

14079
RELATED CORRESPONDENCE

Dated: June 24, 1993
USNRC

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

'93 JUN 30 AM 11:12

Before Administrative Judges:

Peter B. Bloch, Chair

Dr. James H. Carpenter

Thomas D. Murphy

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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 FIRST SET OF
INTERROGATORIES AND REQUEST FOR DOCUMENTS TO
STAFF OF THE U.S. NUCLEAR REGULATORY COMMISSION

I. INTRODUCTION

Pursuant to 10. C.F.R. §2.740b, Allen Mosbaugh hereby requests that Staff of the Nuclear Regulatory Commission (hereinafter referred to as "NRC") answer the following interrogatories in writing and under oath.

II. INSTRUCTIONS

A. If you cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying and explaining your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

9307160177 930624
PDR ADDCK 05000424
G PDR

DS03

B. Each interrogatory is a continuing one, and should be supplemented as required by 10 C.F.R. §2.740(e).

C. If you claim that any information which is required to be provided by you in your response to any of these interrogatories is privileged or immune from discovery:

1. Identify the portion of the interrogatory to which such information is otherwise the response;

2. If the information is a document or oral communication, identify the document's title or the oral communication and state the general subject matter of the document or oral communication;

3. If the information is a document or oral communication, state the date of the document or oral communication.

4. If a document, identify its author(s) and the person(s) for whom it was prepared or to whom it was sent, including all persons who received copies;

5. If an oral communication, identify all persons present at the time of the oral communication;

6. State the nature of the privilege or immunity claimed; and

7. State in detail each and every fact upon which you base your claim of privilege or immunity from discovery.

D. In each case where you are asked to identify or to state the identify of a document or where the answer to the

interrogatory refers to a document, state with respect to each such document:

1. The identify of the person who prepared it;
2. The identity of all persons who reviewed or approved it;
3. The identity of the person who signed it, or over whose name it was issued;
4. The identity of the addressee or addressees;
5. The nature and substance of the document with sufficient particularity to enable the same to be identified;
6. The date of the document; and
7. The present location of the document and the identity and address of each person who has custody of the document.

E. In each case where you are required to identify an oral communication, or where the answer to the interrogatory refers to an oral communication, state with respect thereto:

1. The date and place thereof;
2. The identity of each person who participated in or heard any part of the communication;
3. If the communication was by telephone, so indicate and state who initiated the telephone call;
4. The substance of what was said by each person who participated in the communication; and

5. The location and the identity and address of the custodian of any document (including any mechanical, magnetic, electrical or electronic recording) that recorded, summarized, reported or confirmed the oral communication.

F. In each instance where you are asked to identify or state the identity of a person, or where the answer to an interrogatory refers to a person, state with respect to each such person:

1. His/her name;
2. His/her last known business and residence addresses and telephone numbers;
3. If an individual, his/her business affiliation or employment at the date of the transaction, event or matter referred to; and
4. If a corporation or association, the business or activity in which it was engaged at the date of the transaction, event or matter referred to.

G. As used herein, the term "detail" and the phrases "state in detail" and "describe in detail" shall mean that you are requested to state, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event and date, relating to or otherwise pertaining to the matters inquired of in said interrogatory.

III. DEFINITIONS

A. As used herein, the terms "NRC," "you," or "your" and any synonym thereof and derivative therefrom are intended to, and shall, embrace and include any and all offices within the Nuclear Regulatory Commission, including NRC Staff, NRC Office of Investigations, and all their respective attorneys, agents, servants, associates, employees, representatives, investigators, and others who are or have been in possession of or may have obtained information for or on behalf of the NRC in any manner with respect to any matter pertaining to information responsive to any interrogatory question set out below as well as any and document requested below.

