

14148

RELATED CORRESPONDENCE

REC'D
NRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'93 JUL 27 P3:03

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKET NO. 50-424-OLA-3
DOCKET NO. 50-425-OLA-3
ASLBP NO. 93-671-01-OLA-3

In the Matter of *
*
GEORGIA POWER COMPANY, * Docket Nos. 50-424-OLA-3
et al. * 50-425-OLA-3
*
(Vogtle Electric * Re: License Amendment
Generating Plant, * (Transfer to Southern
Units 1 and 2) * Nuclear)
*
* ASLBP No. 93-671-01-OLA-3

GEORGIA POWER COMPANY'S
SECOND SET OF INTERROGATORIES
AND REQUEST FOR DOCUMENTS TO ALLEN L. MOSBAUGH

I. INTRODUCTION.

Pursuant to 10 C.F.R. § 2.740b, Georgia Power Company hereby requests that Allen L. Mosbaugh answer the following interrogatories in writing and under oath within 14 days of service of this document.

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.

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 responsive;

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 identity of a document or where the answer to the interrogatory refers to a document, state with respect to each such document:

1. The identity 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 to 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 name;

2. His last known business and residence addresses and telephone numbers;

3. If an individual, his 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 phrases "state in detail" and "described 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 "Intervenor", "you," or "your" and any synonym thereof and derivative therefrom are intended to, and shall, embrace and include Intervenor Allen L. Mosbaugh and counsel for Intervenor and all their respective agents, servants, associates, employees, representatives, private investigators, and others who are or have been in possession of or may have obtained information for or on behalf of Intervenor in any manner with respect to any matter referred to in the Petition.

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 "NRC" shall mean the U.S. Nuclear Regulatory Commission, an agency of the Federal Government.

E. As used herein, the term "Petition" shall mean the Petition to Intervene and Request for Hearing, dated October 22, 1992, filed by Intervenor in this proceeding.

F. As used herein, the term "Amended Petition" shall mean the Amendments to Petition to Intervene and Request for Hearing, dated December 9, 1992, filed by Intervenor in this proceeding.

G. As used herein, the term "GPC" shall mean the Georgia Power Company, a subsidiary of The Southern Company.

H. As used herein, the term "Southern Nuclear" shall mean the Southern Nuclear Operating Company, Inc., a subsidiary of The Southern Company.

I. As used herein, the term "SONOPCO Project" shall mean the consolidation of GPC, Alabama Power Company and Southern Company Services, Inc. personnel in Birmingham, Alabama between November 1988 and January 1991 for the management and support of the Southern system nuclear facilities.

J. As used herein, the term "Hobby/Mosbaugh Petition" shall mean the petition filed by the Intervenor and Mr. Marvin B. Hobby with the NRC relating to allegations of violations by GPC of NRC requirements, dated September 11, 1990, as supplemented by letters from Intervenor and Mr. Hobby to the NRC, dated September 21, 1990, October 1, 1990 and July 8, 1991.

K. 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.

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

IV. INTERROGATORIES

1. This interrogatory relates to the six page document which Intervenor submitted to the NRC, the first two paragraphs of which begin as follows:

***** PLEASE NOTE *****

The level of detail contained in this concern will allow the Vogtle and SONOPCO management to conclusively identify the author.

The Georgia Power Company has made two material false statements in written correspondence submitted to the NRC regarding Plant Vogtle's emergency diesel generators....

