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(HAND DELIVER)

Miss Laurie Fowler
Legal Environmental Assistance Foundation
1102 Healey Building
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Dear Miss Fowler:

50-424,42504

Last week, on February 27, Jim Joiner and I called you to schedule depositions related to Contentions 7, 10.1, 10.3, 10.5, 10.7, 11, 12 and 14. We proposed to set aside at least the week of March 11 for the depositions.

Based on your responses to our interrogatories, we indicated that we would like to depose Howard M. Deutsch (Contentions 10.1, 10.3, 10.5, 10.7, 11 and 12), Carol Gelbaum (Contention 7), William Lawless (Contentions 7 and 12), James Ruttenber (Contentions 7 and 12), Tim Johnson (all contentions), Marc Merlin (Contention 14) and Robert Pollard (Contentions 10.1, 10.3, 10.5, 10.7 and 11). You stated that you intended to call all of them as your witnesses in the hearing. Based on your interrogatory answers, we presume that they will testify on the contentions identified above next to their names. Please let me know if this is not correct.

You said that you would contact those individuals about their availability for scheduling the depositions. Tim Johnson called Hugh Davenport yesterday afternoon to report that he

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would be available for depositions at any time, but that Dr. Deutsch would be available only for an hour on March 12, and that Mr. Lawless would be available only at 2:30 pm on March 11. Mr. Johnson said that he had been unsuccessful in contacting Ms. Gelbaum, Mr. Merlin, and Mr. Pollard. He had contacted Dr. Ruttenber, but had as yet not been able to schedule a date for him.

We estimate that the deposition of Mr. Lawless, and possibly Mr. Johnson, would require two days each, and that at least one day should be set aside for each of the others. Each deposition would continue until completed. We would expect the deponents to bring with them all relevant documentation in their possession.

Having tried unsuccessfully to reach both you and Mr. Johnson today, we have developed the following deposition schedule for your consideration:

March 12 and 13 -- Tim Johnson
March 14 -- Marc Merlin
March 18 and 19 -- William Lawless
March 20 -- Carol Gelbaum
March 21 -- James Ruttenber
March 25 -- Howard M. Deutsch
March 28 -- Robert Pollard

All would be deposed at the Troutman Sanders offices in Atlanta, except Mr. Pollard, who would be deposed at the Shaw Pittman offices in Washington. This information will be placed in a Notice of Depositions which we are required to file under section 2.740a(a) of the Commission's Rules of Practice.

If there are any problems with the schedule, please contact us, and we will attempt to work out mutually satisfactory arrangements.

Sincerely yours,


Bruce W. Churchill

cc: Service List (attached)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
GEORGIA POWER COMPANY, <u>et al.</u>)	Docket Nos. 50-424
)	50-425
(Vogtle Electric Generating Plant,)	
Units 1 and 2))	

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