B. As used herein, the term "documents" includes any written, recorded or graphic matter, however produced or reproduced, of every kind and regardless of where located, including but not limited to any summary, schedule, memorandum, note, statement, letter, telegram, interoffice communication, report, diary, desk or pocket calendar or notebook, daybook, appointment book, pamphlet, periodical, work sheet, cost sheet, list, graph, chart, index, tape, record, partial or complete report of telephone or oral conversation, compilation, tabulation, study, analysis, transcript, minutes, and all other memorials of any conversations, meetings, and conferences by telephone or otherwise, and any other writing or recording which is in the possession, custody or control of the Intervenor or any

employees, representatives, attorneys, investigators, or others acting on his behalf.

C. As used herein, the terms "and" and "or" shall each mean and/or.

D. As used herein, the term Allen Mosbaugh or "petitioner" shall mean Allen Mosbaugh, the Intervenor in this proceeding.

E. As used herein, the term "SONOPCO," "Southern Nuclear" and "Southern Nuclear Operating Company, Inc.," shall be synonymous and shall refer to a former "project" associated with The Southern Company as well as a current corporate entity associated with The Southern Company.

F. As used herein, the term "date" shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

G. As used herein, the term "person" shall mean any individual, partnership, firm, association, corporation or other government, legal or business entity.

H. As used herein, the term "detail" and the phrases "state in detail" and "describe in detail" shall mean that you are requested to state, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event and date, relating to or otherwise pertaining to the matters inquired of in said interrogatory.

I. As used herein, the term "COA" shall refer to a confirmation of action letter sent by or on behalf of Georgia

Power Company to the NRC in response to the March 20, 1990 Site Area Emergency.

J. As used herein, the term "LER" or "LER 90-006" shall refer to any draft or actual licensee event report, or revision to any such report received or known to have existed by NRC that in any way pertains to the March 20, 1990 Site Area Emergency.

IV. INTERROGATORIES

Below petitioner sets forth interrogatory questions, which have been divided into various categories for the convenience of NRC Staff.

A. Interrogatories related to the Diesel Generators

1. What communications did any NRC personnel receive from any GPC personnel informing them of any inaccuracy or potential inaccuracy in the Confirmation of Action letter ("COA") concerning the March, 1990 Site Area Emergency or with respect to LER 90-006?

a. For each such communication, state the time, date, name of individual communicating the information, and the sum and substance of the communication.

b. For each such communication, produce any and all documents relating to any such communication.

2. State in detail any knowledge or involvement Ken Brockman, Stewart Ebnetter, the resident inspectors, and any other NRC employee had with respect to inaccurate or potentially inaccurate information contained in the COA or LER 90-006.

a. For each describe in detail:

- i. The nature of each communication.
- ii. The date of each communication.
- iii. All personnel involved.
- iv. Any notes or records from each communication.
- v. From whom each communication was received.

b. For each such communication, produce any and all documents related to said involvement.

3. Who did the NRC interview regarding the alleged false statements in the COA and the LER?

a. For any such interview conducted, describe in detail:

- i. The identity of each person interviewed.
- ii. The date each interview took place.
- iii. What was discussed in each interview.
- iv. Any notes or records from the interview.

4. Was the oral presentation of George Bockhold, to Region II on April 9, 1990, regarding the number of successful starts of the Vogtle diesel generators A and B, relied upon by the NRC in lifting the hold imposed by NRC on Vogtle Unit 1 power operations?

a. Please state why it was or was not relied upon.

5. With respect to the oral presentation of George Bockhold, to Region II on April 9, 1990, describe in detail:

- a. Who was present at the oral presentation.
- b. Any recollection of comments made during the presentation.

c. Produce any and all documents and notes prepared with respect to or which relate to said presentation.

d. Please identify any and all specific statements of George Bockhold that were relied upon in the decision to lift the hold.

6. Was the April 9, 1990 Confirmation of action letter signed by George Hairston, relied upon by the NRC when deciding to lift the hold on the Vogtle Unit 1 power operations?

a. If the answer is yes, describe or identify the specific statements contained the COA letter which the NRC relied upon for that decision.

