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ATTORNEYS AT LAW

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STEPHEN M. KOHN ***
DAVID K. COLAPINTO ***

OF COUNSEL:
E. COOPER BROWN -
ANNETTE R. KACINSTADT *
DANIEL I. OSHRY **

* ADMITTED IN DC
- ADMITTED IN MA
* ADMITTED IN NJ
* ADMITTED IN PA

May 23, 1994

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

Re: In the Matter of Georgia Power Company,
et.al. (Vogtle Electric Generating Plant,
Units 1 and 2) Dockets Nos. 50-424-OLA-3 & 50-
425-OLA-3, ASLBP No. 93-671-01-OLA-3

Dear Charles:

Thank you for your letter dated May 20, 1994 in response to my
letter of May 18th.

I have reviewed the documents which have been provided to the
Intervenor in this matter and have identified 31 tapes which Mr.
Allen Mosbaugh had provided to the NRC back in September, 1990
which still have not been returned to Mr. Mosbaugh or provided to
the Intervenor, as required, in the course of discovery in this
case.

Specifically, according to our records, the following exhibits
to the OI Report (with their corresponding tape number) have never
been produced are as follows:

<u>OI Exhibit Number</u>	<u>Tape Number</u>
77	247
81	254
83	226
85	227
89	215
93	214

9406020194 940525
PDR ADOCK 05000424
G PDR

Exhibit C
102

Page 2
Kohn/Barth

In addition to the six tapes which correspond to OI exhibits, the following other tapes have apparently never been produced by the NRC Staff to the Intervenor:

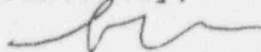
73
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Please review your records concerning this matter. If these tapes have not been produced, we expect that NRC Staff will have these materials hand delivered to my office within a 24 hour period. As I mentioned in my earlier letter to you, the Intervenor will not consider the fifty day time period to complete discovery in Phase II to commence until these materials have been produced.

Thank you in advance for your prompt consideration of this matter. I look forward to hearing from you by 11 am tomorrow morning concerning the status of these tapes.

I greatly appreciate your assistance in this matter.

Sincerely,



Stephen M. Kohn

cc: Ernest Blake, Esq.

Exhibit C
2 of 2

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May 9, 1994

Via Facsimile

Ernest L. Blake, Jr., Esq.
David R. Lewis, Esq.
Shaw, Pittman, Pitts & 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

Re: Vogtle Electric Generating Plant, Units 1 & 2
License Amendment (Transfer to Southern Nuclear)
ASLBP No. 69-671-01-OLA-3
Docket Nos. 50-424-OLA-3; 50-425-OLA-3

Gentlemen:

As counsel to Intervenor, I am formally requesting that all documents produced in response to interrogatory questions and document requests of Intervenor or NRC Staff be made available to Intervenor's counsel at the law offices of Shaw, Pittman, Pitts & Trowbridge, located at 2300 N Street, N.W., Washington, D.C. It is my understanding that this documentation is currently located at the law offices of Troutman Sanders in Atlanta, Georgia. This request is made for two reasons. First, Atlanta, Georgia has proven to be a difficult location for review of documents. Neither Mr. Mosbaugh or his counsel reside in Atlanta and the travel time, costs and inconvenience of traveling and staying in Atlanta to review documents is excessive. Second, Intervenor's counsel wishes to limit his contact with Troutman Sanders as much as possible for reasons which need not be repeated.


Exhibit D
1 of 2

Page 2
Letter of Michael Kohn
May 11, 1994

Intervenor requests that these documents be transported to Washington, D.C., as soon as possible. Intervenor also notes that is important that he and his counsel have ready access to this documentation Monday through Friday, between the hours of 9 a.m. and 5 p.m. Intervenor further requests that his counsel either be able to remove documents for photo copying at his offices or that Licensee's counsel provide Intervenor's counsel with a key counter and photo copy machine so Intervenor can make copies at his own expense.

Should you refuse this request, Intervenor will seek relief from the ASLB. As such, Intervenor requests that you respond to this request by the afternoon of May 17, 1994 so Intervenor can advise the Board of a proposed agenda item before the next scheduled conference.

Sincerely,


Michael D. Kohn

cc: Charles Barth, Esq.

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Exhibit D
2 of 2

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2300 N STREET, N.W.
WASHINGTON, D.C. 20037-1128
(202) 663-8000
FACSIMILE
(202) 663-8007

1501 FARM CREDIT DRIVE
McLEAN, VIRGINIA 22102-8004

201 LIBERTY STREET, S.W.
LEESBURG, VIRGINIA 22075-2721

DAVID R. LEWIS
(202) 663-6474

May 17, 1994

By Telecopy

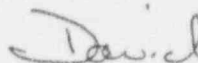
Michael D. Kohn, Esq.
Kohn, Kohn & Colapinto
517 Florida Avenue, N.W.
Washington, D.C. 20001-1850

In the Matter of
Georgia Power Company
(Vogtle Electric Generating Plant, Units 1 & 2)
Docket Nos. 50-424-OLA-3, 50-425-OLA-3

Dear Michael:

In your letter of May 9, 1994, you requested that all of the documents which we previously produced be relocated to Washington. We do not believe that relocation of these documents, many of which are originals needed in Atlanta, is reasonable or appropriate.

Sincerely,



David R. Lewis

cc: Charles Barth, Esq.

M:/0329/048DRL.94

Exhibit E
1 of 1

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* ADMITTED IN NJ
* ADMITTED IN PA

May 24, 1994

Via Facsimile

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

RE: STIPULATIONS REGARDING ILLEGAL LICENSE TRANSFER
Vogle Electric Generating Plant, Units 1 & 2
License Amendment (Transfer to Southern Nuclear)
ASLBP No. 69-671-01-OLA-3
Docket Nos. 50-424-OLA-3; 50-425-OLA-3

Dear Mr. Lamberski:

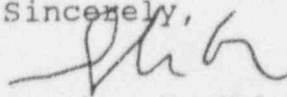
At this time Intervenor is prepared to accept some of your proposed stipulations (the language I reviewed is set out in the "CompareRite" text provided to counsel to Intervenor -- my acceptance is based on the language reflected in this document).

Intervenor accepts the following stipulations concerning illegal license transfer (identified by number):

1, 2, 3, 5, 6, 10, 11, 15, 16, 17, 18, 19,
22, 23, 25, 26, 28, 30, 33, 34, 36, 37, 39,
41, 42, 43, 44, 45, 47, 48, 49, 50, 51, 52,
53, 54, and 57.

Intervenor's counsel anticipates adopting some additional numbered stipulations after discussing some matters with counsel to Licensee.

Sincerely,


Stephen M. Kohn

cc: Service List

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