- a. On what date did Intervenor submit this document to NRC?
- b. Beside NRC, who else did Intervenor provide with a copy of this document?
- c. Describe all oral statements made by Intervenor to the NRC or any other person with respect to this document. Identify the date of such statement, who they were made to and what was discussed.
- d. Which of the 1B diesel starts listed on pages 4 and 5 of this document constitute problems or failures associated with the cause of the 1A diesel failure on March 20, 1990?
- e. Is it Intervenor's contention that the NRC would not have permitted Vogtle Unit 1 to restart

if GPC had provided NRC with the tabulation of 1B diesel starts data which appears on pages 4 and 5 of this document? If the answer is "yes," state the basis for that contention.

f. What "detailed information and source documents" were provided to Al Chaffee, referred to on page six of this document? State who provided it and when. Who else received such information and documents? From whom did they receive it and when?

g. Which of the 1B diesel starts listed on pages 4 and 5 of this document does Intervenor contend the NRC was unaware before it permitted GPC to restart Unit 1 on April 12, 1990?

h. Is it Intervenor's contention that he was never informed that the NRC was notified prior to April 9, 1990 of the failures and problems which occurred on the 1B diesel generator?

i. Does Intervenor contend that the diesel generators were not operable when NRC approved the restart of Unit 1 on April 12, 1990? If the answer is "yes," state the basis for this contention.

j. Is it Intervenor's contention that prior to being permitted to restart Vogtle Unit 1 on April 12, 1990 GPC should have been required to replace the diesel control systems with a system of a different design which did not use Calcon sensors? If the answer is "yes," state what other designs were available which GPC could have installed and how the reliability of that other system compared to the one on the diesels.

k. Did Mr. Mosbaugh ever recommend that the Vogtle diesel control systems be replaced? If the answer is "yes," state the date of each time he made such a recommendation, what each recommendation was and to whom he made each recommendation.

l. Does Intervenor contend that during the course of the IIT review of the March 20, 1990 site area emergency, the NRC's Al Chaffee did not receive information such that he had all the same data possessed by GPC concerning the diesel generator problems and failures?

m. Is it Intervenor's contention that prior to restarting Vogtle Unit 1 following the March 20, 1990 site area emergency GPC was required to

either demonstrate that the diesel generators were requalified and/or met a reliability factor of 95% in accordance with Reg. Guide 1.108? If the answer is "yes," describe in detail what GPC was required to demonstrate and state the basis for such contention and quote the specific NRC regulations or requirements which support that contention.

2. This interrogatory refers to the six page document which Intervenor submitted to the NRC, the first paragraph of which begins as follows:

Georgia power has made an additional Material false statement in written correspondence to the NRC in Licensee Event Report 90-006 submitted 4-19-90.

- a. On what date did Intervenor submit this document to NRC?
- b. Beside NRC, who else did Intervenor provide with a copy of this document?
- c. Describe all oral statements made by Intervenor to the NRC or any other person with respect to this document. Identify the date of such statement, who they were made to and what was discussed.
- d. With respect to the sentence at the bottom of page one of this document which begins "Concern

was raised by plant staff on 4-18-90...," respond to the following:

1. Identify each individual by name, including those who were raising the concerns and to whom they were raised.
 2. State whether Mr. Mosbaugh was present during each occasion when a concern was raised and whether he tape recorded the conversation.
 3. Describe in detail what the concern was that raised in each instance, including the specific language of the LER to which the concern related.
 - e. Has Mr. Mosbaugh ever seen a list of diesel starts prepared by either Mr. Tom Webb or Mr. Rick Odom? Did Mr. Mosbaugh ever have such a list in his possession custody or control? If the answer is "yes" to either, describe the list in detail and state in detail Mr. Mosbaugh's knowledge of the location and disposition of the list since its creation.
3. This interrogatory relates to the document Intervenor submitted to the NRC and which is entitled "Georgia Power/SONOPCO 2.206 Petition Response is filled with lies?"

- a. On what date did Intervenor submit this document to NRC?
- b. Beside NRC, who else did Intervenor provide with a copy of this document?
- c. Describe all oral statements made by Intervenor to the NRC or any other person with respect to this document. Identify the date of such statement, who they were made to and what was discussed.
- d. The bottom of page six of this document states "[c]learly Shipman and Stringfellow proceed to inform Hairston of what they have been told by Allen Mosbaugh." Describe in detail the facts on which this statement is based.
- e. Other than the statements of Messrs. Shipman and Stringfellow which appear on pp. 4-5 and 8 of this document, is Intervenor aware of any other statements made by GPC personnel other than Mr. Mosbaugh and made on or before April 19, 1990 concerning the accuracy of the April 9, 1990 letter? If the answer is "yes," describe the statements in detail and identify who made them, when they were made, to whom they were made,

whether Mr. Mosbaugh was present and, if so,
whether he tape recorded the conversations.