7. Is it permissible for a licensee to establish Diesel Generator reliability through "non-valid tests" under any provisions set out in the code of federal regulations; Branch Technical Position EICSB 2 Diesel Generator Reliability Qualification Testing; Regulatory Guide 1.106; Generic Letter 84-15; or any other NRC regulations and guidance?

a. If the answer is yes (or a qualified yes) with respect to any source stated above:

i. identify any and all specific provision(s) providing; and

ii. provide a detailed statement setting forth the reason(s) why.

8. At the time that the hold on Vogtle Unit 1 was lifted after the Site Area Emergency, was it the NRC's understanding

that the diesel start data presented in the oral presentation and stated in the COA was not based on "valid tests"?

a. State in detail exactly what was the NRC's understanding with respect to whether the COA and oral presentation was or was not based on "valid tests" when it reviewed LER 90-006 on April 19, 1990.

9. Was it the NRC's understanding that the "successful start" and "starts without problems or failures" data contained in the April 9, 1990 presentation, the COA and the LER 90-006, referred to consecutive starts?

10. After the failure of the diesel generator system caused the March 20, 1990 Vogtle Site Area Emergency, Did the NRC question the reliability of the diesel generators?

a. If the answer is yes, was the licensee required to "requalify" the diesel generators per Regulatory Guide 1.106?

i. If the answer to this subpart is no, please state why not.

11. How did Vogtle re-establish the NRC required 95% per diesel generator reliability goal before the NRC gave permission to resume power operations?

12. Under NRC regulations, how many consecutive successful starts of Vogtle's Diesel generators were required to re-establish the necessary reliability and to grant permission to resume power operations?

13. Might the fact that only 2 or 3 valid tests of each of the plant Vogtle diesels were conducted by GPC prior to GPC's requesting permission to resume power operations have effected the NRC's decision to grant that request?

14. Was the NRC promptly informed by GPC that Vogtle's Unit 1 diesel generator tripped seven (7) times on May 23, 1990 by the same CALCON switches that were suspected of causing the March 20, 1990 Site Area Emergency?

a. If NRC was ever informed, please state:

i. the date;

ii. the time of the contact;

iii. the individual(s) within the NRC who were contacted.

15. Did the NRC order Vogtle shut down after multiple repeat failures of the diesel generator was caused by the CALCON switches after the plant resumed operation?

a. If the answer is no, please state why not.

16. Does NRC consider diesel control air quality to be "satisfactory" for plant Vogtle where the dew point is above 50 degrees F, as described in GPC's response to Generic Letter 84-15 issued by NRC?

17. Was the information contained in the COA letter regarding diesel control air dew points partially relied upon by the NRC when NRC decided to lift the hold on power operations imposed after the March 20, 1990 Site Area Emergency?

18. Does NRC consider operational history of the Vogtle diesel generators which includes prolonged periods where the air system dryers are out of service to be satisfactory?

a. Produce all documents NRC has concerning the operational history of the Vogtle diesel generators.

19. Did NRC know that diesel control air dew point was above the limit of acceptable operation (pre-GPC response to the Generic Letter) because the dryers were again out of service during the days proceeding and following the 4-9-90 presentation by GPC in response to the Site Area Emergency?

a. If not, would this information have been considered material to the decision making process of the NRC with respect to the resumption of power operation after the Site Area Emergency?

20. Did the NRC interpret the following statement made by GPC to NRC prior to the resumption of power operation after the Site Area Emergency: "Initial reports of higher than expected dewpoints were later attributed to faulty instrumentation" to mean that the unacceptably high dewpoints reported in the days prior to and on 4-9-90 resulted from readings of faulty measuring device(s) and that the actual control air dewpoints were within specification (i.e., less than 50 degrees F)?

21. Did the NRC consider GPC's assertion that "Initial reports of higher than expected dewpoints were later attributed to faulty instrumentation" to be material to NRC's deliberative process when NRC decided to lift the hold on power operations?

