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RELATED CORRESPONDENCE

DOCKETED

Dated: September 20, 1994

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION SEP 21 PM 48
 ATOMIC SAFETY AND LICENSING BOARD

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-3Re: License Amendment
 (transfer to Southern Nuclear)

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

INTERVENOR'S RESPONSE TO LICENSEE'S
REQUEST FOR STIPULATIONS DATED FEBRUARY 28, 1994

I. INTRODUCTION

At the August 12, 1994 status conference the Licensing Board instructed the parties that when making request for stipulations regarding tape transcripts the party's making the request is to certify that the requested tape transcript stipulations are relevant to that party's case. Tr. 597, Tr. 601. Intervenor requested that Licensee certify that the requested tape transcript stipulations are relevant to the Licensee's case. See letter dated August 15, 1994 from M. Wilmoth to J. Lamberski. Intervenor never received a response to this request. Therefore, Intervenor objects, on this basis, to responding to the request for stipulations on the tape transcripts included in Licensee's request which were not exhibits to the OI Report. Intervenor takes this position because it would be a waste of time and resources to stipulate to tape transcripts which the Licensee no longer believes are relevant to its case and does not plan to introduce into evidence.

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Intervenor, however, is willing to respond to the request for stipulations in regard to the portions of the tape transcripts in the requests which were exhibits to the OI Report. Intervenor believes that the fact these tape transcripts were used in the OI Report makes them relevant to this proceeding. These requests are the portions of transcripts from Tape Nos. 42, 184, 186, 187, 253, 258, and 267. Intervenor will also respond to the NRC tape recording, IIT #257.

II. TAPE TRANSCRIPT STIPULATIONS

Intervenor agrees to stipulate that the above listed tape transcripts portions are true and accurate with the exception of the following:

Tape 42

- p. 1, ln 4: The (inaudible) should read dewpoint.¹
- p. 19, ln 17: of problem we had.
- p. 20, ln 8: The words "that are" should be deleted.
- p. 22, ln 24: Not on, that's right the B machine that's right tripped before
- p. 27, ln 11: any data then, past the 20th?
- p. 28, ln 12-25: Please note that Paul Kochery is the speaker on these lines.
- p. 29, ln 1: The (inaudible) should read statement you know.
- p. 29, ln 5: And I'll get some copies.
- p. 29, ln 16: The (inaudible) should read it went up.

¹ The underline is to indicate words which are to be added to the text of the transcript.

p. 33, ln 23: The (inaudible) should read as it was before correction I heard of.

p. 33, ln 24: The (inaudible) should read different.

p. 34, ln 2-3: Between lines 2-3 should be inserted the following--Kochery: Yea, the remaining. Line 3 should read:
ALM: Okay, all right, maybe I'll get with him.

Tape 184

No corrections.

Tape 186 (page 34, line 23 through page 47, line 25)

p. 1, ln 11: He won't sign the LER until we got an audit laying on his desk.

p. 1, ln 13: The Speaker is Odom and it is not a continuation of Fredericks from line 11.

Tape 187 (page 18, line 18 through page 75, line 5)

p. 1, ln 12: The (inaudible) should read George Fredericks.

p. 1, ln 19: The (inaudible) should read any words.

p. 1, lns 14, 16, and 18 the Speaker is Tynan.

p. 1, ln 17: The (inaudible) should read Mr. Hairston writes that last sentence.

p. 1, ln 20: The (inaudible) should read Fredericks said.

p. 1, ln 22: The (inaudible) should read yeah.

p. 1, ln 28: I think it's wrong, but I certainly think Mr. Hairston knows

p. 6, ln 19: The (inaudible) should read Okay, all right.

p. 6, ln 31: The (inaudible) should read factored in.

p. 14, ln 8: The Speaker is Odom and not Webb.

p. 14, ln 14: The LER's then changed? I haven't heard that the cover

p. 15, ln 10: That's how we got to 19 in Atlanta.

p. 16, ln 8: The (inaudible) should read getting sheets.

p. 17, ln 31: The (inaudible) should read our practices.

p. 22, ln 22-26: submittal of the LER. It also appears that confusion about the specific point at which the test program exist. And they start that paragraph out by saying no specific cause for the error in the LER 18 starts was identified.

p. 22, ln 31: The (inaudible) should read is consistent.

p. 23, ln 31: The (inaudible) should read them.

p. 24, ln 3: How about changing the word to difference, and let me find out.

p. 24, ln 25: that word, though if you would.

p. 25, ln 4: PRB members are getting tired of this particular LER. We

p. 25, ln 30-31: We argued and argued over it until this time of day on April 19th finally corporate said "We believe what we said on April 9 is okay, we are going to put that in the LER."

p. 26, ln 7: Yes, sure, definitely, the information was all available, okay.

Tape 253 (page 5, line 3 through page 21, line 21)

Insert 1, ln 4: and who approved them?

Insert 1, ln 11: three of us worked on it at the time. I might have put the

Insert 1, ln 12: bullets down and let Ken Burr to make sure

Tape 258 (page 22, line 15 through page 39, line 12)

p. 1, ln 14: The (inaudible) should read draft.

p. 8, ln 13: different things going on that I'll work to explain with George.

p. 8, ln 38: The second (inaudible) should read had a mistake in it.

Insert 1, ln 14: The (inaudible) should read when we wrote the revision

Insert 1, ln 17: The (inaudible) should read He had done his audit. We completed the audit.

p. 9, ln 10: Which meant we changed the type of starts we were counting (inaudible) successful to valid and

p. 9, ln 17: The Speaker is Aufdenkampe. The (inaudible) should read by the same time frame.

p. 9, ln 19: The Speaker is Bockhold.

p. 9, ln 26: The (inaudible) should read Tom took.

p. 9, ln 27-28: or correct the first LER. One was valid starts (pause) there were so many revisions on it.

p. 10, ln 11: is that -- what they focused on and come to the

p. 10, ln 32: The (inaudible) should read reactionary.

Tape 267 (Side B, page 41, line 9 through page 47, line 9)

Intervenor request that page 40 also be attached to put this passage into the proper context.

p. 1, ln 4: The (inaudible) should read get our butts kicked

p. 1, ln 9: something they know is wrong. If we, we lie to them...

p. 2, ln 27: Where it tripped.

p. 2, ln 36: We missed those and that's what cut us down to

14

IIT Tape #257

No corrections.

Respectfully submitted,

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DATED: September 20, 1994

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August 23, 1994

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION '94 SEP 21 P4:48
 ATOMIC SAFETY AND LICENSING BOARD

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GEORGIA POWER COMPANY)
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 Plant, Unit 1 and Unit 2))Docket
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 50-425-OLA-3Re: License Amendment
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ASLEP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Response to Licensee's Request for Stipulations Dated February 28, 1994 has been served this 20th day of September 1994, by facsimile persons listed in the attached Service List, with the exception that it was served by first class mail as indicated by "*".

By:

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

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