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Dated: July 1, 1993

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION
 ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Peter B. Bloch, Chair
 Dr. James H. Carpenter
 Thomas D. Murphy

In the Matter of

GEORGIA POWER COMPANY
et al.,

(Vogtle Electric Generating
 Plant, Unit 1 and Unit 2)

Docket Nos. 50-424-OLA-3
 50-425-OLA-3

Re: License Amendment
 (transfer to Southern Nuclear)

ASLBP No. 93-671-01-OLA-3

INTERVENOR'S SUPPLEMENTAL LIST OF DOCUMENTS
 AVAILABLE TO THE PARTIES

On the basis of the conference held between respective counsel for GPC, Intervenor, and NRC Staff on June 29, 1993, Intervenor agreed to make available all documents in his possession and control, including the Six Tapes and documentation Intervenor provided to NRC-OI^{1/}, with the exception of documents withheld under the attorney-client and/or the work product doctrine.

At the conference, Intervenor's counsel further agreed to identify and consider releasing documents otherwise considered to

^{1/} All documents generated by Mr. Mosbaugh are being produced. During the course of Case No. 90-ERA-58 certain documents then in the possession of Mr. Mosbaugh were, by order of the presiding Administrative Law Judge, turned over to NRC-OI. At that time Mr. Mosbaugh believes that he only had one copy of these documents in his possession which were provided to NRC-OI. The documents released to NRC-OI are identified in an affidavit prepared by Larry Robinson, dated 13 February 1991, a copy of which is attached to the June 27, 1993 letter to the ASLB panel from Intervenor's counsel.

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be attorney work product documents that contain segments or transcriptions of the tape recordings made by Intervenor that are not otherwise set out in the Six Tapes. Intervenor has located two such documents and will voluntarily release these two documents.

Pursuant to GPC counsel's request, Intervenor is releasing the Six Tapes on July 1, 1993 to a tape duplication facility known as "AVCOM," which is located at 1006 6th Street, N.W., Washington, D.C., 20001.

Inasmuch as NRC Staff's response to GPC's document requests may be deficient, Intervenor sets forth below a complete index to all written allegations and memorandum prepared by Allen Mosbaugh that have been provided to NRC and/or NRC-OI:

INDEX TO MEMORANDUM INTERVENOR PROVIDED TO NRC

1. Undated one page memo from Mosbaugh, entitled "Alternate Radwaste Building Liquid Radwaste System Failure Offsite Analysis";
2. Undated three page memo from Mosbaugh, untitled, first sentence beginning: "On the morning of 2-28-90...";
3. Undated three page memo from Mosbaugh, entitled "Operation Outside the Design Basis Fire Plus LOSP Defeats Safe Shutdown Design Capability";
4. Undated two page memo from Mosbaugh, to Robinson, untitled, first sentence beginning: "During my interview with you on 2-8-90...";
5. Undated two page memo from Mosbaugh, entitled "Failure to Perform Adequate Shutdown Margin Calculation Leads to Near Miss Inadvertent Criticality";
6. Undated five page memo from Mosbaugh, entitled "Uncontrolled Safeguards Documents In SONOPCO, SCS, Birmingham, Bechtel Gaithersburg, Bechtel Los Angeles, and GPC Atlanta";

7. Undated one page memo from Mosbaugh, entitled "Vogtle Procurement Policy Fails to apply 10 C.F.R. Part 21 requirements to procurement activities for Security...";
8. Undated two page memo from Mosbaugh, entitled "Sequencer out of service places plant in Technical Specifications "Motherhood" 3.0.3 action statement";
9. Undated three page memo from Mosbaugh to NRC, Attention Bruno Uric, entitled "Pat McDonald, Ken McCoy, and Georgia Power/SONOPCO lie in sworn statements...."
10. Undated six page memo from Mosbaugh, untitled, first sentence beginning: "Georgia power has made an additional material false statement..."
11. Undated six page memo from Mosbaugh, untitled, beginning with: "Please Note...The level of detail contained in this concern..."
12. Undated eighteen page memo from Mosbaugh to NRC, attention Bruno Uric, entitled "Georgia Power/SONOPCO response to 2.206 Petitioner is Lies, Smoke and Mirrors";
13. Undated eleven page memo from Mosbaugh to NRC, attention Bruno Uric, entitled "Georgia Power/SONOPCO 2.206 Petition Response is Filled with Lies";
14. Undated three page memo from "A Concerned Employee" (Mosbaugh) (Complainant's Exhibit 15 to Case No. 90-ERA-11);
15. Undated one page memo from "A concerned Employee" (Mosbaugh) (Complainant's Exhibit 35 to Case No. 90-ERA-11);
16. Undated one page memo, first line beginning: "Suddenly it has become a popular argument..." (Complainant's Exhibit 36 to Case No. 90-ERA-11).

Below Intervenor sets forth an index identifying the Six Tapes:

INDEX TO THE SIX TAPES

Note: The exact wording found on the container of each identified tape is stated in brackets:

1. Tape No.1 ("Tape #1 Copy, Side B 4-19 Diesel Conversation");

2. Tape No. 2 ("Tape #2 Copy);
3. Tape No. 3 ("Tape #3, Dup, Side A only, B blank");
4. Tape No. 4 ("Tape #4 Copy, Calvert Bus, No Side B");
5. Tape No. 5 ("Tape #5");
6. Tape No. 6 ("Orig., Critique of Site/Area Emergency, Diesel & Calcon Switch Failures").

Finally, intervenor sets forth an index identifying the two documents containing transcriptions of tape segments:

INDEX TO RELEASABLE TRANSCRIPTS

1. One page handwritten note faxed from Mosbaugh to Kohn, undated, concerning 8-6-90, 11:00 AM, G. Bockhold Staff meeting Vogtle Admin Bld, 2nd Floor Conf. Rm.;
2. One page handwritten note, faxed from Mosbaugh to Kohn, concerning 3-24-90 Site/Area Emergency Critique Meeting Service Building 3rd Floor conference Room.

With the exception of the Six Tapes, all other releaseable documents are available for inspection and copying at the law offices of Kohn, Kohn & Colapinto, P.C., 515 Florida Ave., N.W., Washington, D.C., 20001.

Respectfully submitted,



Michael D. Kohn
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

Dated: July 1, 1993

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ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges: '93 JUL -6 P5:37
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 1993 Intervenor's
Supplemental List of Documents Available to the Parties was
served via First Class Mail upon the following:

Administrative Judge
Peter B. Bloch, Chair
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Administrative Judge
Thomas D. Murphy
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Charles A. Parth, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Ernest L. Blake, Jr.
David R. Lewis
SHAW, PITTMAN, POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037

Office of the Secretary (Original and two copies)
Attn: Docketing and Service
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Michael D. Kohn
Kohn, Kohn & Colapinto, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

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