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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARDOFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

GEORGIA POWER COMPANY'S RESPONSE TO  
INTERVENOR'S MOTION TO CONDUCT DISCOVERY  
RELATED TO DEW POINT INSTRUMENTS

I. INTRODUCTION.

Georgia Power Company ("Georgia Power") opposes Intervenor's Motion to Conduct Discovery Related to Dew Point Instruments, dated October 6, 1995 ("Motion"). Intervenor's Motion provides no good cause justifying additional discovery related to dew point instruments at this late date.

At issue is a correction made by Mr. Michael Duncan to his June 9, 1995 testimony, wherein he had said that the Alnor VP-2466 dew point instrument when received by the vendor was in calibration in 1991. Tr. 8199-8200. Mr. Duncan now realizes he was in error, and that no "as found" readings of the instrument were taken by the vendor. Intervenor's expression of "surprise" at this correction is unreasonable and certainly does not justify the "blunderbuss" discovery request that Intervenor now seeks.

Georgia Power's case-in-chief and rebuttal testimony put Intervenor on notice that Mr. Duncan's June 9, 1995 testimony

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at the hearing was likely in error. Later document searches, conducted at the Board's request following Intervenor's unsupported attacks on Georgia Power counsel in the August 22 ex parte, in camera session, produced vendor documentation which conclusively showed that Mr. Duncan's testimony was in error. In addition to Mr. Duncan, NRC Staff witness Pierce Skinner has also concluded that vendor documentation clearly establishes that no "as-found" data was taken on the Alnor instrument when it was received by Alnor in 1991.

Further discovery, including document production and depositions, is very unlikely to yield any additional probative information. Georgia Power has already voluntarily produced, and thus Intervenor is already in possession of, everything Georgia Power, General Electric, and Alnor have been able to locate with respect to the calibration of the Alnor VP-2466 instrument dating from 1989. Mr. Duncan's and the NRC Staff's conclusions are based on this vendor documentation, discovered after an exhaustive search. These documents include a statement from Alnor to the NRC Staff affirming that there was no "as-found" data. Georgia Power personnel did not generate these documents and have no basis to interpret them other than according to their plain meaning. The documents speak for themselves. In any event, the 1991 as-found condition of the Alnor instrument is only tangentially related to the issue in this proceeding (whether Georgia Power misrepresented what it knew in 1990 to the

NRC). Therefore, the additional discovery requested by Intervenor is not necessary for an adequate record.

Furthermore, Intervenor's claim that he has good cause for additional discovery because Georgia Power did not properly respond to his discovery requests is without merit. Intervenor's assertions in this regard misrepresent the record and his attacks on counsel are wholly unjustified. The Board should reject such excesses out of hand.

Granting Intervenor's Motion at this late date is not justified, and further delay in the completion of this hearing caused thereby is prejudicial to Georgia Power. For all these reasons, Intervenor's Motion should be denied.

## II. BACKGROUND.

### A. Intervenor's 1994 Discovery Related to Dew Point Measurements and Instrumentation.

Intervenor conducted discovery concerning dew point measurements and dew point instrumentation over one year ago. This was the focus of his questioning during the depositions of Mr. Duncan on July 20, 1994 and Mr. Michael Hobbs<sup>1</sup> on August 4, 1994. Intervenor, however, elected not to have those depositions presented to the deponents for review and correction prior to the hearing.

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<sup>1</sup> Mr. Hobbs held the title Instrumentation and Control ("I&C") Superintendent in March-April 1990, but was assigned to a special task force at the time. In Mr. Hobbs' absence, Mr. Mark Briney served as the acting I&C Superintendent. Rebuttal Testimony of Mark Briney on Diesel Generator Reporting Statements (ff. Tr. 12075; Aug. 22, 1995) at 1.

In addition to these depositions, Intervenor submitted a Seventh Set of Interrogatories to Georgia Power on July 25, 1994. The pertinent requests from that filing and Georgia Power's responses are set forth below.

