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August 8, 1985

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OFFICE OF SECRETARY  
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Re: Vogtle Electric Generating Plant,  
ASLB Docket Nos. 50-424 and 50-425  
(Intervenors' Response to Motion for  
Summary Disposition of Quality  
Assurance Issues)

Dear Laurie:

We have received Joint Intervenors' July 31, 1985 Response to Applicants' Motion for Summary Disposition of Intervenors' Contention No. 8. In that pleading, Messrs. Johnson and Teper represent to the Atomic Safety and Licensing Board that "Intervenors are in touch with current and former workers of the plant, some of whom are willing to testify on QA concerns" (Response at p.5). Joint Intervenors also represent to the Board that there may be additional instances involving "QA breakdowns" (Response at p.6). While no particulars were provided, Joint Intervenors referred parenthetically to the meeting of a subcommittee of the Advisory Committee on Reactor Safeguards held in Augusta, Georgia on July 18 and 19, where Mr. Johnson made a number of allegations based on statements of unidentified individuals.

We have carefully reviewed Mr. Johnson's statements to the ACRS subcommittee. Because they were so sketchy, it is difficult for Georgia Power to follow up on them. Our attempts are further hampered by not knowing the identity of the individuals who made the allegations. For example, we do not know when or where the events were supposed to have occurred, and in many cases we cannot even determine whether the alleged occurrences involved safety-related work, or whether they had previously been documented and corrected in accordance with the project's QA procedures.

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Laurie Fowler, Esq.  
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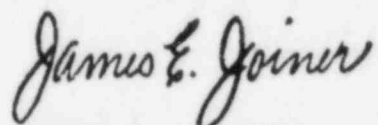
To the extent discernable, most of the allegations appear to be outside the scope of Contention 8 as defined by the Licensing Board. Also, the allegations are in the nature of discrete occurrences which, if true, could certainly not be fairly characterized as QA "breakdowns." Joint Intervenor, however, have suggested to the Licensing Board the possibility that some unidentified individuals may be presented to testify on QA concerns. We have repeatedly asked for the identity of individuals who have provided information upon which Joint Intervenor, rely in support of Contention 8 and we have asked for the substance of that information. In written discovery, and in Mr. Teper's deposition, we specifically called upon Intervenor, to provide us with all pertinent QA information in their possession and to identify individuals who provided information related to Contention 8. Pursuant to 10 C.F.R. Section 2.740(e)(1), Joint Intervenor, are under a duty to supplement their response to discovery and provide us with the identity and location of persons having knowledge of discoverable matters. In Mr. Teper's deposition, he agreed to provide the name of any person who supplied information related to Contention 8, although you reserved the right to file a Motion for Protective Order if the informant requested anonymity. (Teper deposition at pp.250-257).

Beyond the requirements of 10 C.F.R. Section 2.740(e)(1), however, Georgia Power Company is committed to assuring that Plant Vogtle is safely constructed and operated and to thoroughly investigating all safety-related allegations made known to it, no matter how vague or what the source. This commitment exists at all levels of corporate management and is unrelated to the present contested licensing proceeding. Thus, regardless of whether allegations of unsafe construction practices at Plant Vogtle are within or without the scope of Contention 8 as raised by the Intervenor, Georgia Power Company needs to be informed immediately of any and all allegations relating to safety, so that full and complete investigations can be conducted and any problems resolved. We ask Joint Intervenor, to assist us in this regard. Because of the implications of such matters on the public health and safety, we consider your cooperation to be a responsibility which far outweighs anyone's desire to withhold or delay information.

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For these reasons, we ask that you define and more specifically identify the instances of improper construction practices which Joint Intervenors believe calls into question the safety of Plant Vogtle and provide us with the identity of each individual who has provided information which Joint Intervenors believe calls into question the safety of Plant Vogtle. We ask you to do this immediately so that we can begin the proper investigation and resolution of any such issues.

Sincerely.

A handwritten signature in cursive script that reads "James E. Joiner".

James E. Joiner

JEJ/sgp

cc: Service List

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
GEORGIA POWER COMPANY, <u>et al.</u>	)	Docket Nos. 50-424
	)	50-425
(Vogtle Electric Generating Plant,	)	
Units 1 and 2)	)	

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