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JOHN LAMBERSKI

June 1, 1994

OFFICE OF SECRETARY  
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VIA AIRBORNE EXPRESS

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

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

Dear Charles:

My May 13, 1994 letter identified the following NRC Staff personnel as potential deponents: Stewart D. Ebnetter, Kenneth E. Brockman, Milton D. Hunt, Peter A. Taylor, Alfred E. Chaffee, Larry L. Robinson, David B. Matthews, Ben B. Hayes and anyone else designated as a witness by the NRC Staff. Your May 18, 1994 letter to me requested that I provide a "sufficiently detailed proffer for each person of the expected factual testimony you expect to elicit from them so that we can determine whether it will be necessary to add any additional witnesses to the list we provided to the parties on May 12, 1994." On May 13, 1994 I received a letter from Mitzi A. Young, Esq. which stated that the Staff intended to proffer as a panel Messrs. Matthews, Skinner, Wheeler and Hood. I interpret your May 18th letter as requesting information respecting only Messrs. Ebnetter, Brockman, Hunt, Taylor, Chaffee, Robinson, and Hayes.

GPC believes that depositions of Messrs. Ebnetter, Brockman, Hunt, Taylor, and Chaffee will establish the level of personal knowledge possessed by each of those individuals on or before April 9, 1990 or April 19, 1990 concerning (1) the problems experienced with the Plant Vogtle 1B diesel generator following the March 20, 1990 site area emergency, (2) the significance of the problems experienced on the Plant Vogtle 1B diesel on March 22, 23, and 24, 1990, (3) the degree of reliance by NRC personnel on, and the significance of, the diesel starts statements made by GPC on April 9, 1990 and April 19, 1990, (4) the meaning of certain statements included in GPC's April 19, 1990 LER 90-006.

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Charles Barth, Esquire

June 1, 1994

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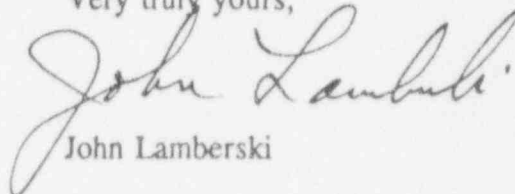
GPC believes that depositions of Messrs. Robinson and Hayes are necessary to establish the bases for the conclusions reached in OI Report in Case No. 2-90-020R, dated December 20, 1993, which was authored by Mr. Robinson and approved by Mr. Hayes.

GPC requests that each of the NRC Staff personnel discussed above be made available for depositions on a voluntary basis in lieu of the procedure described in 10 C.F.R. § 2.720(h)(2).

As you know, on March 1, 1994, GPC proposed stipulations concerning alleged GPC false statements to NRC related to the diesel generators. Depositions of one or more of the above-named NRC Staff personnel may become unnecessary if and when the NRC Staff accepts GPC's proposed diesel generator stipulations.

Thank you for your cooperation in this matter.

Very truly yours,



John Lamberski

cc: Service List