

NUCLEAR REGULATORY COMMISSION
Docket No. 50-424/425-OLA-3 EXHIBIT NO. II - 230
In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2
☐ Staff ☐ Applicant ☒ Intervenor ☐ Other
☐ Identified ☒ Received ☐ Rejected Reporter SD
Date 9/15/95 Witness Ken Stokes

I-MOSBA-230
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USNRC

'95 OCT 20 August 8, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before the Atomic Safety and Licensing Board

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

GEORGIA POWER COMPANY'S THIRD SUPPLEMENTAL
RESPONSE TO ALLEN L. MOSBAUGH'S THIRD SET OF
INTERROGATORIES AND REQUEST FOR DOCUMENTS

I. INTRODUCTION

Georgia Power Company ("GPC") hereby provides a supplemental response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents to Georgia Power, dated May 17, 1994 (the "Third Request"). Specifically, this response provides the additional information required by the Licensing Board's Memorandum and Order (Motion to Compel), dated July 14, 1994.

II. SUPPLEMENTAL INTERROGATORY RESPONSES

A. Interrogatory 2

(Aufdenkampe, Bockhold, Stringfellow) GPC is not aware of the presence of any nonspeaking witnesses to the portion of the April 19, 1990 telephone conference call referenced in Intervenor's original interrogatory.

B. Interrogatory 4

(Burr, Stokes) GPC believes that, with one clarification, its prior response to Intervenor's interrogatory¹ continues to be appropriate based on the new definitions supplied in Intervenor's Motion to Complete Responses to Intervenor's Third Set of Interrogatory Questions and Document Request, dated June 22, 1994, at 4. The term "returned to service" used in NUREG-1410, Appendix J, at J-3, is not defined therein and GPC does not know what the NRC's definition of that term was. GPC believes the only reasonable definition for the term is the same point in time as defined by the term "declared operable."

C. Interrogatory 6

(Burr, Stokes) Attached is a table which identifies instances where GPC obtained an unsatisfactory dew point reading on the Vogtle emergency diesel generator (EDG) air supply system.² The table also notes the corrective actions taken of which GPC is aware. Dew point measurements were taken by Instrument and Control (I&C) technicians, as noted on the attached table, who were supervised by the I&C Superintendent, Mr. Mike Hobbs or Mr. Mark Briney.³ The I&C Superintendent reported to the Maintenance

¹ See Georgia Power Company's Response to Allen L. Mosbaugh's Third Set of Interrogatories, response to Interrogatory 4 at 37.

² The Vogtle acceptance range for these dew point readings is 32°F to 50°F. While the table identifies all instances where the dew point measurements recorded on the referenced maintenance work orders ("MWOs") were outside this acceptance range, actual dew points below 32°F are not possible with the Vogtle refrigerant-type air dryers.

³ Mr. Hobbs, who was the Vogtle I&C Superintendent, assumed a temporary role within another Maintenance Department group from February 1990 through the end of 1990. Mr. Mark Briney, who is no longer a GPC employee, acted as the I&C Superintendent during this period.

Manager, Mr. Harvey Handfinger.⁴ Mr. Handfinger reported to the Assistant Plant General Manager-Operations, Mr. W. F. Kitchens. Mr. Kitchens reported to the General Manager, Mr. George Bockhold. GPC is unable to state with certainty each instance where a senior official, which GPC interprets to mean a Vice President or higher, received communications regarding an unsatisfactory dew point reading. However, the Vice President-Vogtle Project, Mr. Ken McCoy, and the Senior Vice President, Mr. George Hairston, both attended the April 9, 1990 meeting between GPC and NRC Region II officials in Atlanta, Georgia during which the unsatisfactory dew point readings on EDG 2A were apparently discussed. See Mr. Jim Bailey's Meeting Notes from the April 9, 1990 meeting (Bates No. 000696).

D. Interrogatory 7

(Burr, Stokes) GPC has reviewed every work order listed in the computer printout provided to Intervenor in GPC's original response to this question and concluded that the work order information does not discuss whether or not the compressor associated with each air dryer was in-service at the time the air dryer was removed from service for maintenance. GPC knows of no method to identify each occasion during 1989 and 1990 when this condition existed as requested by the Intervenor. GPC also knows of no method to identify who knew this condition existed even after applying the guideline established by the Board in its July 14, 1994 Memorandum and Order. GPC is not aware of any routine or special reports that would document this condition (thus, there are no supervisors or managers responsible for documenting such a condition). Furthermore, based on document reviews and discussions with current GPC employees, GPC is unaware of any instance where

⁴ Mr. Handfinger is no longer a GPC employee.

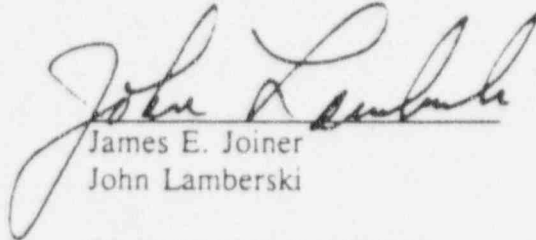
reviews and discussions with current GPC employees, GPC is unaware of any instance where this condition was noted and reported to senior officials.

