

RELATED CORRESPONDENCE

DOCKETED
USNRC

February 28, 1995

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

'95 MAR -2 P12:04

Before Administrative Judges:
Peter B. Bloch, Chair
Dr. James H. Carpenter
Thomas D. Murphy

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)

GEORGIA POWER COMPANY)
et al.,)

(Vogtle Electric Generating)
Plant, Unit 1 and Unit 2))

Docket Nos. 50-424-OLA-2
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, Intervenor in the above entitled proceeding, hereby requests that Georgia Power Company (hereinafter referred to as "GPC") respond to the following document request by identifying all documents requested herein and by producing all documents requested herein that have not previously been produced. Intervenor requests a response within ten (10) days or at another mutually agreeable time.

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 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 and/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 (or Southern Nuclear), 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, phone logs, 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, depositions and all other memorials of any conversations, meetings, and conferences by telephone or otherwise, including personal notes, 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, including those directly involved in the responses to the Demand for information.

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.

E. As used herein, the term "NOV" shall mean the Notice of Violation issued on May 9, 1994; the Demand for Information issued to the following individuals: C.K. McCoy, George Bockhold, Jr., Thomas V. Greene, Georgie R. Frederick, Harry Majors, and Michael W. Horton on May 9, 1994; Georgia Power's July 31, 1994 Response to the NOV; Georgia Power's Supplemental Response to the NOV, dated February 1, 1995; the responses of each individual listed above in this paragraph to the individual

Demands for information; the Supplemental Response of George Bockhold, Jr., date February 1, 1995; the NRC's Modified Notice of Violation issued February 13, 1995; and the NRC's Responses to demand for information for each of the individuals listed above in this paragraph.

F. As used herein, the term "selected individual" shall mean the following individuals to whom a Demand for Information was issued: C.K. McCoy, George Bockhold, Jr., Thomas V. Greene, Georgie R. Frederick, Harry Majors, and Michael W. Horton.

G. As used herein, the term "recorded" shall mean any process by which a record is made of a meeting, event, conversation or correspondence, including but not limited to audio tape, minutes, court reporter notes, video tape, phone logs, hand written notes and any transcriptions thereof.

IV. DOCUMENT REQUEST

1. Identify and produce all documents directly or indirectly related to the NOV.

2. Identify and produce all correspondence between Georgia Power and any person directly or indirectly related to the NOV.

3. Identify and produce all correspondence between Georgia Power and the NRC directly or indirectly related to the NOV.

4. Identify and produce all correspondence between Georgia Power and/or its council and the selected individuals and/or their individual council, directly or indirectly related to the NOV.

5. Identify and produce all correspondence between the selected individuals and/or their individual counsel and the NRC directly or indirectly related to the NOV.

6. Identify and produce all documents created by non Georgia Power employees directly or indirectly related to the NOV.

7. Identify and produce all documents directly or indirectly related to the any settlement and settlement negotiations between Georgia Power, its counsel and the NRC regarding the NOV.

8. Identify and produce all documents directly and indirectly related to the any settlement and settlement negotiations between the selected individuals, their individual counsel and the NRC regarding the NOV.

9. Identify and produce all hand written notes directly or indirectly related to the NOV and Demands for information.

10. Identify any discussions or meetings between Georgia Power, its counsel and the NRC, directly or indirectly related to the NOV that were recorded.

11. Identify any discussions or meetings, between the selected individuals and the NRC, directly or indirectly related to the NOV that were recorded.

12. Identify the manner in which the discussions or meetings identified in numbers 10 and 11 above were recorded and the person(s) or company who recorded them.

13. Identify and produce the recordings and/or transcripts of the discussions or meetings identified in numbers 10 and 11 above.

14. Identify and produce any notes, minutes, and/or phone logs of the discussions or meetings identified in numbers 10 and 11 above.

15. Identify and produce all documents used in the creation of Georgia Power Company's February 1, 1995 Supplement to Georgia Power Company's Response to the Notice of Violation (NOV) dated July 31, 1994.

16. Identify and produce all documents used in the creation of the February 1, 1995 letter from Mr. George Bockhold, Jr. to Mr. James Lieberman that supplements his August 5, 1994 Response to the NRC Demand for Information Regarding George Bockhold, Jr. (EA 94-037).

17. Identify and produce all documents used or created as a result of the meetings between George Bockhold, Jr. and the Senior Vice President of Georgia Power and his immediate supervisor at Southern Nuclear, that were generally identified in Mr. Bockhold's February 1, 1995 letter.

