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BEFORE THE
UNITED STATES DEPARTMENT OF LABOR

ALLEN L. MOSBAUGH,
Complainant,
vs.
GEORGIA POWER COMPANY,
Respondent.

VOLUME I

Case Nos. 91-ERA-01
91-ERA-11

Hearing Room A, Suite 2400,
101 Marietta Tower,
101 Marietta Street, N.W.,
Atlanta, Georgia

Tuesday, March 10, 1992

The above-entitled matter came on for hearing,
pursuant to Notice, at 9:30 a.m.

BEFORE:

HON. ROBERT M. GLENNON, Administrative Law Judge

APPEARANCES:

On behalf of the Complainant:

MICHAEL D. KOHN, Attorney,
STEPHEN M. KOHN, Attorney,
Kohn, Kohn & Colapinto,
517 Florida Avenue, N.W.,
Washington, D.C. 20001

SANDRA MICHAELS, Attorney,
142 Mitchell Street, S.W.,
Suite 300,
Atlanta, Georgia 30303

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424-01A-3 Official Exh. No. 26

In the matter of GA. Power Units 1+2

Staff IDENTIFIED

Applicant ☒ RECEIVED ☒

Intervenor REJECTED

Cont'g Off'r

Contractor DATE 1-11-95

Other Witness Mosbaugh

Reporter C. Riner

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APPEARANCES (Continued):

On behalf of the Respondent:

JAMES E. JOINER, Attorney,
JESSE P. SCHAUDIES, Jr., Attorney,
Troutman, Sanders, Lockerman & Ashmore,
1400 Candler Building,
Atlanta, Georgia 30303-1810
Assisted by C. K. McCoy

On behalf of the Nuclear Regulatory Commission:

DARYL SHAPIRO, Attorney,
Nuclear Regulatory Commission,
Rockville, Maryland 20555

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I N D E XWITNESSES:

	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Franklin Timmons	10	--	--	--
Allen L. Mosbaugh	68	--	--	--

EXHIBITS:IDENTIFIED RECEIVED

Complainant's:

2 - Mosbaugh resume'	Premarked	72
3 - '84 Performance Review	"	92
4 - '85 Performance Review	"	92
5 - '86 Performance Review	"	93
6 - '87 Performance Review	"	94
7 - '88 Performance Review	"	94
8 - '89 Performance Review	"	94
9 - Letter of Appreciation	"	97
10 - "Vogtle Voice"	"	97
11 - Executive Appraisal	"	99
12 - Organizational Chart	"	90
13 - Vogtle Technical Specification	"	106
14 - Memo 9/15/89	"	126
15 - Letter to NRC	"	145
16 - NRC OI Report Excerpt	"	--
18 - Handwritten notes	"	154/155
19 - Handwritten notes	"	165
20 - Portion of Survey	"	Rejected

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1 Q. And who would Mr. McCoy report to?

2 A. He reported to George Hairston who was senior vice
3 president nuclear if I may use that word in a general sense,
4 and Mr. Hairston had three vice presidents reporting to him
5 because there was a vice president for each of the nuclear
6 facilities -- okay -- so Hatch would have a vice president,
7 Vogtle would have a vice president, and Farley, Plant Farley
8 in Alabama would have a vice president, and all three of
9 those people would report to George Hairston.

10 Q. Now, was Hairston, did he work for Georgia Power,
11 or was he working for another organization, or both?

12 A. I guess he worked for Georgia Power with respect to
13 his Vogtle and Hatch responsibilities.

14 Q. And who else did he work for?

15 A. Well, I guess he would work for Alabama with
16 respect to his Alabama responsibilities.

17 Q. And just to clarify the record, as I understand it
18 Hairston would have responsibilities not just for the Vogtle
19 or Georgia Power system, but for other plants that were out
20 in Alabama? There are I think two units in Alabama?

21 A. There are two Farley units, so under this
22 arrangement Mr. Hairston was responsible for three sites
23 containing six nuclear power plants, nuclear units.

24 Q. And four of them are owned by Georgia Power, and
25 two are owned by Alabama Power?

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1 A. That's correct.

2 Q. And who would Mr. Hairston report to?

3 A. Mr. Hairston reported to executive vice president
4 Pat McDonald.

5 Q. And what were his responsibilities?

6 A. He had complete responsibilities for all those
7 nuclear power plants.

8 Q. That would be for something known as the Southern
9 System's nuclear power plants?

10 A. Yeah, I think general terms, yes.

11 Q. Okay. And just briefly what is the Southern
12 System?

13 A. The Southern Electric System is a utility holding
14 company that owns five or six subcompanies -- the Georgia
15 Power Company, the Alabama Power Company, Savannah Electric &
16 Gas, Gulf Power, they have an engineering branch which is
17 called SCS, and so it's a holding company and it has all
18 these utilities and some services organizations under it.

19 Q. And for Plant Vogtle who would Mr. McDonald report
20 to?

21 A. For Plant Vogtle I guess and Plant Hatch, for
22 Georgia Power he would report to Mr. Dahlberg, president of
23 Georgia Power Company.

24 Q. And did he have anyone else that he would report
25 to?

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1 A. Nobody else that he would report to that I know of.

2 Q. For Georgia Power plants. What about for the other
3 Southern Company operations?

4 A. I guess he would report to an executive in Alabama
5 Power for those.

6 Q. And you mentioned Mr. Dahlberg. What's his
7 position?

8 A. He's the president of Georgia Power Company.

9 Q. In what city is McCoy, Hairston and McDonald --
10 what city are they located in?

11 A. In Birmingham.

12 Q. Alabama?

13 A. Yes.

14 Q. And where would Mr. Dahlberg be stationed?

15 A. He's in Atlanta, Georgia here.

16 Q. And when did you become the acting general manager
17 plant support?

18 A. I believe that was made effective in March of 1989.

19 Q. Okay. I'd now like to call your attention to what
20 has been premarked as Complainant's Exhibit 3, your 1984
21 performance review.

22 For the record I'd like to move in C)-12, the
23 organizational chart.

24 MR. JOINER: No objection.

25 JUDGE GLENNON: It is received into evidence.