4. This interrogatory relates to document Intervenor submitted to the NRC and which is entitled "Georgia Power/SONOPCO Response to 2.206 Petition is lies, Smoke, and Mirrors?"

- a. On what date did Intervenor submit this document to NRC?
- b. Beside NRC, who else did Intervenor provide with a copy of this document?
- c. Describe all oral statements made by Intervenor to the NRC or any other person with respect to this document. Identify the date of such statement, who they were made to and what was discussed.

5. Provide responses to questions a through e below with respect to the following language from the April 9, 1990 GPC letter to NRC:

Since March 20, the 1A DG has been started 18 times, and the 1B DG has been started 19 times. No failures or problems have occurred during any of these starts.

- a. On or before April 19, 1990, in each case when Mr. Mosbaugh stated that the above language was inaccurate, identify to whom Mr. Mosbaugh was

speaking, what he said and approximately when he said it.

b. Between April 19, 1990 and April 30, 1990, in each case when Mr. Mosbaugh stated that the above language was inaccurate, identify to whom Mr. Mosbaugh was speaking, what he said and approximately when he said it.

c. When was the first time that Mr. Mosbaugh concluded that any inaccuracy in the above language was wilful? Discuss each inaccuracy separately. Identify and produce any documents which evidence Mr. Mosbaugh's conclusion.

d. When was the first time that Mr. Mosbaugh told anyone employed by GPC about his conclusion that each inaccuracy was wilful and whom did he tell? Discuss each inaccuracy separately.

Identify and produce any documents which evidence Mr. Mosbaugh's conclusion.

e. When was the first time that Mr. Mosbaugh contacted anyone employed by the NRC to report that GPC had made a material false statement with respect to the above language? When did he first inform the NRC that such material false statement

was wilful? Identify and produce any documents which evidence these communications.

f. State in detail Intervenor's understanding of how the data was compiled which formed the basis for the above statement, including a description of each document reviewed and prepared in connection with that compilation.

g. Is it Intervenor's contention that someone questioned the accuracy of the above language before the letter was signed? If the answer is "yes," identify who questioned the accuracy, when they did so, and what they said and to whom.

6. This interrogatory relates to the following language from the April 19, 1990 LER 90-006:

Subsequent to this test program, DG1A and DG1B have been started at least 18 times each and no failures or problems have occurred during any of these starts.

a. On or before April 19, 1990, in each case when Mr. Mosbaugh stated that the above language was inaccurate, identify to whom Mr. Mosbaugh was speaking, what he said and approximately when he said it.

b. Between April 19, 1990 and April 30, 1990, in each case when Mr. Mosbaugh stated that the above

language was inaccurate, identify to whom Mr. Mosbaugh was speaking, what he said and approximately when he said it.

c. When was the first time that Mr. Mosbaugh concluded that any inaccuracy in the above language was wilful? Discuss each inaccuracy separately. Identify and produce any documents which evidence Mr. Mosbaugh's conclusion.

d. When was the first time that Mr. Mosbaugh told anyone employed by GPC about his conclusion that each inaccuracy was wilful and whom did he tell? Discuss each inaccuracy separately.

Identify and produce any documents which evidence Mr. Mosbaugh's conclusion. Identify any documents which evidence these communications.

e. When was the first time that Mr. Mosbaugh contacted anyone employed by the NRC to report that GPC had made a material false statement with respect to the above language? When did he first inform the NRC that such material false statement was wilful? Identify and produce any documents which evidence these communications.

f. Did Mr. Mosbaugh tell anyone on April 19, 1990 that further verification of the diesel start

data was necessary before the above language could be included in the LER? If the answer is "yes," who did he tell.

g. What was Mr. Mosbaugh's understanding on April 19, 1990 of the meaning of the term "subsequent to this test program" as it was used in LER 90-006?

h. Was Mr. Mosbaugh aware on April 19, 1990 of any failures or problems with respect to the diesel generator starts which occurred "subsequent to this test program?" If the answer is "yes," identify the diesel starts and state who, if anyone, Mr. Mosbaugh notified of these problem starts or failures and when.

