

explaining your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.

B. Each interrogatory is a continuing one, and should be supplemented as required by 10 C.F.R. §2.740(e).

C. If you claim that any information which is required to be provided by you in your response to any of these interrogatories is privileged or immune from discovery:

1. Identify the portion of the interrogatory to which such information is otherwise the response;

2. If the information is a document or oral communication, identify the document's title or the oral communication and state the general subject matter of the document or oral communication;

3. If the information is a document or oral communication, state the date of the document or oral communication.

4. If a document, identify its author(s) and the person(s) for whom it was prepared or to whom it was sent, including all persons who received copies;

5. If an oral communication, identify all persons present at the time of the oral communication;

6. State the nature of the privilege or immunity claimed; and

7. State in detail each and every fact upon which you base your claim of privilege or immunity from discovery.

D. In each case where you are asked to identify or to state the identity of a document or where the answer to the interrogatory refers to a document, state with respect to each such document:

1. The identify of the person who prepared it;
2. The identity of all persons who reviewed or approved it;
3. The identity of the person who signed it, or over whose name it was issued;
4. The identity of the addressee or addressees;
5. The nature and substance of the document with sufficient particularity to enable the same to be identified;
6. The date of the document; and
7. The present location of the document and the identity and address of each person who has custody of the document.

E. In each case where you are required to identify an oral communication, or where the answer to the interrogatory refers to an oral communication, state with respect thereto:

1. The date and place thereof;
2. The identity of each person who participated in or heard any part of the communication;
3. If the communication was by telephone, so indicate and state who initiated the telephone call;

4. The substance of what was said by each person who participated in the communication; and

5. The location and the identity and address of the custodian of any document (including any mechanical, magnetic, electrical or electronic recording) that recorded, summarized, reported or confirmed the oral communication.

F. In each instance where you are asked to identify or state the identity of a person, or where the answer to an interrogatory refers to a person, state with respect to each such person:

1. His/her name;

2. His/her last known business and residence addresses and telephone numbers;

3. If an individual, his/her business affiliation or employment at the date of the transaction, event or matter referred to; and

4. If a corporation or association, the business or activity in which it was engaged at the date of the transaction, event or matter referred to.

III. DEFINITIONS

1. The term "NRC" shall mean every past or present employee of the Nuclear Regulatory Commission, any investigative body, office or subdivision of the Nuclear Regulatory Commission, every past or present Commissioner of the Nuclear Regulatory Commission.

2. "Document" shall mean every instrument or device by which, through which or on which information has been recorded including those reflecting meetings, discussions or conversations; notes; letters; drawings; files; graphs; charts; maps; photographs; deeds; studies; data sheets; notebooks; books; appointment calendars; telephone bills; telephone messages; receipts; vouchers; minutes of meetings; pamphlets; computations; calculations; accounting(s); financial statements; voice recordings; computer printouts; and device or media on which or through which information of any type is transmitted, recorded or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

3. "Contact" means any and all communication by any means whatsoever that involved a transfer of information, whether written, oral or in any other form, including discussions, letters, memoranda, telephone calls, or telegrams.

4. The term "identify" means:

a. As to conversations, stating the parties of the conversation, the date of the conversation, the subject matter of the conversation, and the portions of the conversation responsive to the particular interrogatory;

b. As to the individuals, stating their name, business address, position or job, their relation, if any, to the parties in this proceeding, and their present or former affiliation or contact with Respondent;

c. As to meetings and contacts, stating the date of each such meeting or contact, the participants and the titles of those participants, and the substance thereof. Identify all documents written during, or as a result of, such meeting or contact. Identify all communications preceding, during, and subsequent to such meeting or contact.

6. As used herein, the terms "Licensee", "Georgia Power Company", "The Southern Company", "SONOPCO", "you" and "your" and any other derivative therefrom are intended to, and shall, embrace and include any agent or employee of Georgia Power Company, The Southern Company, and/or SONOPCO, past or present, their counsel and all their respective agents, servants, associates, employees, representatives, private investigators, and others who are or have been in possession of or may have obtained information for or on behalf of Georgia Power Company, The Southern Company, and/or SONOPCO.

