## RELATED CORRESPONDENCE

DOCKETED USNR fane 17, 1994

UNITED STATES OF AMERICA

'94 JUN 21 A10:56

# NUCLEAR REGULATORY COMMISSION OFFICE OF SECRETARY

BEFORE THE 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	*	Re: License Amendment	
Generating Plant,	*	(Transfer	to Southern
Units 1 and 2)	*	Nuclear)	
	*		
	*	ASLBP No. 9	93-671-01-OLA-3

## GEORGIA POWER COMPANY'S FIRST SUPPLEMENTAL RESPONSE TO ALLEN L. MOSBAUGH'S THIRD SET OF INTERROGATORIES

## I. Introduction

: 15231

Georgia Power Company ("GPC") hereby provides a supplemental response to Allen L. Mosbaugh's Third Set of Interrogatories, dated May 17, 1994. In providing this supplemental response, GPC incorporates each of the objections previously asserted in Georgia Power Company's Response to Allen L. Mosbaugh's Third Set of Interrogatories, dated June 10, 1994.

## II. Supplemental Response to Interrogatories and Document Requests for Persons Listed

Several of the individual respondents indicated that they participated in an NRC

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inspection conducted by the NRC Region II on May 9 through May 20, 1994. The inspection focussed on the effectiveness of GPC's corrective actions associated with the Vogtle Unit 1 diesel generators following the March 20, 1990 Site Area Emergency. The inspection team issued its inspection report on June 9, 1994 (NRC Inspection Report Nos. 50-424/94-12 and 50-425/94-12). GPC did not keep an index of the documents the NRC copied or reviewed in this inspection, nor did GPC retain a copy of such documents other than a document entitled "Calcon Sensor Failures" and a document listing maintenance work orders from 1990 to the date of the inspection related to air dryer problems. These two documents will be made available for Intervenor's inspection.

- 5. (Mr. Mark Briney) Mr. Briney had contacts with members of the Augmented Inspection Team and Incident Investigation Team following the March 20, 1990 event. He left the employ of GPC in September 1991. He does not recall any other contacts responsive to this request.
- 11. (Mr. Bill Chenault) Mr. Chenault had contacts with members of the Augmented Inspection Team and Incident Investigation Team following the March 20, 1990 event. He does not recall any other contacts responsive to this request.
- 27. (Mr. Patrick McDonald) On September 5, 1990, Mr. McDonald attended an NRC Enforcement Conference in Atlanta, Georgia where matters related to the current Notice of Violation were discussed. Documentation concerning this enforcement conference has been previously produced.

Mr. McDonald also participated in an exit meeting with the NRC's Operational Safety Inspection Team in August, 1990. He was interviewed by the NRC's Office of Investigations on July 1, 1993.

Dated:

June 17, 1994

du John Lamberski

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Counsel for Georgia Power Company

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

ATOMIC	SAFETY AND LICENSING BOARD
*	
*	
*	Docket Nos. 50-424-OLA-3
*	50-425-0LA-3
*	
*	Re: License Amendment
*	(Transfer to Southern
*	Nuclear)
*	
*	ASLBP No. 93-671-01-0LA-3
	* * * * * * * *

#### AFFIDAVIT OF THOMAS L. PENLAND, JR.

I, Thomas L. Penland, Jr., being duly sworn, state as follows:

 I am an associate in the law firm of Troutman Sanders, where I have practiced law since being admitted to the State Bar of Georgia in 1993.

2. I am duly authorized to verify Georgia Power Company's First Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories; specifically, Section II "Supplemental Response to Interrogatories and Document Requests for Persons Listed."

I hereby certify that the statements and opinions in such responses are true and correct representation of the responses provided by the named individuals to the best of my personal knowledge and belief.

Sworn to and subscribed before me this /// day of/June, 1994.

Notary Publ

My commission expires:

Notary Public, Cobb County, Georgia. My Commission Expires January 12, 1998.

## UNITED STATES OF AMERICA

DOCKETED USNRC

#### NUCLEAR REGULATORY COMMISSION

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#### BEFORE THE COMMISSION

'94 JUN 21 A10:56

OFFICE OF SECRETARY

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) Docket Nos. 50-424-OLA-3
) 50-425-0LA-3
) Re: License Amendment
(Transfer to Southern
Nuclear)
ASLBP No. 93-671-01-0LA-3

### CERTIFICATE OF SERVICE

I hereby certify that copies of "Georgia Power Company's First Supplemental Response to Allen L. Mosbaugh's Third Set of Interrogatories" was served by express mail upon the persons listed on the attached service list, this 17th day of June, 1994.

Rular Jøhn Lambers

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

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In the Matter of			
GEORGIA POWER COMPANY et al.	, * * *	Docket Nos. 50-424-OLA-3 50-425-OLA-3	
(Vogtle Electric Generating Plant,	*	Re: License Amendment (Transfer to Southern	
Units 1 and 2)	*	Nuclear)	
		ASLBP No. 93-671-01-0LA-3 VICE LIST	
Administrative Judge		Stewart D. Ebneter	
Peter B. Bloch, Chair		Regional Administrator	
Atomic Safety and Lic	ensing	USNRC, Region II	
Board		101 Marietta Street, N	W
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Administrative Judge		U.S. Nuclear Regulator	
James H. Carpenter		Commission	X
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Board		ATTN: Docketing an	
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Sunset Beach, NC 284	68	Charles Barth, Esq.	
		Office of General Coun	sel
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Thomas D. Murphy		Stop 15B18	
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Washington, D.C. 2055	5	Director,	
		Environmental Protection	on
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