Nevertheless, GPC believes there is a possible method to identify at least some of the information Intervenor seeks. It involves a two step approach. First, Intervenor can review the Unit Control Log for every day in 1989 and 1990 for entries related to air dryers and compressors being removed from service and then returned to service. This review is not likely to yield complete information because the Unit Control Log may not record every instance where such equipment is removed from and then returned to service. The task would involve a line-by-line review of thousands of pages of handwritten information. The Unit Control Logs for 1989 and 1990 are available to Intervenor for inspection and copying in the Atlanta, Georgia offices of GPC's counsel. Second, the Outside Area Operator Rounds Sheets, which GPC is producing pursuant to Intervenor's Fifth Interrogatory and Document Request To Georgia Power Company, dated August 8, 1994, includes a shift-by-shift check noting whether the EDG compressors are on. Intervenor may compare this information with the previously provided EDG air dryer maintenance work order ("MWO") information to identify instances where the air dryer may have been out of service while the associated compressor was in service. Of course, the air dryer MWO information does not necessarily reveal all time periods when the air dryer was out of service. GPC objects to conducting the research described above on the grounds that it is unduly burdensome and oppressive, and would require GPC to perform additional research and analyses which Intervenor is able to perform himself.

E. Interrogatory 15

(Ajluni) The "extent, purpose and methods" used by GPC to gather information about Intervenor were limited to inquiries concerning activities of Intervenor which relate to specific statements Intervenor made in support of his Intervention petition, including statements made by him or his counsel at the January 12, 1993 preliminary conference in Augusta, Georgia; the purpose of these limited inquiries was to determine the accuracy of these prior statements; and the methods employed were inquiries made by GPC counsel, and counsel's agents and employees.

Dated: August 8, 1994



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MWO	DATE	EDG/DRYER	DEWPOINT IN DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
18900984	03/18/89	1A/K01 1A/K02	22.8 20.1	D. ELROD	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER)
19000999	03/09/90	1A/K01 1A/K02	81 88	L. WILDER	RETESTED 3/12/90 K01-48 K02-45
19002652	08/09/90	1A/K01 1A/K02	12.9 -10.6	R. CULPEPPER	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) USED ROOT VALVES WHICH WAS DETERMINED TO REPRESENT A MORE CONSISTENT MOISTURE CONTENT. RETESTED: K01-34.5 K02-41.4
18902188	07/06/89	1A/K01	76	D. THOMPSON	REPLACED AIR DRYER. RETESTED: K02-48
19001513	03/31/90	1A/K01 1A/K02	80 80	M. WILKINS	CLEANED CONDENSING UNITS, MWO 19001513 INITIATED
19001851	04/05/90, 1800 EST	1A/K01 1A/K02	88, 78 87, 77	D. THAMES	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) BLEW DOWN AIR RECEIVERS AND USED DIFFERENT TEST EQUIPMENT. RETESTED 4/8/90 K01-41.3 K02-38.2
	04/06/90, 2030 EST	1A/K01 1A/K02	83 85	-	
	04/06/90, 0005 EST	1A/K01 1A/K02	85 85	-	
	04/06/90, 0426 EST	1A/K01 1A/K02	85 85	-	
	04/06/90, 0530 EST	1A/K01 1A/K02	85 80	D. LOHRMAN	
	04/06/90, 1530 EST	1A/K01 1A/K02	70 80	D. THAMES	
	04/06/90, 1700 EST	1A/K01 1A/K02	NONE TAKEN 76	-	
	04/07/90	1A/K01 1A/K02	NONE TAKEN 75, 15, 75	-	
		1A/K01 1A/K02	80, 33, 78	D.J.L (7)	
		1A/K01 1A/K02	19 19.1	J. STORM	
18901086	03/08/90	1B/K01 1B/K02	-2 -12	D. LOHRMAN	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWO 18901086 INITIATED
	03/22/90	1B/K01 1B/K02	-16 27		(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWO 18902188 INITIATED
18903217	08/16/89	1B/K01 1B/K02	-20 -22	D. THAMES	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) CONVERTED READINGS PER CHART IN ALNOR MANUAL: K01-38 K02-41

