

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
GEORGIA POWER CO., et al)
)
(Vogtle Electric Generating)
Plant, Units 1 and 2)

Docket Nos. 50-424
50-425

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CPG/GANE'S REPLY TO APPLICANT'S MOTION TO
CORRECT ASLB'S MEMORANDUM AND ORDER
DATED NOVEMBER 5, 1984

In its "Motion to Correct ASLB's Memorandum and Order Dated November 5, 1984," filed on November 14, 1984, Applicant requests the Board to delete from Contention 8 the words "for the preparation of correct concrete quality test records." Applicant claims that such a change is appropriate in light of the fact that a NRC investigation stemming from NRC SALP Report (IE Report No. 83-06), which both CPG and GANE alluded to in their original bases, resulted in a finding that allegations of falsification of concrete quality test records were unfounded.

CPG/GANE objects to any amendment of Contention 8. A close examination of the NRC Investigation, documented in IE Report No. 81-09 and attached to Applicant's Motion, reveals that Georgia Power Company has in fact failed to keep adequate concrete quality control records.

The NRC's inspection of quality records related to

batching, inspection and testing of Unit 1 base mat concrete showed that Applicant had failed to identify the individuals who performed the in-process testing of the plastic concrete. Applicant had also failed to identify the individuals who inspected the concrete placement for the pour in both Units 1 and 2. Applicant thus violated 10 CFR 50, Appendix B, Criteria XVII, requiring the identification of inspectors, testers or data recorders to be included on records. This incident was reported as Violation Item 424/81-09-01 and 425/81-09-01 "Failure to Maintain Sufficient QA Records in the Area of Concrete Testing." (IE Report No. 81-09 at p. II-14)

The NRC's inspection of the records on cyclinder testing performed during January 1980-1981 showed that Applicant had failed to disclose on the unconfined compression test data sheets the identity of the individuals performing cyclinder tests. NRC identified this "as another example of failure to maintain records as required by 10 CFR 50, Appendix B, Criterion XVII." (IE Report No. 81-09 at II-21)

Failure to identify testing and inspection personnel on records inhibits a close internal check on quality control procedures and hampers outside investigations into allegations of inadequate or unauthorized practices and procedures. As Applicant's own attachment shows that it has failed to maintain adequate inspection and test records to furnish evidence of activities affecting quality, as required by 10 CFR 50, Appendix B, Criterion XVII, Contention 8 should be preserved in its entirety as stated by the Board. We therefore request that

Applicant's motion be denied.

Respectfully submitted,

Laurie Fowler

Laurie Fowler for:

Legal Environmental Assistance
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Georgia and
Georgians Against Nuclear
Energy

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Reply to Applicant's Motion to Correct ASLB Memorandum and Order Dated November 5, 1984 have been served to all parties of record in this proceeding by deposit with the United States Postal Service in the City of Atlanta for delivery by Express Mail or by first class mail this the 30th day of November, 1984.

Respectfully submitted,

Laurie Fowler

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