Intervenor's Interrogatory:

3) The April 9, 1990 COA on page 3, No. 4 states that "initial reports of higher than expected dew points 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 ph[r]ase;

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?

Licensee's Response:

3.a. (Duncan, Hobbs, Kitchens) VP-2466 (Alnor 7200U).

3.b. (Aufdenkampe, Bailey, Bockhold, Kitchens, Rushton, Ward) GPC is unable to determine who authored the quoted statement.

3.c. (Aufdenkampe, Bockhold, Burr, Burwinkel, Horton, Kitchens, Kochery, Stokes) GPC is unaware of any documents (other than Intervenor's Deposition Exhibit 44, Bates No. 46072) that were relied upon to conclude the instruments were faulty. GPC believes Mr. Mark Briney relied upon the Exhibit 44 notes and that the conclusion was based on the fact that the dew point measurements for all eight air receivers were outside the acceptance range at the same time (which was contrary to previous measurements). GPC is unaware whether or not this conclusion was independently verified at the time.

Intervenor's Interrogatory

9) Identify all procedures and requirements contained in the M&TE Program or any other program that must be followed when a piece of test equipment, specifically any Alnor, EG&G or any other dew point necessary equipment is:

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

Licensee's Response:

9. (Duncan, Hobbs) Vogtle Procedure 00208-C, "Control of Measuring and Test Equipment," states that measuring and test equipment ("M&TE") found to be out of calibration "shall be tagged or visibly identified as nonconforming and removed from service until adequate corrective measures have been taken." Id. at Step 4.2.7. Vogtle Procedure 20230-C, "Control of Instrument Shop Measuring and Test Equipment," states that "personnel using M&TE shall be responsible for . . . reporting any malfunctions or suspected malfunctions to the Instrument Shop supervisor . . ." Id. at Step 4.1.2. A "hold tag" is affixed to the M&TE when calibration is due or otherwise required. Id. at Step 4.4.2. Calibration checks are performed in cases where the calibration of an instrument is in doubt or the normal calibration interval arises. Id. at 4.12.3.

Intervenor's Interrogatory

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.

Licensee's Response:

10. (Duncan, Hobbs) A review of the M&TE Traveler associated with the instrument identified in Interrogatory 3.a. indicates that it was removed from service on April 6, 1990, and was not used again at Vogtle.

The response to interrogatory 10 was later supplemented by Georgia Power, on June 30, 1995, to indicate

based on a review of the M&TE traveler associated with the VP-2466 dew point instrument identified in Interrogatory 3.a., that the instrument was removed

from service on April 6, 1990, and was not used again at Vogtle. However, VP-2466 may have been used in the early morning hours of April 7, 1990 as well. This information is based on entries contained in Maintenance Work Orders 1-90-01651, 1-90-01770, 2-90-00964, and 2-90-01021. These work orders were not listed on the M&TE traveler for VP-2466 because VP-2466 was not being relied upon for meeting a plant requirement. Rather, the instrument was used so that its results could be compared with two other dew point instruments to determine if VP-2466 was providing accurate readings.

B. Mr. Duncan's Testimony at the Hearing.

Mr. Michael Duncan was called as an adverse witness by Intervenor on June 9, 1990. Tr. 8177-8178. Mr. Duncan testified that he reported to Mr. Mark Briney during March and April, 1990. Tr. 8179. Mr. Duncan did not personally take dew point readings during the March-April 1990 time frame nor at any point prior to that. Tr. 8220. Mr. Duncan did not recall having any indication around April 9, 1990 that any of the I&C technicians were improperly using dew point instruments, or that any dew point information was faulty; he did recall, however, that the accuracy of the readings from dew point instrumentation readings taken in the April 1990 time frame had been called into question. Tr. 8197-8198. Mr. Duncan did not know whether the Alnor dew point instrument, designated VP-2466, was ever determined to be inaccurate. Tr. 8199. Mr. Duncan was not involved in the decision of whether readings taken by VP-2466 should be relied on. Tr. 8225. Mr. Duncan testified that when VP-2466 was taken to the vendor to recalibrate it, the vendor determined that it was in calibration. Tr. 8199-8200. Intervenor did not question



Mr. Duncan concerning the factual or documentary basis for this testimony.

