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

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Before Administrative Judges:
Peter B. Bloch, Chair
Dr. James H. Carpenter
Thomas D. MurphyOFFICE 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-3
50-425-OLA-3Re: License Amendment
(transfer to Southern Nuclear)

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

INTERVENOR'S SEVENTH REQUEST
FOR INTERROGATORIES TO GEORGIA POWER COMPANYI. INTRODUCTION

Pursuant to 10 C.F.R. §2.740b, Allen Mosbaugh hereby requests that Georgia Power Company (hereinafter referred to as "GPC") answer the following interrogatories in writing and under oath, and produce any documents requested herein that have not already been produced.

II. INSTRUCTIONS

A. If you cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying and explaining your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

B. Each interrogatory is a continuing one, and should be supplemented as required by 10 C.F.R. §2.740(e).

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F. As used herein, the term "person" shall mean any individual, partnership, firm, association, corporation or other government, legal or business entity.

G. As used herein, the term "detail" and the phrases "state in detail" and "describe in detail" shall mean that you are requested to state, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event and date, relating to or otherwise pertaining to the matters inquired of in said interrogatory.

H. 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. INTERROGATORIES

1) In respect to all analysis performed prior to any hearing held in this proceeding concerning any trip, failure or problem¹ experienced by any of Plant Vogtle's diesel generators. (1A, 1B, 2A and/or 2B) between Jan 1, 1990 and present, provide the following information:

a) State the cause(s) or suspected cause(s) of the failure, trip, or problem;

¹ As herein used the term "Problem" is used as in the April 9, 1990 Corrective Action response letter.

b) State whether the cause or causes were determined to constitute the "root cause" for the trip, failure or problem;

c) State whether the analysis indicated any similarity with any other failure, trip or problem experienced;

d) State whether any form of "root cause" assessment was ever determined;

e) State whether any corrective action was taken or planned.

2) The April 9, 1990 COA states on page 3, No. 4, that "GPC has reviewed air quality of the diesel generator air system including dewpoint control." With respect to this statement respond to the following:

a) Who was responsible for conducting this review;

b) What source documents were inspected or reviewed;

c) How was the information transmitted to the drafter of the COA.

3) The April 9, 1990 COA on page 3, No. 4 states that "initial reports of higher than expected dewpoints were later attributed to faulty instrumentation". With respect to this statement, respond to the following:

a) Identify each and every piece of faulty equipment believed to be responsible for the higher than expected readings;

b) Identify the author of this phase;

c) What documents were relied upon to conclude instruments were faulty; Who relied upon this information; and,

What form of verification was conducted to determine the accuracy of this information.

4) State whether any engineers, managers or technicians observed water "pouring out" of any diesel trips line(s).

5) State the identity of any technician or personnel who saw a jar of fluid which came from a diesel trip line.

6) Identify any personnel with knowledge of water in the diesel starting air system or the diesel air receivers. For each such person state the sum and substance of their knowledge (including how they obtained it, who they learned it from and anyone they told of it.)

7) State who witnessed and performed the "initial inspection of one air receiver on April 6, 1990," identified in the April 9, 1990 COA. For each such person identified state whether they observed any residue in the receiver.

8) State the date and time the air receiver identified in interrogatory 7 above, was ever subjected to an internal inspection. With respect to each such inspection state:

- a) What residue was found;
- b) Whether any water was located;
- c) Identify any records of each such inspection.

9) Identify all procedures and requirements contained in the MT&E Program or any other program that must be followed when a piece of test equipment, specifically any ALNOR, EG&G or any other dewpoint necessary equipment is:

- a) suspected of being out of calibration;

- b) out of calibration;
- c) suspected of being faulty;
- d) determined to be faulty.


10) State what, if any, action required under any procedure addressed in interrogatory 9 above, was taken with respect to any piece of test equipment suspected of being faulty in the April 9, 1990 COA.

11) With respect to diesel generator 1B, state the start number, date and time when "the bugs" were worked out according to Mr. Bockhold.

12) State the date and times dryers were out of service in 1990. Provide information as to what records were maintained and a summary of information contained in those records for the year 1990. If no records exist or are maintained, then so state.

13) state all factual information contained in any outside operator round sheets concerning moisture or water when "blowing down" any diesel air receiver from June 1989 to June 1991.

Respectfully submitted,


Mary Jane Wilmoth
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001-1850
(202)234-4663

Attorney for Intervenor

DATED this 25th day of July 1994.

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