B. Interrogatories related to FAVA

22. Did the NRC Staff verify that GPC complied with any of the four stipulations stated on page 49 of the Partial Director's Decision to 10 CFR 2.206 (DD-93-08)?

a. If yes, identify which stipulations GPC allegedly complied with and:

- i. identify and produce all documents, interviews, and communications upon which the NRC based its determination that GPC complied with this verification;
- ii. state whether NRC considered the verification process to be adequate or inadequate;
- iii. state the basis for each such determination.

b. If NRC determined that GPC complied with stipulation 2 (i.e., that the hoses from the FAVA system conform with Reg. Guide 1.143), in addition to stating the basis of this determination, state how such a determination was reached in light of the hose manufacturer's statement that it could not verify conformance of the hoses with Reg. Guide 1.143.

c. If NRC determined that GPC complied with stipulation 4, did the licensee determine that the auxiliary radwaste building would or would not leak; and if it would leak, what sort of design changes would be required to reduce the risk of leakage against spays from a hose hitting the walls?

d. Did the licensee determine where off-site leakage would run in the event of leakage from the FAVA system, and if so, what was the licensee's determination. In this respect, state whether the licensee evaluated the leakage path to Little Beaver Creek in the FSAR, and if so, what did that evaluation determine; and did NRC determine whether this evaluation was adequate?

e. If the answer is yes, did licensee's August 1990 safety evaluation adequately evaluate the auxiliary radwaste building leakage path and, if so, describe why it did or did not.

f. Produce all documents NRC received from GPC or SONOPCO regarding FAVA, including all notes or other materials prepared by NRC in response to any communication received from GPC or SONOPCO.

23. Was the licensee's safety evaluation of FAVA adequate to exempt it from all the NRC's 10 C.F.R. 50, App. B, Quality Assurance requirements for a safety related system?

a. If the answer is yes, state in detail the basis for reaching this conclusion.

24. Do any NRC requirements and regulations permit the use of a 10 C.F.R. 50.59 safety evaluation to exempt safety related systems, structures, and components from the 17 Quality Assurance criteria of 10 CFR 50 App. B?

a. If the answer is yes:

i. delineate those requirements and regulations;

- ii. state how those requirements are applied to the Quality Assurance criteria through a 50.59 Safety evaluation; and
- iii. give the justification for their use.
- iv. state whether the level of justification the NRC normally requires under 10 CFR 50.59 (a)(2) would be sufficient, and if responding in the affirmative, state the basis for reaching this conclusion.

25. Describe in detail the NRC's understanding of the safety evaluation licensee performed on FAVA.

a. State whether this safety evaluation complied with ASME requirements and explain why it did or did not.

26. Do any NRC requirements and regulations permit the use of a 10 C.F.R. 50.59 safety evaluation to exempt safety related systems, structures, and components from all ASME code requirements?

a. If the answer is yes (or a qualified yes), state the required justifications for such a 50.59 safety evaluation?

b. If the answer is yes (or a qualified yes), state whether the level of justification the NRC normally requires under 10 CFR 50.59 (a)(2) would be sufficient?

c. If the answer is yes (or a qualified yes), was the licensee's safety evaluation on FAVA adequate to exempt it

from the imposed ASME requirements for a safety related radwaste system?

27. Did the NRC staff review or investigate the allegation that Ron LeGrand was notified by an employee of the licensee that the FAVA system violated NRC requirements before it was initially installed?

a. If so, state who performed the review, and describe in detail:

- i. the extent of NRC Staff review;
- ii. whether the review was completed and if not, why;
- iii. the specific findings of any such review.
- iv. Produce any and all documents related to any such review or investigation.

b. If not, state why.

28. Did the NRC Staff review Petitioner's allegation that 10 CFR part 21 reporting requirements and procedures regarding the FAVA system were violated.

a. If the answer is yes or a qualified yes, identify all documents, interviews, and communications created during such a review, and produce any and all such documents.