C. Intervenor's August 22 Ex Parte Accusations.

On August 22, 1995, Intervenor's counsel, Michael Kohn, alleged in an ex parte, in camera<sup>2</sup> session that Georgia Power and its attorneys knew the Alnor test instrument was not defective based on an Alnor Certificate of Traceability which, he claimed, established that the VP-2466 test instrument was returned to the vendor and found to be in calibration, consistent with Mr. Duncan's prior June 9, 1995 testimony. Tr. 12048; 12057. Intervenor also accused counsel for Georgia Power of hiding documents including the Certificate of Traceability<sup>3</sup> -- Intervenor alleged Georgia Power was required to produce these documents in response to Intervenor's discovery requests -- and of submitting perjured testimony in affidavit form from Mr. McCoy. Tr. 12269-71.

NRC Staff counsel, during the in camera session, pointed out that Intervenor's interpretation of the Alnor Certificate of Traceability might be incorrect. Tr. 12056-57.

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<sup>2</sup> Later the same day, the Board released this transcript from in camera status. Tr. 12258, 12271-72.

<sup>3</sup> The Alnor Certificate of Traceability is dated May 15, 1991 and bears the designation "AFTER DATA." It was included in Intervenor's Exh. II-215 along with a Certification Data Sheet, also dated May 15, 1991, and other documents. Intervenor selected the documents in his Exh. II-215 from a larger number of documents produced to Intervenor on August 21, 1995, as the documents which Mr. Briney reviewed in preparing for his testimony.

Intervenor then requested that he be allowed to call witnesses, either Mr. Sutphin or Mr. Duncan, to establish the meaning of the Certificate of Traceability. Tr. 12067. The Board decided that, before it made any further ruling, the NRC Staff should contact the vendor to determine whether the Certificate of Traceability supported Intervenor's position. Tr. 12067-68. That afternoon, the NRC Staff informed Intervenor that, based upon discussions with the vendor, data in the vendor's documentation was "as-left data." Tr. 12132-12133. At this point, Intervenor advised the Board:

During lunch, further thought was given as to the issues that were going to be looked at by Staff and we have concluded that Staff's review is probably not necessary, because we believe the record already establishes that information, and I thought I would make the Board aware of our thought about that over lunch, before we continued and went further.

Tr. 12141.

After considering further Intervenor argument on this topic, the Board said:

There are a couple of issues that we think are important here, and we would like to request that Georgia Power confirm that any "as found" dew point readings for the Alnor that's in question should be made available in discovery and to the Board. I know they probably looked for it already, but if there is any -- if there are any "as found" readings from any source after this instrument was questioned, we -- obviously that's essential to this case.

And the other thing that Georgia Power might do is respond to -- that we would appreciate it if Georgia Power would do is respond in writing to the suggestion that this was not properly -- that it should have been provided in discovery, these documents [referring to Intervenor Exh. II-215].

Tr. 12272 (August 22, 1995).



Georgia Power responded to the Board's August 22, 1995 ruling on September 20, 1995, after it had investigated the matter, including contacting representatives of Alnor and General Electric (Georgia Power's general contractor for calibration services). This review produced some additional documentation located by General Electric and Alnor. It also confirmed that no "as-found" data was taken by Alnor when it received VP-2466 in 1991. This was specifically confirmed by Alnor in a statement which Alnor provided to the NRC Staff, and which is attached to Mr. Duncan's Affidavit as Exhibit B, p. 5. As explained in the September 20 letter, this conclusion led Georgia Power to ask Mr. Duncan whether he believed that his June 9 testimony required correction based on a review of the relevant documentation; he concluded that it did. As a result, Mr. Duncan prepared an affidavit to correct his testimony which is discussed below.

