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RELATED CORRESPONDENCE

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

DOCKETED  
USNRC

'94 JUN -8 P2:58

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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  
OF LICENSING & SERVICE  
BRANCH  
Re: License Amendment  
(transfer to Southern Nuclear)  
ASLBP No. 93-671-01-OLA-3

INTERVENOR'S NOTICE OF DEPOSITION OF ED ADDISON

Intervenor, pursuant to 10 C.F.R. §2.740a(a), hereby provides notice that commencing at 10:00 am, June 9, 1994, counsel for Intervenor will take the deposition upon oral examination of Ed Addison at the Troutman Sanders law offices.

The witness is directed to bring with him all materials in his immediate control or possession (or in the immediate control or possession of his employer or counsel) which are within the scope of the documents requested below:

- 1) All personally notes, daily timers, time records, log books, note books, personal calendars, tape memos, tape recordings or other documentation prepared or used by the witness to regularly schedule, attend, or take notes during any meeting(s) held between December, 1987 and present that in any way relate any meeting, review, approval or appraisal of the SONOPCO Project, Southern Nuclear, Georgia Power's nuclear operations, Georgia Power's budgeting process (nuclear and non-nuclear), or The Southern Company's role, involvement or monitoring of Southern Nuclear, Georgia Power's nuclear units, or the SONOPCO Project.
- 2) Any document reviewed by the witness in anticipation of testifying (including previous documents reviewed by the witness that were reviewed prior to testifying at his earlier deposition taken in this proceeding);

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- 3) Documents related to the oversight and operating responsibilities (including internal studies) of the SONOPCO Project and/or Southern Nuclear.
- 4) All documents pertaining to the approval or disapproval of any proposed or final 1989 and 1990 SONOPCO and/or Southern Nuclear and/or GPC nuclear budget, including preliminary evaluations, documents questioning expenditures, voting records, sign-off sheets, logs, meeting minutes, executive summaries, memorandum to, from or received by the witness that relate to the approval or disapproval of any proposed or final nuclear budget.
- 5) All minutes, notes, records, voting records, approvals memorandum or other documentation created by the witness or received by the witness (including Board of Director meeting notes and minutes) that mention or discuss, directly or indirectly:
  - i. The decision and/or approval to relocate GPC's nuclear operations to Birmingham;
  - ii. Personnel decisions, including the selection and approval of Ken McCoy, George Hairston and Pat McDonald to any position within the SONOPCO Project or GPC;
  - iii. The approval of the formation of the SONOPCO Project and/or Southern Nuclear.
  - iv. The creation, nomination, selection, configuration or operation of any proposed or final Board of Directors established to govern the SONOPCO Project and/or Southern Nuclear.
  - v. The selection of Joe Farley to any position within the Southern System between 1987 and present.

This deposition shall continue until the witness has fully testified to the matters pertaining to the admitted license transfer contention; with respect to the documents produced by the witness; and with respect to all matters generally discoverable as background material and relevant to said contention.

Respectfully submitted,



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

Dated: June 5, 1994

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

\_\_\_\_\_  
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

) Re: License Amendment  
) (transfer to Southern Nuclear)

) ASLBP No. 93-671-01-OLA-3  
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INTERVENOR'S NOTICE OF DEPOSITION OF A.W. DAHLBERG

Intervenor, pursuant to 10 C.F.R. §2.740a(a), hereby provides notice that commencing at 2:00 pm, June 10, 1994, counsel for Intervenor will take the deposition upon oral examination of A.W. Dahlberg at the Troutman Sanders law offices.

