

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 and 50-425

CAMPAIGN FOR A PROSPEROUS GEORGIA/GEORGIANS AGAINST NUCLEAR ENERGY

FOURTH SET OF INTERROGATORIES AND REQUESTS TO PRODUCE

Pursuant to 10 CFR Sections 2.740 (b) and 2.741, Intervenor Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy (hereinafter "CPG/GANE") hereby serves its Fourth Set of Interrogatories and Requests to Produce upon the Applicant in the above-styled proceeding. These interrogatories and requests to produce involve CPG/GANE's Contention 8.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to the Applicant including its officers, employees, agents, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of, or are otherwise available to, the Applicant, including its officers, employees, agents, advisors or counsel. In answering each interrogatory and responding to each request, please recite the interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response, including but not limited to his or her name, address, employer, current position and a statement of professional qualifications.

These interrogatories and requests shall be continuing in nature. Thus, whenever any information is obtained which renders any previous response incorrect or incomplete or indicates that a response was incorrect or incomplete when made, the Applicant is hereby requested to supplement its previous response to the

appropriate interrogatory or request to produce.

The term "document" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. CPG/GANE requests that at dates to be agreed upon, the Applicant make available for inspection and copying all documents subject to the requests set forth below.

#### Requests for Documents

Pursuant to 10 CFR Section 2.741, CPG/GANE requests Applicant, by and through its attorneys, make available for inspection and copying, at a time and location to be designated, any and all documents of whatsoever description identified in the responses to the Intervenor's interrogatories below, including but not limited to:

- (1) any written record of any oral communication between or among Applicant, its advisors, consultants, contractors, agents, attorneys, and/or any other persons, including but not limited to the NRC staff, the Intervenor, and their advisors, consultants, contractors, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts and notes of meetings.

If Applicant maintains that some documents should not be made available for inspection, Applicant should specify the documents and explain why such are not being made available. This requirement extends to any such document, described above, in the possession of or available to the Applicant, its advisors, consultants, agents or attorneys.

#### Interrogatories

Pursuant to 10 CFR Section 2.740(b), CPG/GANE requests the Applicant by and through its attorneys answer separately and fully in writing, under oath or

affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatories apply to CPG/GANE Contention 8:

1. Please identify (by name, business address, occupation and employer) a) all individuals who have knowledge or information responsive to each interrogatory and designate the interrogatory or the part thereof which that individual answered.

2. Have Applicants identified an expert or experts whom they will call in this proceeding? If so, please identify the witness, the subject matter on which he or she will testify and the substance of that testimony, the witness's educational and professional background, and any previous proceedings in which that person has testified.

Interrogatories Relating to CPG/GANE Contention #8

1. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: When the Applicant recently fired employees involved in procurement due to allegations of bid-rigging, what investigations were performed to assure that quality of materials and work was not affected as well as pricing? What was the result of these investigations? Please provide details, including copies of the investigation results. Contrary to Applicants claim, this question is entirely within the scope of Contention 8 as admitted by the Board. Please provide a complete response to this interrogatory.

2. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Have any employees or bidders alleged that political or personal favoritism has resulted in preferential treatment being given to some contractors? Please provide details. Contrary to Applicants' claim, this question is entirely within the scope of Contention 8 as admitted by the Board. Please provide a complete response to this question.

3. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Has any contractor, including but not limited to Westinghouse Corporation and Bechtel, taken officials of the Applicant on trips to Europe or provided other benefits to them? Please provide details. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board; if Applicants selected vendors based on any criteria other than quality assurance, then the selection process has an impact on the assurance of quality. Please answer this question fully.
4. Please describe in detail each citation for violation of NRC rules, regulations and procedures at Plant Vogtle since the construction permit was issued.
5. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Have there been any allegations of harassment or intimidation of inspectors at Plant Vogtle? If so, list each such incident and provide details. Contrary to the Applicants' claims, this question is clearly within the scope of Contention 8 as admitted by the Licensing Board. Please provide a complete response to this question.
6. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: List every act of vandalism directed at the structure of Plant Vogtle or components thereof, giving the date, extent and location of each incident, and explain how the vandalism was discovered. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board. Please provide a complete response to this question.
7. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Have any workers been fired for any reason by the Applicant and/or its contractors/subcontractors following allegations of poor construction or QA practices at Plant Vogtle they made to the NRC, news media, or any other person or entity? Provide details. This question is entirely within the scope of Contention 8 as admitted by the Board. Please respond to this

question in full.

8. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Does the Applicant or any of its contractors or subcontractors maintain any quota or target system for dismissing workers? Provide details. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board. Please respond in full to this question.

9. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: What vendor provides core drilling at the site? What experience does this vendor have in this field? What training do its workers have in core drilling? Provide details. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Licensing Board. Please provide a complete response.

10. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: What tests have been conducted on the lifting eyes of concrete hatch covers? Provide details of the testing, including results. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board. Please respond fully to this question.

11. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: What measures have been taken regarding unqualified motors in Limitorque motor-operated valves? Please provide details of the problem and the Applicant's response thereto. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board; please provide a complete response.

12. Applicants refused to respond to the following Intervenor's question in Intervenor's Second Set of Interrogatories: Describe in detail any problems the



Applicant has experienced with the residual heat removal system, including potential consequences and measures to correct each problem. Contrary to the Applicants' claims, this question is entirely within the scope of Contention 8 as admitted by the Board. Please provide a complete response.

13. Describe all deviations from design specifications and procedures at Plant Vogtle.

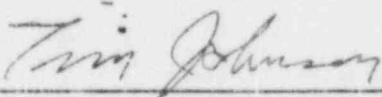
U. Requests to Produce Relating to CPG/GANE Contention #8

1. Applicants refused to respond to the following Intervenor's request to produce in Intervenor's Second Set of Interrogatories and Requests to Produce: Provide copies of all contracts with A & W Oil. This request is within the scope of Contention 8 as admitted by the Board and Intervenor's request compliance with this request.
2. Applicants refused to respond to the following Intervenor's request to produce in Intervenor's Second Set of Interrogatories and Requests to Produce: Provide a copy of the contract for the Westinghouse NSSS. This is within the scope of Contention 8 as admitted by the Board; Intervenor's request that Applicants provide this information.
3. Applicants refused to respond to the following Intervenor's request to produce in Intervenor's Second Set of Interrogatories and Requests to Produce: Provide a copy of the contract with Bechtel. This is relevant to Contention 8; Intervenor's request a copy be provided.
4. Applicants refused to respond to the following Intervenor's request to produce in Intervenor's Second Set of Interrogatories and Requests to Produce: Provide all information relating to the "inadequate core cooling system" as discussed at the meetings June 12 and June 27, 1984. This question is within the scope of Contention 8 as admitted by the Board. In fact, Applicants acknowledge the relevance of this information as they request that Intervenor's provide "each and every document which

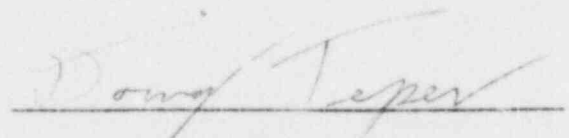
has been received...in response to a freedom of information act request made to the Nuclear Regulatory Commission pertaining to documents regarding the adequacy of the core cooling system of Vogtle Nuclear Power Plant" (p. 84, "Applicants' Fourth Set of Interrogatories and Request for Production of Documents") which the Applicants state is "on Contention 8" (ibid., p. 1). Please provide a complete response to this request.

5. Applicants refused to respond to the following Intervenor's request to produce in Intervenor's Second Set of Interrogatories and Requests to Produce: Provide all documents relating to core drilling into rebars at Plant Vogtle. Contrary to Applicants' claims, this is entirely within the scope of Contention 8 as admitted by the Board. Please respond fully to this question.

Respectfully submitted, this, the 11th day of March, 1985,



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