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RELATED CORRESPONDENCE

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USNRC

August 17, 1994

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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-3

Re: License Amendment
(transfer to Southern Nuclear)

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

INTERVENOR'S DOCUMENT REQUEST TO GEORGIA POWER COMPANY

I. INTRODUCTION

Pursuant to 10. C.F.R. §2.740b, Allen Mosbaugh hereby requests that Georgia Power Company (hereinafter referred to as "GPC") respond to the following document request by producing any documents requested herein that have not previously been produced.

II. INSTRUCTIONS

A. If you claim that any information which is required to be provided by you in your response to this document request is privileged or immune from discovery:

1. Identify the such information which you claim is privileged in the response;

2. If the information is a document or oral communication, identify the document's title or the oral

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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.

B. In each case where you are asked to identify or to state the identify of 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 under which 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.

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 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. DOCUMENT REQUEST

1. Identify and produce all documents used in the creation of Georgia Power Company's response to the Notice of Violation (NOV) dated July 31, 1994.

2. Identify and produce all documents used in the creation of the response to the NRC Demand for Information Regarding C. Kenneth McCoy, dated August 1, 1994.

3. Identify and produce all documents used in the creation of the response to the NRC Demand for Information Regarding George Bockhold, Jr., dated July 31, 1994.

4. Identify and produce all documents used in the creation of the response to the NRC Demand for Information Regarding

Thomas V. Greene, Georgie R. Frederick, Harry Majors, and Michael W. Horton, dated July 31, 1994.

5. Identify and produce all documents, directly or indirectly related to the responses to the NOV and Demands for Information identified in 1-4 above.

Respectfully submitted,

Mary Jane Wilmoth

Mary Jane Wilmoth
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Attorney for Intervenor

DATED: August 17, 1994

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CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Document Request from Georgia Power Company has been served this 17th day of August 1994, by first class mail upon the persons listed in the attached Service List.

By:

Mary Jane Wilmoth
Mary Jane Wilmoth
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SERVICE LIST

Administrative Judge
Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Thomas D. Murphy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
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Office of the Secretary
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Washington, D.C. 20555

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Administrative Judge
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