In response to the Board's second direction, Georgia Power's September 20 letter stated that it had reviewed Intervenor's prior discovery requests and determined that they did not ask for the documents contained in Intervenor's Exh. II-215.

D. Intervenor's Additional Discovery Request.

On September 5, 1995, Intervenor served on Georgia Power an additional discovery request, which included a "Discretionary Board Request No. 4," seeking Alnor VP-2466 dew point instrument documentation created between 1989 and the

present, including travel sheets, calibration certification documents and vendor communications. Georgia Power's September 26, 1995 response stated that the requested documents would be produced. On September 26 and 27, 1995, Georgia Power produced the requested documentation which, together with other documents previously provided to Intervenor, comprise all documents Georgia Power is aware of related to the calibration of the Alnor VP-2466 instrument from 1989 to present. It includes all the documents that Georgia Power obtained from Alnor and GE related to this time frame in addition to the relevant plant MT&E and procurement records.

E. Mr. Duncan's Affidavit.

Mr. Duncan's September 19, 1995 affidavit (GPC Exhibit II-201) corrected one narrow aspect of his testimony -- whether Georgia Power's vendor determined that the Alnor dew point instrument (VP-2466) was in calibration. In his affidavit, Mr. Duncan explains both the factual basis for his initial June 9, 1995 testimony as well as the basis for his current conclusion that "as-found" data was not obtained and that the instrument cannot be considered to have been in calibration as received by the vendor in 1991. Mr. Duncan's affidavit was admitted into evidence on September 28, 1995 over the objections of Intervenor's counsel. Tr. 15444-46. The Board allowed Intervenor until October 6, 1995 to file a motion for further discovery.

F. The NRC Staff's Testimony.

On September 21, 1995, during the testimony of the NRC Staff panel of Messrs. Matthews, Skinner and Hood, Mr. Skinner confirmed that, based on vendor documentation, the Alnor VP-2466 dew point instrument was, in fact, faulty when received by the vendor in February, 1991. Tr. 14642-14643. The Staff had contacted the vendor, who stated that there were no records reflecting the as-found condition of the instrument.<sup>4</sup> Further, Mr. Skinner explained that the absence of "as-found" data would not be unusual if the instrument was damaged and required repaired before calibration measurements could be taken. Tr. 14643.

III. ARGUMENT.

- A. Intervenor's Claim of "Surprise" resulting from the Duncan Affidavit is Not Credible and, in any event, does not Justify the Extraordinary Discovery Requested.

Intervenor argues that Mr. Duncan's affidavit "constitutes surprise that is highly prejudicial to Intervenor." Motion at 1-2. However, Intervenor was aware that Mr. Duncan's June 9, 1995 testimony may be incorrect because it was inconsistent with the June 1, 1995 testimony of Mr. Bockhold.<sup>5</sup>

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<sup>4</sup> Presumably, Mr. Skinner was referring to the statement from Alnor's Mr. Wade which is attached to Mr. Duncan's Affidavit as Exhibit B, p. 5.

<sup>5</sup> See Supplemental Testimony of George Bockhold, Jr. on Diesel Generator Air Quality Statements (ff. Tr. 6398, June 1, 1995) at 2-3. As corrected, Mr. Bockhold's prefiled testimony at p. 3 reads:

Intervenor was further put on notice that Mr. Duncan's June 9 testimony may be in error through the testimony of Mr. Mark Briney, a rebuttal witness for Georgia Power and Mr. Duncan's immediate supervisor in March-April 1990.<sup>6</sup> In April 1990, Mr. Briney directed I&C technicians to take dew point measurements after the issue of high dew point readings was raised by the NRC. Tr. 12079-12080. Mr. Briney believed enough information was obtained by the I&C technicians with enough different test equipment to conclude that prior readings were associated with a defective VP-2466 instrument. Tr. 12092; 12095-12097. At this juncture, Intervenor was on notice that, in addition to Mr. Bockhold's testimony, Mr. Briney's testimony was inconsistent with Mr. Duncan's June 9 testimony.