7. If, subsequent to the issuance of LER 90-006 on April 19, 1990, Mr. Mosbaugh provided Plant Vogtle personnel with a revision to that LER, what did the revision say with respect to the diesel starts information quoted in interrogatory no. 1 above? When did Mr. Mosbaugh provide such a revision and to whom? Produce any documents evidencing such revision, if different than Exhibit 1 attached hereto.

8. Describe in detail the data sources concerning diesel generator starts which was reviewed by Mr. Mosbaugh between April 9 and April 19, 1990. State when each discrete document was reviewed by Mr. Mosbaugh. Produce copies of each document.

9. State when Mr. Mosbaugh completed the tabulation of starts for the 1B diesel generator which Mr. Mosbaugh attached to his April 30, 1990 memorandum to Mr. Bockhold, a copy of which is attached as Exhibit 2. If prior to April 30, 1990, when was the first time he provided that tabulation to Mr. Bockhold?

10. With respect to the 1B diesel, which diesel starts does Mr. Mosbaugh consider "successful starts" of those starts that occurred between March 20, 1990 and April 9, 1990?

11. With respect to the 1A diesel, which diesel starts does Mr. Mosbaugh consider "successful starts" of those starts that occurred between March 20, 1990 and April 9, 1990, inclusive?

12. State whether Mr. Aufdenkampe's actions on April 19, 1990 in connection with his review and concurrence of the

final language of the LER 90-006 constituted willful misconduct, including careless disregard.

13. Describe in detail the specific events and knowledge of GPC employees concerning the diesel starts statement in the final April 19, 1990 LER which Intervenor contends will be corroborated by Mr. Aufdenkampe?

14. Does Intervenor contend that Mr. Aufdenkampe did not agree with the final language of the April 19, 1990 LER?

15. Does Intervenor contend that Mr. Hairston was a party to the telephone conversation late on April 19, 1990 when Messrs. Aufdenkampe and Shipman concurred on the final language of the April 19, 1990 LER? If the answer is "yes," what is the basis for that contention?

16. Explain the rationale for Mr. Mosbaugh's selection of each of the excerpts contained on the Six Tapes.

a. Why did Mr. Mosbaugh exclude from the Six Tapes certain of the conversations which he taped on April 19, 1990 and during which LER 90-006 was discussed?

17. State whether the four-page document attached as Exhibit 13 to Mr. Mosbaugh's May 1991 Motion for Summary Decision in Mosbaugh v. GPC, DOL Case No. 91-ERA-11, is the document which Intervenor provided to the NRC's Larry Robinson on June 13, 1990. If the answer is "no," produce a copy of the document which was provided to Mr. Robinson on June 13, 1990.

18. This interrogatory relates to Intervenor's Response to the First Request for Documents by Georgia Power Company, dated June 2, 1993.

a. Identify the shift supervisor(s) referred to in item B.5 on page 16 and the dates of each interview.

b. With respect to item 2 on pp. 17-19, respond to the following:

(1) Explain the basis for the statement on the bottom of page 18 that the April 9, 1990 letter was required to be approved by the Plant Review Board before it was signed.

(2) Did Mr. Mosbaugh receive a draft of the April 9, 1990 letter for review before it was signed? If the answer is "yes," did he provide any comments, and, if so, what were

those comments and to whom were they provided?

c. With respect to item 3 on pp. 19-21, respond to the following:

(1) Does Intervenor contend that GPC did not notify the NRC prior to the end of June, 1990 that LER 90-006 contained erroneous information concerning the diesel generator starts?

