

RELATED CORRESPONDENCE

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February 28, 1995

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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 THOMAS V. GREENE

I. INTRODUCTION

Pursuant to 10. C.F.R. §2.740b, Allen Mosbaugh, Intervenor in the above entitled proceeding, hereby requests that Thomas V. Greene 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", 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.

H. As used herein, the term "you" and/or "your" shall mean Thomas V. Greene.

IV. DOCUMENT REQUEST

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

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

3. Identify and produce all correspondence between you 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 you and/or your individual council, directly or indirectly related to the NOV.

5. Identify and produce all correspondence between the you and/or your individual counsel and the NRC directly or indirectly related to the NOV.

6. Identify and produce all documents directly and indirectly related to the any settlement and settlement negotiations between the you, your individual counsel and the NRC regarding the NOV.

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

8. Identify any discussions or meetings, between the you and the NRC, directly or indirectly related to the NOV that were recorded.

9. Identify the manner in which the discussions or meetings identified in number 8 above were recorded and the person(s) or company who recorded them.

10. Identify and produce the recordings and/or transcripts of the discussions or meetings identified in number 8 above.

11. Identify and produce any notes, minutes, and/or phone logs of the discussions or meetings identified in number 8 above.

12. Identify and produce all documents in your possession 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.

13. Identify and produce all documents in your possession 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).

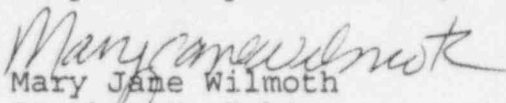
14. Identify and produce all documents in your possession upon which Georgia Power relied when coming to the understanding that it's July 31, 1994 response to the NOV had not persuaded the Staff of the appropriateness of the actions of George Bockhold.

15. 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.

16. 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.

17. Identify and produce any depositions relied upon in creating your response the Demand for Information.

Respectfully submitted,


Mary Jane Wilmoth
Stephen M. Kohn
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
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(202) 234-4663

Attorneys for Intervenor

DATED: February 28, 1995

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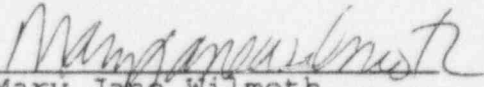
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '95 MAR -2 P12:04
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	OFFICE OF SECRETARY
)	DOCKETING & SERVICE
GEORGIA POWER COMPANY)	BRANCH
<u>et al.</u>)	Docket Nos. 50-424-OLA-3
)	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

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.


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

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(Vogtle Electric Generating)	Re: License Amendment
Plant, Unit 1 and Unit 2))	(transfer to Southern Nuclear)
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SERVICE LIST

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