Moreover, the Staff reported to the Board and the parties on August 22, 1995, that they did not believe the Alnor Certificate of Traceability, included in Intervenor Exh. II-215, showed that "as found" data had been taken, contrary to Intervenor's assertions earlier in the day. Tr. 12132-33. Rather than requesting the Staff to continue its review of Alnor's actions with respect to VP-2466, Intervenor advised the Board that further review "is probably not necessary."

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My Instrumentation & Control ("I&C") supervisor at the time, Mr. Mark Briney, concluded that the GPC Alnor readings were the result of faulty instrumentation because the dew point readings for all eight air receivers were outside the acceptable range at the same time. I believed his conclusion was reasonable.

<sup>6</sup> Georgia Power distributed the Prefiled Rebuttal Testimony of Mr. Briney on August 18, 1995.

Intervenor likely chose this course because he realized that Mr. Duncan's June 9 testimony, which supported his theory, was in jeopardy. Intervenor had not established the basis for Mr. Duncan's June 9 testimony and he obviously did not want anything else to turn up which would disturb it.

Given the testimony of Messrs. Bockhold and Briney and the fact that, pursuant to the Board's August 22nd request, Georgia Power and the NRC Staff were searching for further documentation of the "as found" condition of the Alnor VP-2466 instrument, Intervenor cannot seriously contend that he was surprised to learn that Mr. Duncan was correcting his testimony.

Intervenor further asserts that good cause exists for further discovery because Georgia Power should have included Mr. Duncan's Affidavit testimony in its case-in-chief. Motion at 1. Intervenor is grasping at straws. Georgia Power's case-in-chief addressed the issues identified in the Board's Memorandum and Order (Summary Disposition: Air Quality), dated April 27, 1995, at 7-8, including the April 9, 1990 letter's statement that recently obtained high dew point readings were the result of faulty instrumentation. See Supplemental Testimony of George Bockhold, Jr. on Diesel Generator Air Quality Statements (ff. Tr. 6398, June 1, 1995) at 2-3. Georgia Power did not anticipate that Mr. Duncan would express a mistaken belief, when he was subsequently called as a witness by Intervenor (nor was it clear that Intervenor would call him as a witness), concerning the condition of the Alnor dew point instrument in 1991.

Even if Intervenor were "surprised" by Mr. Duncan's correction to his June 9 testimony, such surprise does not justify granting the extraordinary discovery requested by Intervenor of Georgia Power and its vendors. Intervenor has all the documentation that Georgia Power, Alnor and General Electric could locate concerning the calibration of the Alnor VP-2466 dew point instrument dating from 1989 to present. Intervenor should not be entitled to discovery concerning other dew point instruments, such as the VP-1114, since only the VP-2466 was addressed in Mr. Duncan's Affidavit. Depositions of Georgia Power personnel are not justified since the controlling documentation was generated by the vendor. Other Georgia Power personnel will not be able to bring any personal knowledge to the interpretation of the vendor's documentation and, therefore, cannot improve upon the testimony of Messrs. Duncan and Skinner. Furthermore, depositions of vendor personnel are not justified. Intervenor was fully able to conduct his own inquiry of the vendors, without leave of the Board, long before now. Instead, Intervenor delayed until the last possible moment and, apparently without performing any preliminary inquiry, now requests formal discovery of the vendors. This should not be permitted.

Because the discovery requested by Intervenor is not reasonably calculated to lead to the discovery of admissible evidence, it should not be granted. Moreover, the hardship to Georgia Power caused by further delay of this proceeding,



resulting from granting Intervenor's Motion, will be prejudicial to Georgia Power.

