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Page 236
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BEFORE THE

UNITED STATES DEPARTMENT OF LABOR
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

ALLEN L. MOSEBAUGH,

Complainant,

vs.

GEORGIA POWER COMPANY,

Respondent.

VOLUME II

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

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

Wednesday, March 11, 1992

The above-entitled matter came on for hearing,
pursuant to Adjournment, at 9:00 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. 50-424/425-OLA-3

EXHIBIT NO.

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

☐ Staff ☒ Applicant ☐ Intervenor ☐ Other

☒ Identified ☒ Received ☐ Rejected

Date 7/19/95 Witness

Reporter

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1 of Georgia Power management that I wanted confidential
2 treatment.

3 Q. And after when you saw -- What was your
4 relationship with Mr. Robinson in terms of contact and
5 communications? And I'm not looking for the substance of
6 what was said, but just in terms of their number after this
7 document was signed.

8 A. It seems like over the summer, something like June
9 on, I believe I met with Mr. Robinson in the evening for
10 periods of four or five hours on four different occasions,
11 and two of those occasions there was sworn testimony
12 involved.

13 And then I had telephone contacts with Mr. Robinson
14 probably averaging one or two a week over the summer.

15 MR. STEPHEN KOHN: Your Honor, could we have a
16 short recess?

17 JUDGE GLENNON: How long?

18 MR. STEPHEN KOHN: Just five minutes.

19 JUDGE GLENNON: We'll take a short recess, about
20 five minutes.

21 (A brief recess.)

22 JUDGE GLENNON: Let's resume the hearing.

23 BY MR. STEPHEN KOHN:

24 Q. Calling your attention again to Complainant's
25 Exhibit 45, I notice that it's signed and dated on June 14th,

1 1990. When did you -- Did you meet with Mr. Robinson in or
2 about that time?

3 A. Yes, I did.

4 Q. On what date?

5 A. It seems like I remember meeting with him on like
6 the evening of the 13th and the 14th of June, two days I
7 think.

8 Q. When you met with Mr. Robinson in that time period
9 did you give him anything?

10 A. Yeah. I brought a number of detailed written
11 allegations to him.

12 I made reference earlier I think that after I had
13 found the information submitted in the LER to be false I
14 think I mentioned earlier that I had started drafting an
15 allegation.

16 I brought to Mr. Robinson a number of very detailed
17 written allegations, and I believe with the execution of that
18 confidentiality agreement, you know, I provided all those
19 written allegations to Mr. Robinson.

20 Q. Did you use anything to help you when you were
21 drafting those written allegations?

22 A. I guess I'd like to say about the allegations, you
23 know, this was the most serious, you know, I think of all the
24 allegations, and I gave them to him at this time, and I had
25 started preparing that back in the late April time frame,

1 and, yeah, I spent a lot of time, I took a lot of work trying
2 to, you know, get it in the sequence of events and the things
3 that happened to be extremely accurate.

4 I reviewed a lot of documentation, I used my tape
5 recordings, I would relisten to segments of the tape
6 recordings to make sure that my recollection was exactly true
7 and so that I could write a factual allegation that would be,
8 you know, perfectly accurate and true, and then I gave those
9 to Mr. Robinson.

10 Q. At this time did you tell Mr. Robinson that you had
11 utilized tape recordings to prepare this documentation?

12 A. No. The documents -- the documents were very high
13 quality and very detailed, and because of the way they had
14 been prepared they were certainly as much as I felt -- you
15 know, I felt, you know, that they spoke for themselves, they
16 were an accurate reflection of what had happened.

17 Q. Did you tell Mr. Robinson that you had tape
18 recordings?

19 A. No, I didn't.

20 Q. Why not?

21 A. Well, I guess I felt that I had what seemed to me
22 to be a bad experience initially, I felt I had been found out
23 on the dilution valves allegation that I had sent in, and I
24 didn't expect anybody to recognize that it might have been me
25 despite all the preparations I had made, and at this point