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50-424/425-OLA-3

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JOHN LAMBERSKI

August 17, 1994

OFFICE OF SECRETARY
DOCKETING & SERVICE
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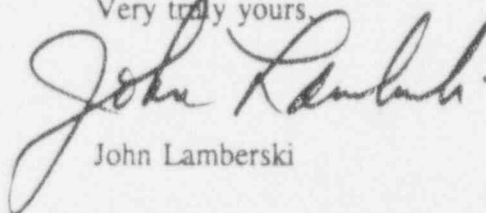
Administrative Judge Peter B. Bloch, Chairman
Administrative Judge James H. Carpenter
Administrative Judge Thomas D. Murphy
Atomic Safety and Licensing Board (Georgia Power)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Vogtle Electric Generating Plant, Units 1 and 2 License Amendment (Transfer to Southern Nuclear) ASLBP No. 93-671-01-OLA-3.

Dear Sirs:

Yesterday, I provided to you Georgia Power Company's Response to Intervenor's Motion to Compel GPC to Produce Bill Shipman (August 16, 1994). Two letters should have been attached to that filing but were inadvertently omitted. Those two letters, one from M. Kohn to E. Blake, dated July 12, 1994, and another from J. Lamberski to M. Kohn, dated July 14, 1994, are attached to this letter. I apologize for any inconvenience this may have caused.

Very truly yours,


John Lamberski

cc: Service List

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• ADMITTED IN PA
• ADMITTED IN NY

July 12, 1994

Via Facsimile

Ernest L. Blake, Jr., Esq.
David R. Lewis, Esq.
Shaw, Pittman, Pitts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

Re: Vogtle Electric Generating Plant, Units 1 & 2
License Amendment (Transfer to Southern Nuclear)
Docket Nos. 50-424-OLA-3; 50-425-OLA-3

Dear Ernest:

Intervenor requests that the following individuals be made available for deposition as follows:

- | | | | |
|----|-----------|------|-------------------------|
| 1. | Miller | 7/18 | 10:00 a.m. |
| 2. | Lisenby | 7/18 | 12:30 p.m. |
| 3. | Ajluni | 7/18 | 2:00 p.m. |
| 4. | *Bailey | 7/19 | 10:00 a.m. ¹ |
| 5. | Ward | 7/20 | 10:00 a.m. |
| 6. | *Rushton | 7/20 | 10:00 p.m. |
| 7. | Kitchens | 7/20 | 2:00 p.m. |
| 8. | *Bockhold | 7/21 | 10:00 a.m. |

¹ "*" indicates that the same date and time appears as was proposed in an earlier schedule for oral examination transmitted to Intervenor by counsel to Licensee.

9. Shipman 7/22 1:30 p.m.²
10. McCoy 7/25 10:00 a.m.
11. *McDonald 7/26 10:00 a.m.
12. *Hairston 7/27 10:00 a.m.
13. ~~Payley~~ 7/28 10:00 ~~a.m.~~
14. *Dahlberg 7/28 3:00 p.m.

The above schedule represents Intervenor's best effort to attempt to work with an earlier proposed schedule each party has previously

Sincerely,

MDK

Michael D. Kohn

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² If Licensee believes that Mr. Shipman will not be available on this date due to health considerations, Intervenor requests that an affidavit be submitted stating Mr. Shipman's health status (including any reason to believe his health would improve at a later date and why a delay in taking his deposition is necessary). Intervenor also would like to know whether Licensee anticipates whether Mr. Shipman will be available when the hearing in this matter convenes or whether the parties should consider taking his testimony out of time.

TROUTMAN SANDERS
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JOHN LAMBERSKI

DIRECT 404 885 3360

July 14, 1994

VIA FACSIMILE

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

Re: Georgia Power Company (Vogtle Electric Generating Plant, Units 1 and 2)
NRC Docket Nos. 50-424-OLA-3, 50-425-OLA-3; License Amendment for
Transfer to Southern Nuclear Operating Company

Dear Michael:

Ernie Blake and I telephoned you yesterday to discuss the deposition schedule. We left a message for you to call us but did not receive a call back. The following is our latest schedule for depositions for the weeks of July 18 and July 25:

July 18: 10:00 a.m. - Miller; 12:30 p.m. - Lisenby; 2:00 p.m. - Ajluni¹
July 19: 10:00 a.m. - Bailey; 1:00 p.m. Ward
July 20: 10:00 a.m. - Rushton; 2:00 p.m. Dixon
July 21: 10:00 a.m. - Bockhold
July 22: 10:00 a.m. - Mosbaugh

July 25: 11:00 a.m. - Farley; 2:00 p.m. - McDonald²
July 26: 10:00 a.m. - McCoy
July 27: 10:00 a.m. - Hairston
July 28: 3:00 p.m. - Dahlberg
July 29: 2:00 p.m. - STATUS CONFERENCE³

¹ I have not been able to confirm this with Ajluni, who is on vacation.

² Mr. McDonald will be returning from Pensacola this day and will confirm, or propose a change to, the start time for this deposition within the next day or two.

³ Ernie informed the Board yesterday of the parties' desire to shift the status conference from the 22nd to the 29th; the Licensing Board will determine the time and location for the

TROUTMAN SANDERS
ATTORNEYS AT LAW
A SOUTHERN COMPANY INCLUDING THE SOUTHERN COMPANY

Michael D. Kohn, Esquire

July 14, 1994

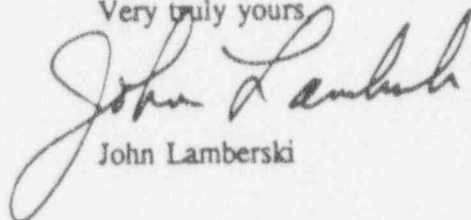
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All depositions will take place in the offices of Troutman Sanders, with the exception of Mr. Dahlberg's deposition which will take place in the Southern Company offices. Intervenor is responsible to arrange for a court reporter for all depositions except for Mr. Mosbaugh.

In response to your request to depose Mr. Shipman, As I told you on July 12, it is my understanding from discussions I have had with Richard Hendrix, Mr. Shipman's attorney, that Mr. Shipman is meeting with his surgeons in Houston on July 15 and 18 to determine whether he will undergo surgery. We will not know whether Mr. Shipman will be able to attend any deposition until he returns from Houston. This will be July 19, assuming he does not undergo surgery. Your July 13 letter to the Board incorrectly reports these dates. You may want to submit a letter to the Board correcting your July 13 letter.

We have also discussed a possible deposition date for Mr. Kitchens. To confirm, if you would like to depose Mr. Kitchens on July 20, you must do so in the vicinity of Plant Vogtle since Mr. Kitchens must remain close to the plant that day. You have indicated that you would like to depose him at a later date. August 2, 1994 to depose Mr. Kitchens in Atlanta remains acceptable, but you should let me know by July 22nd if you would like to depose him then.

Very truly yours



John Lamberski

cc: Charles A. Barth, Esq.

status conference.