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

'94 MAY 25 P3:35

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

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Re: License Amendment  
(transfer to Southern Nuclear)

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

INTERVENOR'S PROPOSED AGENDA  
FOR MAY 26, 1994 STATUS CONFERENCE

In response to the Atomic Safety and Licensing Board's order of May 16, 1994, Intervenor hereby respectfully request the following items be included on the agenda for the May 26, 1994 status conference:

1. The issue of whether or not NRC Staff has, in fact, released all of the Mosbaugh tapes and OI Report Exhibits to Intervenor. See exhibits A, B, and C.
2. Georgia Power Company's filing of the transcripts for tapes No. 57 and 58 to the ASLB.
3. The date for completion of Phase II discovery.
4. The need to move documents produced by Georgia Power Company maintained in Atlanta to Washington, D.C. Intervenor does not have reasonable access to these documents. Intervenor requested Licensee to relocate these documents to its Washington, D.C. counsel's office and Licensee refused. Intervenor seeks to

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have these documents transferred to Washington, D.C. See exhibits D and E.

Respectfully submitted,



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

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KOHN, KOHN, & COLAPINTO, P.C.  
ATTORNEYS AT LAW

517 FLORIDA AVENUE, NW  
WASHINGTON, DC 20001-1850  
(202) 234-4863 • FAX (202) 462-4145

MICHAEL D. KOHN \*\*\*  
STEPHEN M. KOHN \*\*\*  
DAVID K. COLAPINTO \*\*\*

OF COUNSEL:  
E. COOPER BROWN -  
ANNETTE R. KRONSTAOT \*  
DANIEL I. OSHTRY \*\*\*

\* ADMITTED IN DC  
\* ADMITTED IN VA  
\* ADMITTED IN MA  
\* ADMITTED IN NJ  
\* ADMITTED IN PA

May 18, 1994

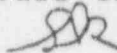
Charles A. Barth, Esq.  
Office of the General Counsel  
One White Flint North  
Stop 15B18  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: License Amendment (transfer to Southern Nuclear)  
Docket Nos. 50-424-OLA-3; 50-425-OLA-3

Dear Mr. Barth,

I am writing in regard to the exhibits mentioned in the body of the OI Report. After careful review of both the OI Report and the exhibits previously made available to Intervenor, it appears that a number of the exhibits mentioned in the OI Report were not made available to Intervenor. I look forward to your making all of the exhibits available to us immediately. Because we still do not have the complete OI Report, we urge you to expeditiously make the remaining exhibits available so that the 50 day discovery window from receipt of the OI Report and exhibits will not remain open for longer than necessary.

Yours truly,



Stephen M. Kohn

cc: Service List

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Exhibit A  
1 of 1





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 20, 1994

Stephen Kohn  
Kohn, Kohn and Colapinto, P.C.  
517 Florida Avenue, N. W.  
Washington, D. C. 20001

In the Matter of  
GEORGIA POWER COMPANY, et al.  
(Vogtle Electric Generating Plant, Units 1 and 2)  
Docket Nos. 50-424-OLA-3, 50-425-OLA-3

Dear Mr. Kohn:

I have your letter dated May 18, 1994, wherein you allege that you do not have a complete copy of OI Report Case No. 2-90-020R and that you do not have a complete set of exhibits to that report. To the best of our knowledge, a complete report with the exhibits was provided to you. If you will please identify what exhibits that you believe are missing, and the reference in the OI report to these exhibits, we shall provide copies of anything that may be missing to you for inspection and copying in compliance with the Commission's Order in CLI 94-05.

I also have Mr. Michael Kohn's letter to Mr. David Lewis discussing scheduling depositions of Messrs Fredericks, Burr and Majors. In light of the confusion with respect to the transcription of depositions in the past, please advise me well in advance of any such depositions, if you do not plan to have transcripts made of those, or any other depositions. This is in accordance with *Green v. Williams*, 90 FRD 440, 441 (ED Tenn. 1981), and as a matter of courtesy.

Sincerely,

Charles A. Barth  
Counsel for NRC Staff

CC: Service List

Telefax:

S. Kohn  
J. Lamberski  
P. Bloch

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Exhibit B  
1 of 1