18. Identify all persons whom attended each of the meetings identified in response to number 17 above.

19. Identify the immediate supervisors, at both Georgia Power and Southern Nuclear, of George Bockhold, Jr.

20. Produce the personnel file of George Bockhold, Jr. from May 1, 1994 to present.

21. Identify and produce all documents upon which Georgia Power relied when coming to the understanding that it's July 31, 1994 response to the NOV had not persuaded the Staff of the appropriateness of the actions of George Bockhold.

22. Identify and produce any documents used in response to or generated as a result of the NRC's letter regarding the individual responses to the NRC's Demand for Information Regarding Thomas V. Greene, Georgie R. Frederick, Harry Majors, and Michael W. Horton, issued February 13, 1995.

23. Identify and produce any documents used in response to or generated as a result of the NRC's letter regarding the Response to the Demand for Information Regarding Kenneth McCoy, issued February 13, 1995.

24. Identify and produce any documents used in response to or generated as a result of the NRC's letter regarding the response to the Demand for Information Regarding George Bockhold, Jr., issued February 13, 1995.

25. Identify and produce any documents used in response to or generated as a result of the NRC's Modified Notice of Violation and Proposed Imposition of Civil Penalties, issued February 13, 1995, by Georgia Power Personnel.

26. Identify and produce any depositions relied upon in creating Georgia Power's responses to the NOV or Demand for Information.

27. Identify and produce any depositions relied upon in creating the responses of the selected individuals to the NOV or Demand for Information.

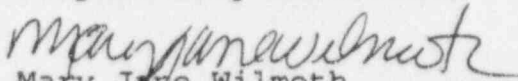
28. The information and documents that are to be identified and/or produced in numbers 1-27 above, should include but are not limited to all documents, including handwritten personal notes, used in response to or created as a result of numbers 1-27 above by the following individuals:

- a. Thomas V. Greene
- b. Georgie R. Frederick
- c. Harry Majors
- d. Michael W. Horton
- e. C. K. McCoy
- f. George Bockhold
- g. J. Beasley, Jr.
- h. M. Sheibani
- i. H. A. Franklin
- j. W. G. Hairston, III
- k. J. D. Woodard
- l. L. B. Long
- m. any other individual who was directly or indirectly involved with the above items.

29. Identify and produce all documents created since responded to the previous request for documents by Intervenor.

30. Identify and produce all documents that may be responsive to any of the document requests set out in Intervenor's Document Request to NRC Staff, dated February 28, 1995.

Respectfully submitted,



Mary Jane Wilmoth

Stephen M. Kohn

KOHN, KOHN & COLAPINTO, P.C.

517 Florida Ave., N.W.

Washington, D.C. 20001-1850

(202) 234-4663

Attorneys for Intervenor

DATED: February 28, 1995

C:\FILES\301\DOC2.GPC

DOCKETED
February 28, 1995

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

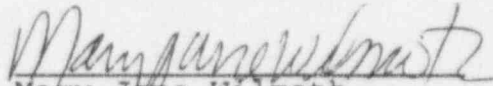
'95 MAR -2 P12:04

In the Matter of)	
GEORGIA POWER COMPANY)	Docket Nos. 50-424-OLA-3
<u>et al.</u> ,)	50-425-OLA-3
(Vogtle Electric Generating)	Re: License Amendment
Plant, Unit 1 and Unit 2))	(transfer to Southern Nuclear)
)	ASLBP No. 93-671-01-OLA-3

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that the following documents entitled
Intervenor's Document Request to NRC Staff, Intervenor's Document
Request to Georgia Power Company, Intervenor's Document Request
to C.K. McCoy, Intervenor's Document Request to George Bockhold,
Jr., Intervenor's Document Request to Thomas V. Greene,
Intervenor's Document Request to Georgie R. Frederick,
Intervenor's Document Request to Harry Majors, and Intervenor's
Document Request to Michael W. Horton have been served this
February 28, 1995, by first class mail on the persons listed in
the attached service list.


Mary Jane Wilmoth
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
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-3

Re: License Amendment
(transfer to Southern Nuclear)

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

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
Washington, D.C. 20555

John Lamberski, Esq.
Troutman Sanders
Suite 5200
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216

Office of the Secretary
Attn: Docketing and Service
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Administrative Judge
James H. Carpenter
933 Green Point Drive
Oyster Point
Sunset Beach, NC 28468

Charles A. Barth, Esq.
Office of General Counsel
U.S. N.R.C.
Washington, D.C. 20555

Ernest L. Blake, Jr.
David R. Lewis
SHAW, PITTMAN, POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037