company Services as Design Team Leader, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.c., 3.b. and 3.c..

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 8 day  
of August, 1994.

  
Notary Public  
My commission expires:  
MY COMMISSION EXPIRES DECEMBER 12, 1997

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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Re: License Amendment  
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ASLEP NO. 93-671-OLA-3

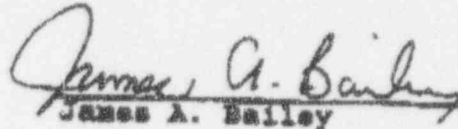
AFFIDAVIT OF JAMES A. BAILEY

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

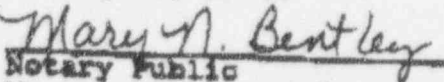
1. I am currently employed by Southern Nuclear Operating Company as Manager-Licensing, Vogtle Project.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.c. and 3.b.

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

Sworn to and subscribed  
before me this 8<sup>th</sup> day  
of August, 1994.

  
Notary Public  
My commission expires:  
May 6, 1995

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)
	:	
	:	ASLBP NO. 93-671-OLA-3

AFFIDAVIT OF GEORGE BOCKHOLD, JR.

I, George Bockhold, Jr., being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as General Manager, Nuclear Technical Support.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.a., 2.b., 2.c., 3.b., 3.c., and 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.

*J Bockhold*  
George Bockhold Jr.

Sworn to and subscribed  
before me this 8 day of  
August, 1994.

*Angie Carter*  
Notary Public  
My commission expires:  
MY COMMISSION EXPIRES JANUARY 10, 1997



August 8, 1994

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
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

AFFIDAVIT OF KENNETH S. BURR

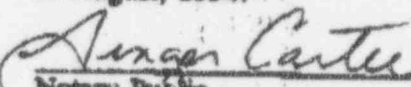
I, Kenneth S. Burr, being duly sworn, state as follows:

1. I am currently employed by the Southern Nuclear Operating Company, as Senior Project Engineer, Nuclear Maintenance and Support-Vogtle.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 1, 2.a., 2.b., 3.c., 4., 5., 7., 8., and 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.

  
Kenneth S. Burr

Sworn to and subscribed  
before me this 8 day  
of August, 1994.

  
Notary Public  
My commission expires:  
My Commission Expires December 15 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,  
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Docket Nos. 80-424-OLA-3  
80-425-OLA-3

Re: License Amendment  
(Transfer to  
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF CHARLES COURSEY

I, Charles Coursey, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Maintenance Superintendent, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 4. and 5.

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

  
Charles Coursey

Sworn to and subscribed  
before me this 8th day  
of August, 1994.

  
Notary Public

My commission expires

July 21, 1998

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1998



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

In the Matter of

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(Vogtle Electric Generating Plant,  
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50-425-OLA-3

Re: License Amendment  
(Transfer to  
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF MICHAEL D. DUNCAN

I, Michael D. Duncan, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Instrument & Controls Supervisor, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 3.a., 9. and 10.

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

  
Michael D. Duncan

Sworn to and subscribed  
before me this 1<sup>st</sup> day  
of August, 1994.

  
Notary Public

My commission expires:

July 21, 1998

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1998



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)

ASLEP NO. 93-671-OLA-3

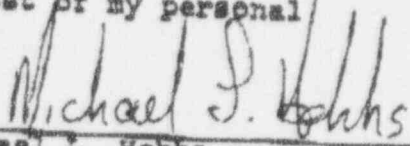
AFFIDAVIT OF MICHAEL L. HOBBS

I, Michael L. Hobbs, being duly sworn, state as follows:

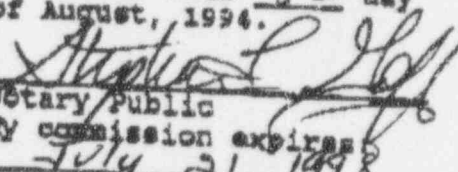
1. I am currently employed by Georgia Power Company as Instrument & Controls Superintendent, Vogtle Electric Generating Plant.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 3.a., 4., 5., 9. and 10.

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

  
Michael L. Hobbs

Sworn to and subscribed  
before me this 8th day  
of August, 1994.

  
Notary Public

My commission expires  
July 21, 1998

Notary Public, Pineland County, Georgia  
My Commission Expires July 21, 1998



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. 80-424-OLA-3  
50-425-OLA-3

Re: License Amendment  
(Transfer to  
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF J.B. HOLCOMB

I, J.B. Holcomb, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Mechanic, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 7 and 8.

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

*J.B. Holcomb*  
J.B. Holcomb  
HOLCOMB J.B.  
8/8/94

Sworn to and subscribed  
before me this 8th day  
of August, 1994.

*Stephen L. Yaff*  
Notary Public  
My commission expires:  
July 21, 1998

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1998



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)

ASLHP NO. 93-671-OLA-3

AFFIDAVIT OF MICHAEL W. HORTON

I, Michael W. Horton, being duly sworn, state as follows:

1. I am currently employed by Southern Nuclear Operating Company as Project Manager - Nuclear Technical Services.

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogator Nos. 2.a., 2.b. and 3.c.

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

Michael W. Horton  
Michael W. Horton

Sworn to and subscribed  
before me this 8 day of  
August, 1994.