The witness is directed to bring with him all materials in his immediate control or possession (or in the immediate control or possession of his employer or counsel) which are within the scope of the documents requested below:

- 1) All personally notes, daily timers, time records, log books, note books, personal calendars, tape memos, tape recordings or other documentation prepared or used by the witness to regularly schedule, attend, or take notes during any meeting(s) held between December, 1987 and present that in any way relate any meeting, review, approval or appraisal of the SONOPCO Project, Southern Nuclear, Georgia Power's nuclear operations, Georgia Power's budgeting process (nuclear and non-nuclear), or The Southern Company's role, involvement or monitoring of Southern Nuclear, Georgia Power's nuclear units, or the SONOPCO Project.
- 2) Any document reviewed by the witness in anticipation of testifying (including previous documents reviewed by the witness that were reviewed prior to testifying at his earlier deposition taken in this proceeding);

- 3) Documents related to the oversight and operating responsibilities (including internal studies) of the SONOPCO Project and/or Southern Nuclear.
- 4) All documents pertaining to the approval or disapproval of any proposed or final 1989 and 1990 SONOPCO and/or Southern Nuclear and/or GPC nuclear budget, including preliminary evaluations, documents questioning expenditures, voting records, sign-off sheets, logs, meeting minutes, executive summaries, memorandum to, from or received by the witness that relate to the approval or disapproval of any proposed or final nuclear budget.
- 5) All minutes, notes, records, voting records, approvals memorandum or other documentation created by the witness or received by the witness (including Board of Director meeting notes and minutes) that mention or discuss, directly or indirectly:
  - i. The decision and/or approval to relocate GPC's nuclear operations to Birmingham;
  - ii. Personnel decisions, including the selection and approval of Ken McCoy, George Hairston and Pat McDonald to any position within the SONOPCO Project or GPC;
  - iii. The approval of the formation of the SONOPCO Project and/or Southern Nuclear.
  - iv. The creation, nomination, selection, configuration or operation of any proposed or final Board of Directors established to govern the SONOPCO Project and/or Southern Nuclear.
  - v. The selection of Joe Farley to any position within the Southern System between 1987 and present.

This deposition shall continue until the witness has fully testified to the matters pertaining to the admitted license transfer contention; with respect to the documents produced by the witness; and with respect to all matters generally discoverable as background material and relevant to said contention.

Respectfully submitted,



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Dated: June 5, 1994

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ATOMIC SAFETY AND LICENSING BOARD

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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

) Re: License Amendment  
) (transfer to Southern Nuclear)

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

INTERVENOR'S NOTICE OF DEPOSITION OF TOM BECKHAM

Intervenor, pursuant to 10 C.F.R. §2.740a(a), hereby provides notice that commencing at 3:30 pm, June 14, 1994, counsel for Intervenor will take the deposition upon oral examination of Tom Beckham at the Troutman Sanders law offices.

The witness is directed to bring with him all materials in his immediate control or possession (or in the immediate control or possession of his employer or counsel) which are within the scope of the documents requested below:


- 1) All personally notes, daily timers, time records, log books, note books, personal calendars, tape memos, tape recordings or other documentation prepared or used by the witness to regularly schedule, attend, or take notes during any meeting(s) held between December, 1987 and present that in any way relate any meeting, review, approval or appraisal of the SONOPCO Project, Southern Nuclear, Georgia Power's nuclear operations, Georgia Power's budgeting process (nuclear and non-nuclear), or The Southern Company's role, involvement or monitoring of Southern Nuclear, Georgia Power's nuclear units, or the SONOPCO Project.
- 2) Any document reviewed by the witness in anticipation of testifying (including previous documents reviewed by the witness that were reviewed prior to testifying at his earlier deposition taken in this proceeding);

- 3) Documents related to the oversight and operating responsibilities (including internal studies) of the SONOPCO Project and/or Southern Nuclear.
- 4) All documents pertaining to the approval or disapproval of any proposed or final 1989 and 1990 SONOPCO and/or Southern Nuclear and/or GPC nuclear budget, including preliminary evaluations, documents questioning expenditures, voting records, sign-off sheets, logs, meeting minutes, executive summaries, memorandum to, from or received by the witness that relate to the approval or disapproval of any proposed or final nuclear budget.
- 5) All minutes, notes, records, voting records, approvals memorandum or other documentation created by the witness or received by the witness (including Board of Director meeting notes and minutes) that mention or discuss, directly or indirectly:
  - i. The decision and/or approval to relocate GPC's nuclear operations to Birmingham;
  - ii. Personnel decisions, including the selection and approval of Ken McCoy, George Hairston and Pat McDonald to any position within the SONOPCO Project or GPC;
  - iii. The approval of the formation of the SONOPCO Project and/or Southern Nuclear.
  - iv. The creation, nomination, selection, configuration or operation of any proposed or final Board of Directors established to govern the SONOPCO Project and/or Southern Nuclear.
  - v. The selection of Joe Farley to any position within the Southern System between 1987 and present.



