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## RELATED CORRESPONDENCE

DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD '94 JUL 11 P6:22Before Administrative Judges:  
Peter B. Bloch, Chair  
Dr. James H. Carpenter  
Thomas D. MurphyOFFICE OF SECRETARY  
DOCKETING SERVICE  
RECEIVED

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-3Re: License Amendment  
(transfer to Southern Nuclear)

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

INTERVENOR'S FIFTH REQUEST FOR INTERROGATORIES  
AND DOCUMENT REQUEST TO GEORGIA POWER COMPANYI. INTRODUCTION

Pursuant to 10. C.F.R. §2.740b, Allen Mosbaugh hereby requests that Georgia Power Company (hereinafter referred to as "GPC") answer the following interrogatories in writing and under oath, and produce any documents requested herein that have not already been produced.

II. INSTRUCTIONS

A. When responding to these Interrogatories refer to each tape by its NRC tape number (i.e. Response 1(a)(1): NRC Tape No. 001.

B. If you cannot answer a particular interrogatory in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying and explaining your inability to answer the remainder and stating

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whatever information or knowledge you have concerning the unanswered portion.

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

D. 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.

E. In each case where you are asked to identify or to state the identify 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.

F. 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

A. As used herein, the terms "Licensee", "Georgia Power Company", "The Southern Company", "SONOPCO", "you", or "Your" and any synonym thereof and derivative therefrom are intended to, and shall, embrace and include every 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 each person listed in any manner with respect to any matter referred to in these request for admissions.

B. As used herein, the term "documents" includes any written, recorded or graphic matter, however produced or reproduced, of every kind and regardless of where located, including but not limited to any summary, schedule, memorandum, note , statement, letter, telegram, interoffice communication, report, diary, desk or pocket calendar or notebook, daybook, appointment book, pamphlet, periodical, work sheet, cost sheet, list, graph, chart, index, tape, record, partial or complete report of telephone or oral conversation, compilation, tape recordings made by Intervenor, tabulation, study, analysis, transcript, minutes, and all other memorials of any conversations, meetings, and conferences by telephone or otherwise, and any other writing or recording which is in the possession, custody or control of the Licensee or any employees, representatives, attorneys, investigators, or others acting on his behalf.

C. As used herein, the terms "and" and "or" shall each mean and/or.

D. As used herein, the "Allen Mosbaugh" and the term "petitioner" or "intervenor" shall mean Allen Mosbaugh, the Intervenor in this proceeding.

E. As used herein, the term "date" shall mean the exact day, month, and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

F. As used herein, the term "person" shall mean any individual, partnership, firm, association, corporation or other government, legal or business entity.

G. As used herein, the term "detail" and the phrases "state in detail" and "describe in detail" shall mean that you are requested to state, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event and date, relating to or otherwise pertaining to the matters inquired of in said interrogatory.

H. As used herein, the term "NRC" shall mean the U.S. Nuclear Regulatory Commission, an agency of the Federal Government, and any and all offices within the Nuclear Regulatory Commission, including NRC Staff, NRC Office of Investigations, and all their respective attorneys, agents, servants, associates, employees, representatives, investigators.

I. As used herein, the term "Mosbaugh Tapes" shall mean the tape recordings made by Allen L. Mosbaugh which have been numbered 1-277 by the NRC for identification purposes.

#### IV. INTERROGATORIES AND DOCUMENT REQUESTS

1. Please respond to the following interrogatories for each of the Mosbaugh tapes listed below:

a. Identify every person whose voice is on the tape.

b. For every person identified in 1(a) above, please list every statement of that person which is on the tape.

c. State whether you believe each and every statement identified in 1(b) above, to be true and accurate, and identify each and every statement you deny is true and accurate.

d. For each and every statement you identified in 1(c) above as not being true and accurate, explain in detail the reason(s) for denying each of the identified statements is true and accurate.

e. If a transcript exists for any of the Mosbaugh tapes listed below, produce a copy of such.

f. Identify all inaudible sections of each and every tape listed below.

<u>NRC Tape NO.</u>	<u>NRC Tape NO.</u>
1. 001	13. 033
2. 002	14. 036
3. 003	15. 035
4. 004	16. 036
5. 005	17. 037
6. 006	18. 038
7. 015	19. 044
8. 016	20. 046
9. 022	21. 051
10. 023	22. 052
11. 025	23. 054
12. 026	24. 055

25.	056	51.	108
26.	059	52.	109
27.	060	53.	110
28.	061	54.	111
29.	062	55.	112
30.	063	56.	113
31.	064	57.	114
32.	065	58.	115
33.	067	59.	116
34.	068	60.	117
35.	070	61.	118
36.	072	62.	119
37.	077	63.	120
38.	078	64.	121
39.	080	65.	123
40.	082	66.	124
41.	084	67.	125
42.	085	68.	129
43.	088	69.	130
44.	091	70.	131
45.	092	71.	132
46.	093	72.	133
47.	094	73.	134
48.	097	74.	135
49.	104	75.	136
50.	105	76.	137



77.	138	103.	180
78.	139	104.	181
79.	140	105.	189
80.	141	106.	190
81.	142	107.	191
82.	144	108.	192
83.	145	109.	193
84.	146	110.	194
85.	147	111.	195
86.	148	112.	196
87.	149	113.	197
88.	150	114.	198
89.	151	115.	202
90.	152	116.	203
91.	153	117.	206
92.	154	118.	207
93.	163	119.	208
94.	164	120.	209
95.	170	121.	210
96.	171	122.	211
97.	173	123.	218
98.	174	124.	221
99.	176	125.	228
100.	177	126.	229
101.	178	127.	232
102.	179	128.	233

129. 235	139. 263
130. 236	140. 265
131. 237	141. 270
132. 238	142. 271
133. 239	143. 272
134. 240	144. 273
135. 241	145. 274
136. 242	146. 275
137. 243	147. 276
138. 244	148. 277

2. Produce all documents used in or created by answering the above interrogatories.

Respectfully submitted,

*Mary Jane Wilmoth*  
 Mary Jane Wilmoth  
 KOHN, KOHN & COLAPINTO, P.C.  
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Attorney for Intervenor

DATED this 7th day of July 1994.

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

DOCKETED

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GEORGIA POWER COMPANY )  
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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

CERTIFICATE OF SERVICE

I hereby certify that Intervenor's Second Request for Admissions to NRC Staff, Intervenor's Sixth Request for Interrogatories and Document Request to Georgia Power Company, and Intervenor's Third Request for Admissions to Georgia Power Company have been served this 7th day of July, 1994, by first class mail upon the persons listed in the attached Service List, with the exception that they were hand delivered to the Office of General Counsel, and Licensee's Washington counsel as indicated by "\*\*".

By:

*Mary Jane Wilmoth*  
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UNITED STATES OF AMERICA  
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

SERVICE LIST

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