B. Georgia Power was Fully Responsive to Intervenor's Discovery Requests.

Intervenor claims that good cause exists for the discovery he requests because (1) documents appended to Mr. Duncan's affidavit should have previously been "revealed during discovery," and (2) "Georgia Power seeks to admit documents [Mr. Duncan's Aff.; GPC Exh. II-201] into the record which were never provided to Intervenor during discovery and which contain facts that should have previously been provided to Intervenor when Georgia Power submitted response [sic] to Intervenor's seventh set of Interrogatory questions." Motion at 1-2.

With respect to the production of documents, Intervenor conveniently overlooks the history of Intervenor's Seventh Set of Interrogatories, dated July 25, 1994 (Intervenor Exhibit II-36). In its Response to Intervenor's Seventh Request for Interrogatories (August 8, 1994), Georgia Power objected to the request for documents contained in these interrogatories. The Board's Memorandum and Order (Intervenor's Seventh Set of Interrogatories), dated August 8, 1994, at 2, ruled that the document requests were late and would not be permitted pursuant to NRC rules. The Board accepted Intervenor's oral stipulation

that the Seventh Set of Interrogatories should not be interpreted to include document requests.<sup>7</sup> Board Order at 2.

Intervenor's Motion, at 3, further asserted that Georgia Power's interrogatory responses failed to "identify" documents and other information.

Georgia Power's interrogatory answers (sworn to by Mr. Duncan and others) fail to identify any documents contained in Mr. Duncan's affidavit; fail to identify any verification efforts undertaken to determine the accuracy of the Alnor; failed to mention any facts associated with any attempt to calibrate the instrument; and failed to indicate that any persons associated with the M&TE program knew that the Alnor was defective or was suspected of being defective.

The inaccuracy of these representations is apparent when the discovery requests referred to by Intervenor are reviewed. In a nutshell, Intervenor's interrogatories simply did not call for the identification of the documents and information which he now claims were secreted away by Georgia Power. Moreover, certain documents appended to Mr. Duncan's Affidavit, namely Exhibit B, pp. 2-5, were provided to Georgia Power by General Electric and Alnor in September 1995.

As is readily apparent from a review of Intervenor's interrogatories Nos. 3, 9 and 10, and Georgia Power's responses, quoted in Section II.A above, Georgia Power was fully responsive to those interrogatories. Intervenor cannot complain that Georgia Power should have provided more information than

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<sup>7</sup> The Board also authorized Georgia Power to limit its responses to the Seventh Set of Interrogatories to events occurring prior to the last alleged misrepresentation, i.e., August 30, 1990. Board Order at 2.

Intervenor requested. In any event, Georgia Power was not in possession of the vendor-generated documents at the time it responded to Intervenor's Seventh Set of Interrogatories. It was only after the Board's August 22nd request for additional information concerning the "as-found" condition of the Alnor VP-2466 instrument, that Georgia Power and the Staff contacted Alnor and General Electric.

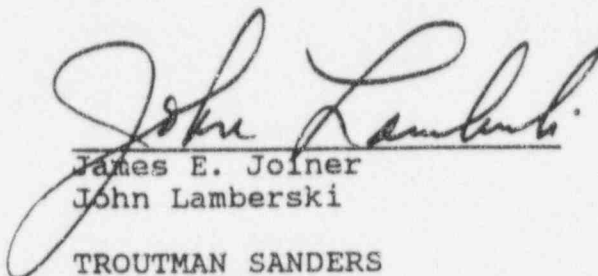
Intervenor's Motion, at 3, also asserts that good cause exists for further discovery concerning the EG&G VP-1114 dew point instrument because "when responding to discovery, Georgia Power failed to identify VP-1114 as being defective and/or providing faulty readings and failed to identify any corrective actions concerning VP-1114." Intervenor again misrepresents what his Seventh Set of Interrogatories requested. Georgia Power did not identify the EG&G VP-1114 dew point instrument in responding to Intervenor's Seventh Set of Interrogatories because Georgia Power was requested only to identify faulty equipment. Georgia Power has never maintained in this proceeding that the VP-1114 instrument was faulty or defective. Intervenor never requested the identification of equipment which provided readings believed to be in error because test instruments were not used properly.