This deposition shall continue until the witness has fully testified to the matters pertaining to the admitted license transfer contention; with respect to the documents produced by the witness; and with respect to all matters generally discoverable as background material and relevant to said contention.

Respectfully submitted,



Michael D. Kohn  
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517 Florida Ave., N.W.  
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(202) 234-4663

Dated: June 5, 1994

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NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

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

INTERVENOR'S NOTICE OF DEPOSITION OF JEFF WALLACE

Intervenor, pursuant to 10 C.F.R. §2.740a(a), hereby provides notice that commencing at 1:00 pm, June 13, 1994, counsel for Intervenor will take the deposition upon oral examination of Jeff Wallace at the law offices of Troutman Sanders.

The witness is directed to bring with him all materials in his immediate control or possession (or in the immediate control or possession of his employer or counsel) which are within the scope of the documents requested below:

- 1) All personally notes, daily timers, time records, log books, note books, personal calendars, tape memos, tape recordings or other documentation prepared or used by the witness to regularly schedule, attend, or take notes during any meeting(s) held between December, 1987 and 1990 that in any way relate to the approval or disapproval of a proposed or final Georgia Power Company budget.
- 2) All documents pertaining to the approval or disapproval of any proposed or final 1989 and 1990 SONOPCO and/or Southern Nuclear and/or GPC nuclear budget, including preliminary evaluations, documents questioning expenditures, voting records, sign-off sheets, logs, meeting minutes, executive summaries, memorandum to, from or received by the witness that relate to the approval or disapproval of any proposed or final nuclear budget.

- 3) Any document mentioning Marvin Hobby or which relates to the Nuclear Contract Administration group formerly headed up by Mr. Hobby.
- 4) Any document reviewed by the witness in anticipation of testifying (including previous documents reviewed by the witness that were reviewed prior to testifying at his earlier deposition taken in this proceeding);

This deposition shall continue until the witness has fully testified to the matters pertaining to the admitted license transfer contention; with respect to the documents produced by the witness; and with respect to all matters generally discoverable as background material and relevant to said contention.

Respectfully submitted,



Michael D. Kohn  
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517 Florida Ave., N.W.  
Washington, D.C. 20001  
(202) 234-4663

Dated: June 5, 1994

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(Vogtle Electric Generating )  
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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 )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Notice of Deposition of Ed Addison, Jeff Wallace, A.W. Dahlberg, and Tom Beckham has been served on the 5th day of June, 1994, by first class mail upon the following (additional service by facsimile on June 5, 1994 designated by "\*"):

Administrative Judge  
Peter B. Bloch, Chair  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge  
James H. Carpenter  
933 Green Point Drive  
Oyster Point  
Sunset Beach, NC 28468

Administrative Judge  
Thomas D. Murphy  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*Charles A. Barth, Esq.  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

\*John Lamberski, Esq.  
Troutman Sanders  
Suite 5200  
600 Peachtree Street, N.E.  
Atlanta, GA 30308-2216

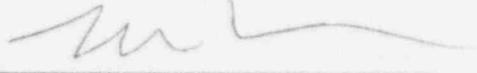
[continued on next page]

\*Ernest L. Blake, Jr.  
David R. Lewis  
SHAW, PITTMAN, POTTS &  
TROWBRIDGE  
2300 N Street, N.W.  
Washington, D.C. 20037

\*Office of the Secretary  
Attn: Docketing and Service  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Office of Commission Appellate  
Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

By:

  
\_\_\_\_\_  
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