29. Did NRC staff ever issue a notice of violation with respect to deficiencies in either the installation, operation, or safety evaluation of the FAVA system?

- a. If the answer is no or qualified in any manner, state in detail the basis for not issuing a notice of violation.

30. Did NRC investigate the allegation made by Allen Mosbaugh in 1990 that Vogtle's procurement policy failed to apply 10 C.F.R. Part 21 requirements to procurement activities related to security, radwaste and fire protection systems as required under NUREG 302 and Plant Procedure 81010-C?

- a. If yes, what conclusions were drawn?
- b. If no, why not?

C. Interrogatories related to Miscalculation of Shutdown Margin

31. In the Directors Partial Decision at page 35, it states: "The inspectors reviewed the GPC's deficiency card program and found it to be adequate; they could find no other instances of failure to write a deficiency card."

- a. If this is correct, identify and produce:
 - i. all documents, communications, interviews, and all other forms of review the inspectors used to make this determination.

b. If this is correct, explain in detail how did the inspectors account for the fact that no deficiency card was written for the 1988 dilution valves violation until the petitioner caused one to be written in 1989, over one year later.

c. Please set forth the scope of the review, who performed it, and describe in detail any interview(s) or

other forms of review the inspectors used to perform said review.

d. How did the inspectors account for the fact that no deficiency card was written for the excessive vibration and failure of the RHR pump motor cooling line?

e. When reviewing GPC's deficiency card program, did the NRC ask GPC personnel if they were having difficulty requiring employees to write deficiency cards?

i. If the answer to this subpart is yes, provide a detailed account of any such conversations or communications including dates they took place, and the identity of persons questioned, and produce any and all documents related thereto.

f. Did the inspectors ask any personnel working in GPC's NSAC group if there were problems with personnel not writing deficiency cards?

i. If the answer to this subpart is yes, provide a detailed account of any such conversations or communications including dates they took place, and the identity of persons questioned, and produce any and all documents related to thereto.

g. Did the inspectors ask the Vogtle resident NRC inspectors if they had ever expressed concerns that personnel had failed to write deficiency cards?

i. If the answer to this subpart is yes, provide a detailed account of any such conversations or communications including dates they took place, and the identity of persons questioned, and produce any and all documents related thereto.

h. Did the inspectors review the monthly resident inspector reports for comments about failures to write deficiency cards?

i. If the answer to this subpart is yes, state the dates, comments and authors of any such entries, and produce any and all documents related thereto.

D. Interrogatories related to Safeguards

32. What did GPC identify as the root cause for the failure to adequately protect and secure the Safeguards materials in the "Unlocked File Cabinet" of Mr. Prestifillipo which resulted in a Level III violation and \$50,000 civil penalty issued in 1990?

33. How did the NRC discover that GPC violated the NRC's one hour red phone reporting requirement for the "second event"?

34. Did the NRC's discovery that GPC violated the NRC's one hour red phone reporting requirement for the "second event" identified on page 45 of the Director's Partial Decision come about as a result of GPC corrective action to a previous

violation or did it come about as a result of allegations raised by Allen Mosbaugh to the NRC?

35. Did GPC's failure to timely report the second violation substantially change the character of the regulatory concern from the original level III violation where the GPC did promptly report a violation?

36. Is there a regulatory difference between a licensee's management passively, as opposed to actively, impeding the making of a report where the impeding causes the violation of NRC requirements?

a. If the answer is yes or a qualified yes, did GPC's management "passively" impede conformance with the one hour reporting requirement?

37. Is it NRC policy not to issue a Notice of Violation for a violation of NRC requirements where the violation was not caused by the same act for which the initial notice of violation was previously issued?

38. Does the NRC tape record enforcement conferences?

a. If yes, did the NRC tape record the enforcement conference with GPC on May 22, 1990?

i. If the answer to this subpart is no, state why this particular enforcement conference was not recorded.