MWO	DATE	EDG/DRYER	DEWPOINT IN DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
19005009	11/13/89	18/R01 18/R02	-5 -10	S. ROUYER	NONE (ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) CONVERTED READINGS PER CHART IN ALNOR MANUAL. K01 = 38 K02 = 32
19001770	04/06/90 04/07/90	18/R01 18/R02 18/R01 18/R02	84 82 85, 18, 80 75, 18, 82	D. THOMAS D. LOHMAN	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) BLEW DOWN AIR RECEIVERS AND RETESTED 4/08/90 K01 = 44.5 K02 = 42.5
19001778	04/09/90	18/R01 18/R02	84 83	JEROME JACKSON	FOUND TEST EQUIPMENT OUT OF CALIBRATION. MWO VOIDED, FOUND ACCEPTABLE ON 4/9/90 VIA MWO 19001770
19004287 19004394	11/08/90 11/15/90	18/R02 18/R02	80, 64.4 82	B. BERRY B. BERRY	DRYER INOPERABLE REF: MWO 19004394 REPLACED FAN MOTOR AND CONTROL BOX PURGED RECEIVER TANK, RETESTED 11/23/90. K02 = 46.9
28902500	04/17/89	2A/R01 2A/R02 2A/R01 2A/R02	60.2 60.8 13.6 11.5	D. ELROD	NONE NOTED
28903855	06/21/89	2A/R01 2A/R02	27.6 17.5	J. ALLBROOK J. ALLBROOK	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER) MWO 28904592 INITIATED ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE W/IT.. THE VOGTLE-TYPE AIR DRYER; INCREASED RECEIVER PRESSURE TO 240 LBS. RETESTED; K01 = 35, K02 = 48
28904220	07/13/89	2A/R01 2A/R02	87 86	D. HINES	CONVERTED READINGS PER CHART IN ALNOR MANUAL. K01 = 49 K02 = 48
28904552	06/01/89	2A/R01 2A/R02	-41 -40	W. TEAFTER	(ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER)ELEVATED PRESSURE. K01 = 42 K02 = 44
28909080	01/26/90	2A/R01 2A/R02			

MWO	DATE	EDG/DRYER	DEWPOINT IN DEGREES F	PERSON ASSIGNED TO TAKE READINGS	CORRECTIVE ACTION(S)
29000864	04/07/90	2A/K01	85.30, 82	N. LEFTWICH	[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] BLEW DOWN AIR RECEIVER AND CHECKED WITH DIFFERENT SENSOR
		2A/K02	69.8, 81.5 98.30, 85 84.1, 50.9		
	04/08/90	2A/K01	81.4, 80.9	B. BERRY	
		2A/K02			
	04/09/90	2A/K02	81.8		
	04/10/90	2A/K01	69.8, 81.5		
		2A/K02	64.1, 50.9		
	04/11/90	2A/K01	57.4, 57.2		
		2A/K02	62.6, 54.1		
	04/14/90	2A/K01	43.8		
		2A/K02	47.3		
29001786	06/07/90	2A/K01	6.4		R. CULPEPPER
		2A/K02	6.3		
29003203	08/10/90	2A/K02	64.5	M. JENNING	MWO 29003809 WHITTEN TO INVESTIGATE NONE [ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] FOUND ACCEPTABLE
29003448	08/26/90	2A/K02	28.9	L. WILDER	
29004070	10/05/90	2A/K01	74.1	D. AQUINDE	BLEW DOWN AIR RECEIVER AND RETESTED. K01 = 48.1 K02 = 48.7
		2A/K02	84.3		
29003809	09/01/90	2A/K02	84.5	R. DIXON	FOUND BLOWN FUSE ON DRYER, REPLACED FUSE, RETESTED 11/4/90 AND FOUND ACCEPTABLE. [ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] RETESTED K01 = 34 K02 CONVERTED TO 38
29006790	11/16/89	2B/K01 2B/K02	17 -5	J. BURROUGHS	
29006193	12/06/89	2B/K01	7	D. PALMER	NONE [ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] USED PROPER CONVERSION CHART K01 = 36 K02 = 50
		2B/K02	19		
29001021	04/06/90	2B/K01	75, -10, 86	N. LEFTWICH	[ACTUAL DUE POINT BELOW 32.0 DEGREES F IS NOT POSSIBLE WITH THE VOGTLE-TYPE AIR DRYER] BLEW DOWN AIR RECEIVER AND RETESTED USING DIFFERENT SENSOR: K01 = 39.6 K02 = 44.8 SEE MWO 29004839
		2B/K02	80, 10, 80		
29004432	10/10/90	2B/K01	74.8, 78.4	B. BERRY	RETESTED USING DIFFERENT SENSOR: K01 = 38.4
	10/11/90	2B/K01	78		
29004839	10/28/90	2B/K01	58.9	J. FAIRB	

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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)

Docket Nos. 80-434-OLA-3
80-435-OLA-3

Re: License Amendment
(Transfer to
Southern Nuclear)

ASLEP NO. 93-671-OLA-3

AFFIDAVIT OF KENNETH C. STOKES

I, Kenneth C. Stokes, being duly sworn, state as follows:

1. I am currently employed by Georgia Power Company as Senior Engineer, Vogtle Electric Generating Plant.

2. I am duly authorized to verify Georgia Power Company's Third Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories and Request for Documents, specifically the responses to Interrogatory Nos. 4., 6. and 7.

I hereby certify that the statements and opinions in such response are true and correct to the best of my personal knowledge and belief.

Kenneth C. Stokes
Kenneth C. Stokes

Sworn to and subscribed
before me this 8th day
of August, 1994.

Stephen L. Zell
Notary Public
My commission expires July 21, 1998

Notary Public, Pineland, Georgia
My Commission Expires July 21, 1998

