

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  
(OL)

NRC STAFF RESPONSE TO APPLICANTS' STATEMENT  
OF MATERIAL FACTS AS TO WHICH NO GENUINE ISSUE  
EXISTS TO BE HEARD REGARDING CONTENTION 11

Appended to their Motion for Summary Disposition of Contention 11, Applicants submitted a document entitled "Statement of Material Facts as to which no Genuine Issue Exists to be Heard Regarding Contention 11." That document contained 15 numbered Statements of Material Fact which, pursuant to 10 C.F.R. §2.749(a), must be either controverted by the other parties or will be deemed admitted for purposes of any litigation which may involve Contention 11. As explained in the attached Affidavits of Jai Raj Rajan (§ 13) and William LeFave (§ 10), the NRC Staff agrees with all the Statements of Material Fact submitted by the Applicants relating to Contention 11.

Respectfully submitted,



Robert G. Perlis  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 30th day of July, 1985

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