39. State the identities of the individuals who attended the enforcement conference with GPC on May 22, 1990?

b. For any participant who is or was an employee of the NRC, state whether that participant to the enforcement conference can recollect whether Ken McCoy attended the enforcement conference and whether he made a statement about the kind and status of the safeguard controls in GPC's corporate office?

i. If so, state the best recollection of the NRC employee with respect to what Ken McCoy stated about the kind and status of safeguard controls in GPC's corporate office.

Specifically, state whether any individual recalls Ken McCoy stating anything to the effect that: "We have reviewed the controls in corporate--Birmingham and safeguards documents there are all controlled by document control under a sound program."

ii. If anyone recalls Ken McCoy making such a statement, would this statement be accurate in light of the subsequent finding of numerous uncontrolled and unsecured safeguards documents in Birmingham?

c. Did the fact that "uncontrolled" as well as "unsecured" documents were found in Birmingham change the character of the regulatory concern? In what ways?

d. Did the fact that these documents were found outside a "protected area" change the character of the

regulatory concern from the original level II violation which occurred within a "protected area"?

e. Would the fact that safeguard documents were found outside a "protected area" be considered significant to the regulatory process and the discussion at the 5-22-90 enforcement conference?

E. Interrogatories Related to Dilution Valves

40. Under NRC regulations and enforcement criteria, could a licensee employee be subjected to a fine and/or jail term for the "incorrect interpretation" of a Technical Specification?

41. How many valves, normally required be Technical Specifications to be locked closed, did GPC claim were locked closed with paper hold tags?

42. Within how much time must a licensee take actions required by Technical Specifications that specifically state that the licensee must take "immediate action"?

43. How much time elapsed before GPC complied with the Technical Specification Immediate Action Statement after they were informed by the NRC of their failure to comply with Technical Specifications?

a. Was this amount of time acceptable and in conformity with NRC regulations?

i. If not, state what action NRC has taken, and if no action was taken, state the reason why.

F. Miscellaneous Interrogatories

44. Has the NRC ever received any information or in any way investigated any alleged false statements made by Ken McCoy before he became associated with the Southern Nuclear Operating Company?

a. If the answer is yes, state in detail the facts related to the allegation, and produce any and all documentation related to the investigation/allegation.

45. Did any former regional administrator for Region II, ever state to anyone at NRC or take any action indicating that he believed Ken McCoy had made an intentional false statement?

a. If the answer is yes, state in detail the circumstances and facts pertaining to Mr. O'Riely's statement, and identify and produce any and all documents related to Mr. O'Riely's statement or concern.

b. If the answer is yes, state whether any action was threatened or taken by the NRC regarding the above.

46. As the result of any action (or inaction) taken by Ken McCoy in the past, did the NRC ever threaten or insinuate to a prospective or current licensee that the NRC may not issue a license unless Ken McCoy was removed from the licensee's (or prospective licensee's) employ?

47. Did George Hairston or Pat McDonald ever "walk out" of a meeting of the NRC RER team at Plant Farley?

a. If the answer is yes, state in detail the events leading to this occurrence.

Has the NRC evaluated allegations raised by Allen Mosbaugh (and/or Marvin Hobby and any other source of information) to determine whether a pattern or practice exists and whether the totality of the conduct could indicate a lack of trustworthiness or other character flaw on the part of SONOPCO or GPC management?

a. If the answer is yes, what analysis was done, when was it performed and who performed this analysis. In addition, produce all documents related to any such analysis.

48. Does the NRC consider the making of a material false statement by an officer or high level manager of a licensee during the course of a proceeding brought under Section 210 or 211 of the Energy Reorganization Act to constitute improper conduct that could subject the licensee to adverse action under 10 C.F.R. §50.7 or other NRC regulation or requirement?