(2) Does Intervenor contend that before LER 90-006 was signed Intervenor or anyone else knew there "had not been 18 successful starts without failures or problems since the completion of the comprehensive test program?" If the answer is "yes," identify who knew, when they knew it, how they knew it and who they told about it.

(3) Does Intervenor contend that he and Mr. Aufdenkampe told Mr. Stringfellow that the final LER language was a "material false statement" because there "had not been 18 successful starts without failures or problems since the completion of the comprehensive test program?"

(4) With respect to item F on page 20 and the next two sentences, do they relate to the final language of LER 90-006 which is quoted in interrogatory 6 herein?

(5) With respect to the paragraph immediately preceding "G-L" on page 20, was that statement by Messrs. Stringfellow and Shipman tape recorded by Mr. Mosbaugh? If not, what other statements on April 19, 1990 relevant to Mr. Mosbaugh's allegations concerning LER 90-006 were not tape recorded, who made them and described in detail each statement?

d. With respect to item 4 on pp. 21-23, what is the basis of Intervenor's contention that Mr. Hairston knew that the cover letter for the June 29, 1990 revised LER contained false information.

e. With respect to the last sentence on page 22, who were the GFC officials who met with the NRC Commission on June 9, 1990?

f. Was Mr. Mosbaugh present when Mr. McCoy made the statement referred to on the top of page 23? If he was, did he tape record it? If he was not,

who was, and how did Intervenor learn of the statement?

g. With respect to item 6 on pp. 25-26, respond to the following:

(1) Does Intervenor contend that

Mr. Aufdenkampe did not direct members of his staff to do an independent review of the diesel starts data on April 19, 1990?

(2) Does Intervenor contend that

Mr. Aufdenkampe did not inform Mr. Shipman that the final language of the LER was acceptable? If the answer is "yes," did any other site personnel advise the corporate office that the final LER language was acceptable? If so, who, what did they say and to whom?

(3) Produce the June 1991 written allegation referenced in item D. on page 26.

h. With respect to tape recorded statements quoted on page 29 of this document, which current or former GPC personnel other than Allen Mosbaugh does Intervenor believe will corroborate Intervenor's characterization of these statements?

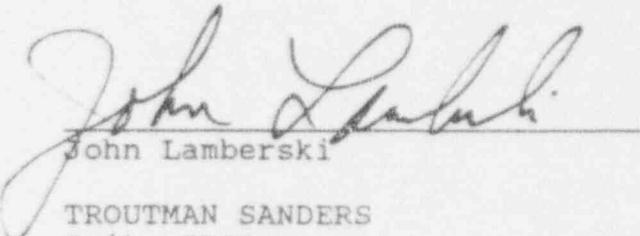
19. With respect to Mr. Mosbaugh's testimony before the Senate Subcommittee on Clean Air and Nuclear Regulation on July 15, 1993, produce all notes and other documents referred to by Mr. Mosbaugh during his testimony.

20. Identify all of the current or former GPC, Southern Nuclear, or Southern Company Services employees who Intervenor (including Intervenor's counsel) has contacted since October 22, 1992 concerning this proceeding and state which of those individuals Intervenor may call as a witness in this proceeding. Produce any documents relating to such contacts.

21. Identify each person employed by an owner of Plant Vogtle who has been contacted by Intervenor since October 22, 1992 concerning this proceeding and state which of those individuals Intervenor may call as a witness in this proceeding. Produce any documents relating to such contacts.

22. With respect to the allegations of an illegal license transfer from GPC to Southern Nuclear, produce all documents which Intervenor claims are evidence of such illegal transfer.

Dated: July 26, 1993.


