

KOHN, KOHN & COLAPINTO, P.C.
ATTORNEYS AT LAW
517 FLORIDA AVENUE, NW
WASHINGTON, DC 20001
(202) 234-4663

MICHAEL D. KOHN**
STEPHEN M. KOHN***
DAVID K. COLAPINTO***

OF COUNSEL:
DANIEL I. GSHTRY**
ANNETTE R. KRONSTADT*

* ADMITTED IN PA
* ADMITTED IN NJ
* ADMITTED IN DC
* ADMITTED IN MA

June 13, 1990

Confidential

Larry Robinson
NRC - OI

Dear Mr. Robinson:

As you are aware, on February 8, 1990 you interviewed Mr. Allen Mosbaugh regarding NRC - OI's investigation of the mid-loop injection of hydrogen peroxide and Georgia Power Company's decision not to report that incident. At the time of the interview, Mr. Mosbaugh was represented by the Troutman, Sanders law firm. See, February 12, 1990 letter from Arthur Domby to Mr. Mosbaugh. On page 47 of the transcript of Mr. Mosbaugh's interview, you asked Mr. Mosbaugh about rumors on site regarding the decision to open the valves resulting in the injection of hydrogen peroxide mid-loop. At that point you went off the the record so Mr. Domby could advise his client how to answer the pending question. During the course of the confidential discussions held off the record, Mr. Mosbaugh advised Mr. Domby that he could provide first hand information as to who opened the Domby advised his client not to volunteer that information because the question pending only concerned "rumors" not first hand information.

After the interview was closed, Mr. Mosbaugh became more and more uncomfortable with the advice of counsel. He drafted a memo regarding the statement Mr. Kitchens made in his presence and contacted new counsel.

It appears that a conflict of interest existed between Mr. Mosbaugh and GPC's counsel and as a result of that conflict Mr. Mosbaugh was improperly advised to withhold information during the course of your investigation.

Enclosed please find the draft memo Mr. Mosbaugh created after the interview. Mr. Mosbaugh believes this information is important and he would have provided it at the time of his interview but for the advice he received from his then Counsel of Record.

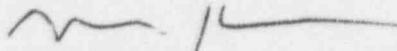
A/11/0
A/11/9

Release

Larry Robinson
June 13, 1990
Page Two

Mr. Mosbaugh looks forward to meeting with you in the near future and will assist you in any way he can. I am

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Michael D. Kohn'. The signature is stylized with a wavy line for the first part and a horizontal line for the last part.

Michael D. Kohn



KOHN, KOHN & COLAPINTO, P.C.

ATTORNEYS AT LAW

517 FLORIDA AVENUE, NW
WASHINGTON, DC 20001

Larry Robinson
280 17th Fairway
Roswell, GA 30076