James Carter  
Notary Public

My commission expires:

~~12-31-1997~~

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)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF W.F. KITCHENS

I, W.F. Kitchens, being duly sworn, state as follows:

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

2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.a., 2.b., 2.c., 3.a., 3.b., and 3.c.

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

W.F. Kitchens 8/8/94  
W.F. Kitchens

Sworn to and subscribed  
before me this 8<sup>th</sup> day  
of August, 1994.

Stephen L. Left  
Notary Public

My commission expires  
July 21, 1994

Notary Public, Pickens County, Georgia  
My Commission Expires July 21, 1994





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)

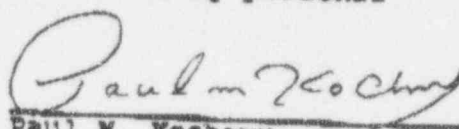
ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF PAUL M. KOCHERY

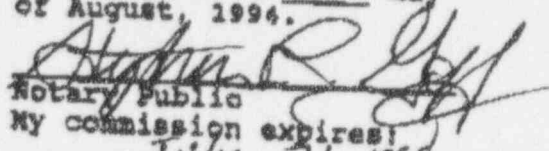
I, Paul M. Kochery, being duly sworn, state as follows:

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 Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.a., 2.b., 3.c., 4., 5., 6., and 7.

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

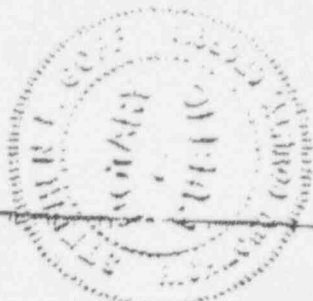
Sworn to and subscribed  
before me this 8th day  
of August, 1994.

  
Notary Public

My commission expires:

July 21, 1998

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1998





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)

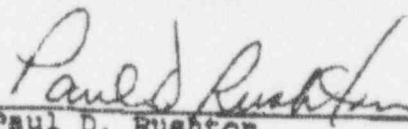
ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF PAUL D. RUSHTON

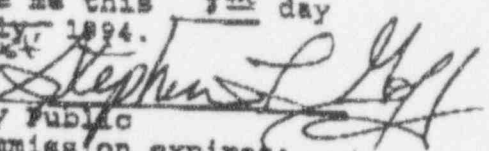
I, Paul D. Rushton, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Shift Superintendent, Vogtle Electric Generating Plant.
2. I am duly authorized to verify Georgia Power Company's Response to Intervenor's Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 2.c. and 3.b.

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 D. Rushton

Sworn to and subscribed  
before me this 8<sup>th</sup> day  
of July, 1994.

August  
  
Notary Public  
My commission expires:

July 26, 1998  
Notary Public, Pickens County, Georgia  
My Commission Expires July 21, 1998



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY, et al.

Electric Generating Plant,  
(Units 1 and 2)

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

Re: License Amendment  
(Transfer to  
Southern Nuclear)

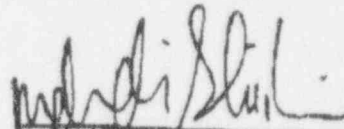
ASLEP NO. 93-671-OLA-3

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 Seventh Request for Interrogatories, specifically the response to Interrogatory No. 13.

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 8th day  
of August 1994.

  
Notary Public

My commission expires July 21, 1996

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1996



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)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF KENNETH C. STOKES

I, Kenneth C. Stokes, 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 Seventh Request for Interrogatories, specifically the responses to Interrogatory Nos. 1., 2.a., 2.b., 3.c., 4., 5., 7., 8., and 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.

Kenneth C. Stokes  
Kenneth C. Stokes

Sworn to and subscribed  
before me this 8th day  
of August, 1994

Notary Public

My commission expires:

July 21, 1995

Notary Public, Richmond County, Georgia  
My Commission Expires July 21, 1995





DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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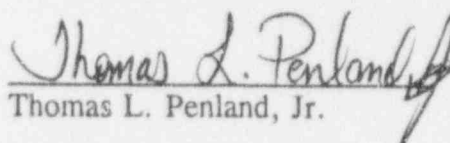
Before the Atomic Safety and Licensing Board

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

CERTIFICATE OF SERVICE

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

  
Thomas L. Penland, Jr.

TROUTMAN SANDERS  
Suite 5200  
600 Peachtree Street, N.E.  
Atlanta, GA 30308-2216

(404) 885-3471

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,  
Units 1 and 2)

\* Re: License Amendment  
\* (Transfer to Southern  
\* Nuclear)  
\*

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

SERVICE LIST

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

Stewart D. Ebner  
Regional Administrator  
USNRC, Region II  
101 Marietta Street, NW  
Suite 2900  
Atlanta, Georgia 30303

Office of the Secretary  
U.S. Nuclear Regulatory  
Commission

Washington, D. C. 20555  
ATTN: Docketing and  
Services Branch

Administrative Judge  
James H. Carpenter  
Atomic Safety and Licensing  
Board  
933 Green Point Drive  
Oyster Point  
Sunset Beach, NC 28468

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

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

Director,  
Environmental Protection  
Division  
Department of Natural  
Resources  
205 Butler Street, S.E.  
Suite 1252  
Atlanta, Georgia 30334

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