#### IV. CONCLUSION.

Because Intervenor's claim of "surprise" resulting from the Duncan Affidavit is not credible, and because Georgia Power was fully responsive to Intervenor's prior discovery requests,

the extraordinary relief sought in Intervenor's Motion to Conduct Discovery Related to Dew Point Instruments, dated October 6, 1995, should be denied.

Respectfully submitted



James E. Joiner  
John Lamberski

TROUTMAN SANDERS  
Suite 5200  
600 Peachtree Street, N.E.  
Atlanta, GA 30308-2216

(404) 885-3360

Ernest L. Blake  
David R. Lewis

SHAW, PITTMAN, POTTS & TROWBRIDGE  
2300 N Street, N.W.  
Washington, D.C. 20037

(202) 663-8084

Counsel for Georgia Power Company

Dated: October 13, 1995

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION


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Before the Atomic Safety and Licensing Board OF SECRETARY  
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| In the Matter of            | ) | Docket Nos. 50-424-OLA-3  |
|                             | ) | 50-425-OLA-3              |
| GEORGIA POWER COMPANY,      | ) |                           |
| et al.                      | ) | Re: License Amendment     |
|                             | ) | (Transfer to Southern     |
| (Vogtle Electric Generating | ) | Nuclear)                  |
| Plant, Units 1 and 2)       | ) |                           |
|                             | ) | ASLBP No. 93-671-01-OLA-3 |

CERTIFICATE OF SERVICE

I hereby certify that copies of Georgia Power Company's Response to Intervenor's Motion to Conduct Discovery Related to Dew Point Instruments, dated October 13, 1995, were served by express mail, or where indicated with an asterisk, by facsimile, upon the persons listed on the attached service list this 13th day of October, 1995.

  
John Lamberski



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

In the Matter of  
GEORGIA POWER COMPANY,  
et al.

(Vogtle Electric Generating Plant,  
Units 1 and 2)

|   |                                |
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| * | 50-425-OLA-3                   |
| * |                                |
| * | Re: License Amendment          |
| * | (Transfer to Southern Nuclear) |
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| * | ASLBP No. 93-671-01-OLA-3      |

SERVICE LIST

\*Administrative Judge  
Peter B. Bloch, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Two White Flint North  
11545 Rockville Pike  
Rockville, MD 20852

\*Administrative Judge James H. Carpenter  
Atomic Safety and Licensing Board  
933 Green Point Drive  
Oyster Point  
Sunset Beach, NC 28468

\*Administrative Judge James H. Carpenter  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

\*Administrative Judge Thomas D. Murphy  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Two White Flint North  
11545 Rockville Pike  
Rockville, MD 20852

\*Michael D. Kohn, Esq.  
Kohn, Kohn & Colapinto, P.C.  
517 Florida Avenue, N.W.  
Washington, DC 20001

\*Office of Commission Appellate  
Adjudication  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Stewart D. Ebnetter  
Regional Administrator  
USNRC, Region II  
Suite 2900  
101 Marietta Street, N.W.  
Atlanta, GA 30303

\*Office of the Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Docketing and Services Branch  
Washington, D.C. 20555

\* Charles Barth, Esq.  
Mitzi Young, Esq.  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
One White Flint North  
Stop 15B18  
Rockville, MD 20852

Director, Environmental Protection  
Division  
Department of Natural Resources  
Suite 1252, 205 Butler Street, S.E.  
Atlanta, GA 30334