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December 20, 1985

RELATED CORRESPONDENCE

DOCK 113

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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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. 50-424
50-425
(OL)

NRC STAFF MOTION TO COMPEL DISCOVERY

1. On October 7, 1985, the NRC staff (Staff) propounded Emergency Planning Interrogatories to Joint Intervenors in this proceeding. Pursuant to the Licensing Board's September 19, 1985 "Order (Setting Discovery Schedule for Emergency Planning Contentions)" responses to these Interrogatories were due by November 7, 1985.

2. On November 14, 1985, the undersigned Staff Counsel contacted by telephone Mr. Tim Johnson, a representative of Joint Intervenors, to advise that the Staff had not received a response to the Interrogatories. Several additional phone conversations ensued between the undersigned and Mr. Johnson and on November 27, 1985, at Mr. Johnson's request, a copy of the October 7, 1985, Interrogatories was again forwarded to Mr. Johnson. ^{1/}

^{1/} It is unclear as to whether Joint Intervenors are claiming that none of their representatives received the October 7, 1985, mailing of the Interrogatories. A second copy was mailed in an effort to facilitate preparation of a response.

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3. To date, the Staff has not received answers to the Interrogatories in question. Additionally, Staff Counsel's further attempts to pursue this matter with Mr. Johnson by telephone have been unsuccessful.

4. Accordingly, the Staff respectfully moves the Atomic Safety and Licensing Board to issue an Order directing the Joint Intervenors to immediately respond to the Staff's October 7, 1985 Interrogatories.

Respectfully submitted,

Bernard M. Bordenick

Bernard M. Bordenick
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 20th day of December, 1985

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NUCLEAR REGULATORY COMMISSION

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(Vogtle Electric Generating Plant,)	
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION TO COMPEL DISCOVERY" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's mail system, this 20 th day of December, 1985.

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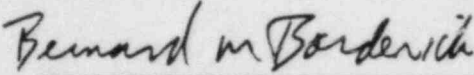
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