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August 30, 1995

Via Fax

Hon. Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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


Hon. Thomas D. Murphy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: In the Matter of Georgia Power Company,
et.al. (Vogtle Electric Generating Plant,
Units 1 and 2) Dockets Nos. 50-424-OLA-3 & 50-
425-OLA-3, ASLBP No. 93-671-01-OLA-3

Dear Sirs:

I am herewith transmitting proposed Interrogatory and document requests Intervenor seeks from Licensee in order to adequately respond to expert testimony and other factual assertions raised by Licensee in this proceeding. The scope of discovery excludes the 1995 discovery of water and Mr. Stokes' testimony at the hearing denying knowledge of this event. Intervenor proposes that this matter be discussed at the conference today.

Sincerely yours,



Michael D. Kohn

cc: Service List

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PROPOSED INTERROGATORY QUESTIONS AND DOCUMENT REQUESTS

1. Between 1989-1991, in response to the completion or near completion of a calibration interval or during any other calibration check, state whether the M&TE program at plant Vogtle required "as found" readings to be recorded on dew point instrumentation, including the ALNOR and EGG Dewall (VP-2446 and VP-1114). If the answer is yes:
 - a. State whether "as found" readings were taken at any time after 4-7-90 for VP 2466, and provide the date such readings were taken and whether the readings indicated that the instrument was within specification;
 - b. Identify all GPC employees and agents who knew about the existence of "as found" readings taken on VP 2466. For each person identified, state the date and information known.
2. Produce a copy of the complete fax transmission of which a portion was marked as Intervenor's Exhibit II-215.
 - a. Identify from whom the transmission was sent and to whom it was received as well as all other persons, including attorneys, who reviewed the document in or about the time it was transmitted or thereafter made available to Mr. Briney.
3. State all the locations where VP-2466 was kept or stored between 4-7-90 and present and produce any paperwork associated with its transportation or storage during this time period.
4. Produce all documents pertaining to Alnor VP-2466 created between 1989 and present, including:
 - a. Travel sheets;
 - b. Certification documentation and documents related to calibration checks;
 - c. Communications to any vendor and/or the manufacturer.
5. Produce the Administrative Control procedures governing the M&TE program that were in effect in 1990.
6. Produce all drawings of the diesel control logic;
7. Produce all drawings of the layout of the diesel control and/or engine control panel and/or control panel of the diesel, including schematic 09-500-76021, and Engine Control Panel Schematic FW-700-7602, sheets 1-13.

8. Produce the MWO that was in progress when the 1991 Bubble testing misadventure occurred which resulted in the introduction of water into the diesel control system.
9. Produce all MWOs corresponding the MWOs identified in Intervenor's Demonstrative Aid No. 4.
10. Produce all documents created by, reviewed by or relied upon by Messrs. Hill and Ward when preparing expert testimony and/or when preparing to testify.
11. Produce Design Change Packages ("DCP") 91-V1N0113 and 91-V2N0114.
12. Produce DC 2-90-225.
13. Produce the following MWOs:
 - a. 2-90-04795
 - b. 2-90-05610
 - c. 1-90-04621
 - d. 1-90-04622.
14. Produce the following MDDs ("Minor Deviation to Design"):
 - a. 90-V2M-193
 - b. 90-V1M-194
 - c. 89-V1M-194.
15. With respect to the results identified in MWOs 19303293, 29303950 and 19303290 and with respect to the June 30, 1994 Reply to Notice of Violation concerning these results, state the following:
 - a. Who made the determination that the dew point test equipment was suspect;
 - b. What steps were taken to determine that the test equipment was providing erroneous readings;
 - c. State whether "as found" readings for the dew point test instrumentation identified in the MWOs were obtained, and if so, what these readings were.
 - d. State whether the dew point instrumentation was next recelebrated or calibration checked, and produce all documentation pertaining thereto.
 - e. State whether the accuracy of the test equipment was ever resolved, and if so, produce all

documentation associated with identifying the root cause and the resolution.

- f. Produce the MWOs identified above and all DCs and/or MWO associated with the resolution and/or identification of the adequacy of the dew point measurements.
- g. State whether the suspected dew point instrumentation was used elsewhere in the plant at any time after it was suspected of providing inaccurate data.
- h. Produce all travelers associated with any suspected dew point instrument.

16. With respect to the following MWOs:

- a. 1-90-00068
- b. 1-90-00016
- c. 1-90-02711
- d. 1-91-03008
- e. 1-91-03009
- f. 1-91-04772
- g. 1-91-04829
- h. 1-90-01511
- i. 2-90-04795
- j. 1-90-01219
- k. 1-90-01409
- l. 2-93-03314
- m. 1-92-03584
- n. 1-92-03585
- o. 2-90-03403
- p. 2-92-00295
- q. 1-92-03577
- r. 2-92-01061
- s. 2-91-02840
- t. 1-91-01227
- u. 1-91-04783
- v. 2-92-02850

state whether any of these MWOs indicate that a Calcon sensor or component of the diesel pneumatic control system has failed or was suspected of malfunctioning. If the answer is yes, produce a copy of the MWO.

17. Produce the MWOs identified in Intervenor's Exhibit 115, at Inspection report 50-424/94-12 and 50-425/94-12 at p. 6, ¶2.4 (28 MWOs).

18. State whether any of the MWOs identified in Intervenor's Exhibit 115, at Inspection report 50-424/94-12 and 50-425/94-12 at p. 8, continuation of ¶2.5.1 (31 MWOs) indicate that out of specification dew points were obtained between 1988 and 1994; if the answer is yes, produce a copy of any MWO not previously produced.
19. Produce the entire I&C log for the period 3-9-90 to the end of 1991.