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JOHN LAMBERSKI

June 6, 1994

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VIA FACSIMILE

Michael D. Kohn, Esquire
Stephen M. Kohn, Esquire
Kohn, Kohn & Colapinto, P.C.
517 Florida Avenue, N.W.
Washington, D.C. 20001

Re: Georgia Power Company (Vogtle Electric Generating Plant, Units 1 and 2)
NRC Docket Nos. 50-424-OLA-3, 50-425-OLA 3; License Amendment for
Transfer to Southern Nuclear Operating Company

Gentlemen:

This morning, I received a facsimile from you which included Intervenor's Notice of Deposition for Messrs. Addison, Dahlberg, Beckham and Wallace (the "Notices").¹ The Notices correctly recite the dates and times when we have agreed that these depositions will occur. However, the location for Mr. Dahlberg is incorrect and should be The Southern Company offices.

I was surprised to see the Notices request that each of the deponents bring voluminous documentation to their respective depositions including (1) all documents related to meetings held since December 1987 that relate to the SONOPCO Project, Southern Nuclear, GPC's nuclear operations and budgeting process, or Southern Company's involvement with any of them, (2) all documents related to any proposed or final GPC 1989 or 1990 nuclear budget, (3) any document created or received by the deponent related to the formation of the SONOPCO Project and Southern Nuclear, including personnel decisions. This request for documents is unduly burdensome, overbroad and oppressive. Furthermore, it is unreasonable to expect the deponents to comply with this request on such short notice. None of the prior depositions on the illegal license transfer issue have involved document requests. We had no reason to anticipate them. This is the first indication that GPC has received that the deponents are to bring documents to their depositions which are scheduled to start this week. In addition, GPC and two of these deponents are currently working on responses to

¹ The certificate of service incorrectly states that the document was sent to me by facsimile on June 5, 1994.

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Michael D. Kohn, Esquire

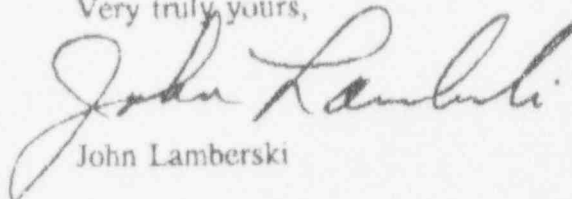
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Intervenor's Third Set of Interrogatories and/or Notice of Deposition on Written Interrogatories, which are due on June 10, 1994.

The Notices are obviously an attempt by Intervenor to circumvent the Board's prior rulings that discovery on the illegal license transfer issue is closed. Without waiving its objections to these document requests, GPC will make its best efforts to have some of the documents requested available during the depositions. In addition, the documents previously produced by GPC -- which includes documents relevant to the illegal license transfer issue -- continue to be available to Intervenor in the Atlanta offices of GPC's counsel.

Very truly yours,



John Lamberski

cc: Service List