IV. INTERROGATORIES AND DOCUMENT REQUESTS

1. State whether the list of diesel starts prepared by Mr. Webb on April 19, 1990, is in existence. If it exists produce a copy of it.

2. In reference to Mr. Webb's April 19, 1990 diesel start list respond to the following:

- a) identify every person who received a copy of it;
- b) identify any documents it was used to prepare or create;

- c) identify the last person known to have seen it or a copy of it;
 - d) state in detail how it was discovered that it had been lost or destroyed on or about April 30, 1990;
3. Produce all Outside Operator Round Sheets that document Diesel Generator blowdown of air receivers, from 1989 to present, as identified by Kenneth Stokes during the course of his deposition.
 4. Produce the full work order package documenting the April 6, 1990 inspection of Diesel Generator 1A air receiver and any other air receiver inspections which occurred after the Site Area Emergency.
 5. Produce any documents which discuss, mention, or infer the discovery or presence of water in the diesel generator air systems, from 1989 to present.
 6. State the date the NRC first discussed the preservation of root cause evidence and/or the quarantine of the 1A diesel generator with GPC/Southern Nuclear.
 7. Identify the technicians and/or operators who advised Paul Kochery of water being discovered in the diesel starting air system.
 8. State the identity of any individuals who may have told Ken Holmes that there may be water in diesel trip lines.
 9. Identify all Cooper Industry personnel who performed physical work on diesel trip lines.

10. Produce all documents contained in GPC and/or Southern Nuclear's computer files (including Historic computer files):

- a) identified in 92 PROJECT documents identified by Bates numbers 055896 and 055899;
- b) identified in "BASE SYSTEM" files.

11. State whether "BASE SYSTEM" files include the time and date a file is created or revised. If the answer is yes, produce a computer printout of this information.

12. Identify and produce a computer file listing of all files contained in any computer system, from March 20, 1990 to August 30, 1990, used by Jack Stringfellow, James Bailey, George Bockhold, Skip Kitchens, George Hairston, Ken McCoy or anyone acting on their behalf.

13. Produce all files identified in the computer file listings in Number 12, above.

14. Produce all documents received from the NRC from March 20, 1990 through the present, that relate to the LER, COA, Diesel Generator reliability, or any communications from the NRC concerning the SAE. (Intervenor excludes from this request any documents to be contained in the NRC Public Document Room.

15. Identify any and all FOIA request filed on the NRC from March 20, 1990 through present, relating in any way to diesel generators, Allen Mosbaugh, the Site Area Emergency or the OI Report.

16. With Respect to the 92 PROJECT document identified by Bates number 054870, identify the person responsible for filling

out the document (i.e. identify person whose handwriting is on the document) and identify the person named Warren listed as the "SUPV." OR "COORD."

17. Produce all documents, that Intervenor has requested in previous request for documents in this phase of discovery, which Licensee has not previously produced.

18. Produce all documents used to or created by responding to the above interrogatories and document request.

Respectfully submitted,



Michael D. Kohn
Mary Jane Wilmoth
KOHN, KOHN AND COLAPINTO
517 Florida Avenue, N.W.
Washington, D.C. 20001-1850
(202) 234-4663

Attorneys for Intervenor

Dated: July 8, 1994

CERTIFICATE OF SERVICE

I hereby certify that a copy of Intervenor's Fifth Interrogatory and Document Request to Georgia Power Company was served this 8th day of July, 1994 by hand-delivery upon counsel to Licensee, David R. Lewis, Esq., located at Shaw, Pittman, Pitts & Trowbridge, 2300 N Street, N.W., Washington, D.C.; Charles Barth, Esq., Office of General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555; and by first class mail upon the persons listed in the attached Service List.

By: 

Mary Jane Wilmoth, Esq.
KOHN, KOHN & COLAPINTO, P.C.
517 Florida Ave., N.W.
Washington, D.C. 20001
(202) 234-4663

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

DOCKETED
USNRC

'94 JUL 11 P6:46

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)

SERVICE LIST

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

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

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

301\cert.lis