49. Did the NRC ever investigate whether the following discourse or similar discourse occurred in or about March 22, 1990 at a Vogtle Shift Turnover Meeting: Operations Superintendent: "We have a lot of work to do." Shift Supervisor: "It can be done if you can take the LERs"?

a. If the answer is yes, please state the results of the investigation and provide any and all documentation relating to this investigation.

50. Does the NRC consider the making of a material false statement by an officer or high level manager of a licensee during the course of a proceeding brought under Section 210 or

211 of the Energy Reorganization Act to constitute action on the part of a licensee that may adversely effect the NRC's assessment of a licensee's character, competence, trustworthiness, or other similar trait?

51. Does the NRC maintain any records of any kind on officers and high-ranking managers employed of formerly employed by GPC and/or SONOPCO?

a. If the answer is yes, please produce all such documentation.

V. REQUEST FOR DOCUMENTS

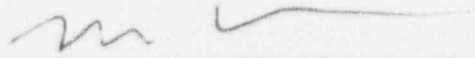
In addition to documents requested above, intervenor requests that the NRC produce any and all documents it has in its control or possession which relate to any of the following:

1. All documents concerning the March 20, 1990 Site Area Emergency and documents related to the Diesel Generator Verbal Presentation made by GPC to NRC on April 9, 1990.
2. All documents concerning the issuance of Confirmation of Action Response to the Site Area Emergency.
3. All documents concerning the issuance of LER 90-006 and any revision thereto.
4. Submission of False Information in the cover letter accompanying the Revision to the LER.
5. All documents, including interview statements obtained during the August, 1990 OSI Inspection, and any and all other interview statements obtained by NRC by anyone since 1988 (including interview statements related to Yonkers and Fuchko).
6. All documents related to NRC's investigation into allegations that GPC's submission of the response to the 2.206 Petition contained false information.

7. All documents related to McDonald's Presentation of False testimony in any DOL proceedings.
8. All documents related to the allegation that McCoy made false statements to the NRC during an enforcement Conference held at the Plant Vogtle site on May 22, 1990.
9. All documents related to allegations concerning previous false statements alleged to have been made by McCoy.
10. All documents related to any investigation or allegation related to willful violations of technical specifications.
11. All documents related to any investigation or allegation related to false statements contained in GPC's, SONOPCO's response to petitioner's 2.206 petition.
12. All documents related to GPC's/SONOPCO's failure to report safeguards violations to the NRC in a timely manner.
13. All documents related to McDonald's March 30, 1989 false statement to the Commission during discussions related to a vote on the full power operating license for Vogtle Unit 2. Specifically, related to the then Chairman's concern regarding the management structure at plant Vogtle.
14. Produce all documents that in any way relate to NRC-OI's investigation of any alleged violations of discrimination of any person stationed at or performing work related to plant Vogtle, Plant Hatch or Plant Farley, or employed by GPC, SONOPCO, Alabama Power Corporation, or any other Southern Company entity since 1988.
15. Produce any and all documents related to or that discuss Yonkers or Fuchko or any allegation raised by Yonkers and Fuchko that is in the control or possession of NRC.
16. Produce and identify any and all documents reviewed during the course of responding to the interrogatory questions stated above.

[signature on next page]

Respectfully submitted,



Michael D. Kohn
KOHN, KOHN AND COLAPINTO
517 Florida Avenue, N.W.
Washington, D.C. 20001-1850
(202) 234-4663

Attorney for Intervenor

Dated: June 24, 1993

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

RECEIVED
USNRC

'93 JUN 30 11:13

Before Administrative Judges:

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

CERTIFICATE OF SERVICE

I hereby certify that on June ²⁷~~24~~, 1993 Intervenor's First
Set of Interrogatories and request for Documents to NRC Staff was
served by 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. Barth, Esq.
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

[continued on next page]

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

John Lamberski, Esq.
Troutman Sanders
Suite 5200
600 Peachtree Street, N.E.
Atlanta, GA 30308-2216

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

By: 

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