John Lamberski

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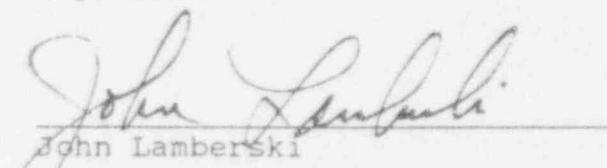
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of *
*
GEORGIA POWER COMPANY, * Docket Nos. 50-424-OLA-3
et al. * 50-425-OLA-3
*
(Vogtle Electric * Re: License Amendment
Generating Plant, * (Transfer to Southern
Units 1 and 2) * Nuclear)
*
* ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

This is to certify that copies of the within and foregoing "Georgia Power Company's Second Set of Interrogatories and Request for Documents to Allen L. Mosbaugh" were served on all those listed on the attached service list by depositing same with an overnight express mail delivery service.

This is the 26th day of July, 1993.


John Lamberski

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

In the Matter of *

GEORGIA POWER COMPANY,
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(Vogtle Electric
Generating Plant,
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* Docket Nos. 50-424-OLA-3
* 50-425-OLA-3
* Re: License Amendment
* (Transfer to Southern
* Nuclear)
* ASLBP No. 93-671-01-OLA-3

SERVICE LIST

Administrative Judge
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U.S. Nuclear Regulatory
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Washington, D.C. 20555

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Director,
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Department of Natural
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Suite 1252
Atlanta, Georgia 30334

ALMIS REWRITTEN

Numerous sensor calibrations (including jacket water temperatures), special pneumatic leak testing, and multiple engine starts and runs were performed under various conditions. In addition, the control systems for both engines were subjected to a comprehensive test program. After completion of the control logic test sequence, an under voltage test was performed. Including the under voltage test each engine has been successfully started eleven times with no start failures.

From

ALLEN MOSBAUGH

To George Bachhold

4-30-90

I have attached the start data for 1B Diesel Generator since 3-20-90. There are problems with operations logs of starts as noted. I believe that previous statements made to the NRC regarding 1B Diesel starts were incorrect in light of this data. Please advise of what action you want to take.

AMERICAN
TELETYPE

Allen

Since 3-20

UG 1D

Start	Date	Time Start	End	Comments
1	3-21-90	21:49	—	DG <u>failed</u> to start
2	3-21-90	21:56	—	DG <u>failed</u> to start
3	3-21-90	22:02	22:17	
4	3-21-90	22:59	23:01	DG stopped manually due to low LO pressure & hi FO OP
5	3-21-90	23:14	23:18	DG stopped manually due to h. FO OP
6	3-22-90	00:17	00:23	
7	3-22-90	04:28	04:29	
8	3-22-90	07:14	07:30	
9	3-22-90	08:54	08:57	
10	3-22-90	09:21	09:26	~
11	3-22-90	09:50	09:55	
12	3-22-90	10:02	10:11	
13	3-22-90	11:05	12:44	DG <u>tripped</u> on H. Lo Temp.
14	3-23-90	05:09	12:02	Received BG fault 1B in relay on start
15	3-23-90	17:30	17:33	DG <u>triggered</u> on Lo Jack H ₂ O pressure/Turboloop
16	3-23-90	17:44	22:21	
17	3-24-90	00:48	01:21	Received DG 1B trip & jack H ₂ O history alarm. DG <u>not</u> have triggered but did not
18	3-27-90	16:49	18:22	
19	3-27-90	19:09	20:09	
20	3-27-90	19:51	19:54	
21	3-27-90	19:57	19:59	
22	3-27-90	20:04	20:10	
23	3-27-90	22:20	23:17	Last Control Logic Test DG 1B Undervoltage Test

EXHIBIT 22PAGE 2 OF 3

24	2	3-28-90	04:03	05:37	ST 14980
25	3	3-27-90	13:50	13:55	
26	4	3-28-90	13:56	14:00	IB DG declared operable
27	5	4-4-90	16:32	17:44	
28	6	4-5-90	00:30	00:35	Final Test DCP 133
29	-	4-5-90	03:07	05:09	ST 14980

Conf Letter Response

30	P	4-10-90	01:37	03:29	ST 14980
31	9	4-12-90	10:20	12:32	ST 14980
32	10	4-16-90	00:00	02:00	ST 14980
33	11	4-18-90	07:59	09:34	ST 14980

LER submittal

EXHIBIT 22

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