

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

DOCKETED
USNRC

27 (R)

'95 JUL 28 P4:01

Before Administrative Judges:
Peter B. Bloch, Chair
Dr. James H. Carpenter
Thomas D. Murphy

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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 RESPONSE TO THE
SECOND SET OF INTERROGATORIES OF GEORGIA POWER COMPANY

Intervenor, Allen L. Mosbaugh, files his responses to the interrogatories filed by Georgia Power Company ("GPC") on July 26, 1993.

Interrogatory Responses.

- 1. a. On June 13 or 14, 1990.
- b. Prior to July 15, 1993, Intervenor provided copies to counsel and United States Congressional staff personnel.
- c. Intervenor discussed virtually all aspects of this document with Mr. Robinson between June 13-14, 1990. The exact comments are not recorded and Intervenor has no notes of his meetings with NRC-OI. Additional discussions occurred between July 18-19, 1990, when Mr. Mosbaugh was interviewed under oath by NRC-OI.¹ Mr. Mosbaugh cannot recall the

¹ Intervenor is relying on NRC's response to GPC's request for documents for the accuracy of the July 18 and 19, 1990 dates. Intervenor knows that his interviews occurred in July but he does not have an independent recollection of the dates.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA-3 EXHIBIT NO. GPC II-96

In the matter of Georgia Power Co. et al., Vogtle Units 1 & 2

Staff Applicant Intervenor Other

Identified Received Rejected Reporter CR

Date 7-7-95 Witness Mosbaugh

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G PDR

statements made beyond stating that statements contained in this documents and facts related thereto were discussed. Nonetheless, Intervenor believes that the transcript of his interviews with NRC-OI will accurately reflect any discussions occurring at that time.

d. Since March 20, 1990, 1B diesel had problems or failures on at least start numbers 1, 2, 4, 5, 13, 14, 15, 17, and a problem occurring on April 3, 1990 at 05:15 between starts 26 and 27. Intervenor has not determined the root cause of these failures and problems, but believes that start numbers 13, 15, and 17 may be associated with the problems experienced with the A diesel on March 20, 1990.

e. Intervenor objects to responding to this portion of the interrogatory question as it requires Intervenor to provide a speculative response. Without waiving this objection, Intervenor states that the answer is yes. The bases for this response is as follows: 1) NRC was not fully aware of the extent of the continuing reliability problems associated with the Calcon Switches; 2) NRC was not aware that operational problems with the control air system were not corrected; and 3) NRC was not aware that the diesel had yet to achieve the required level of reliability.

f. Based on a comment from John Aufdenkampe, Intervenor was under the impression that information and source documents were provided to Al Chaffee and/or someone on his team by persons then reporting to John Aufdenkampe. Intervenor does

not know the exact date this occurred, and his knowledge is based on hearsay. Most likely this comment is contained somewhere in the Mosbaugh tape recordings. Intervenor's best guess as to the time frame is some time between late March and early to mid June of 1990.

g. Intervenor cannot speak for NRC as to which starts NRC was unaware of having occurring by April 12, 1990.

h. Intervenor has no recollection of being advised on or before April 9, 1990 that NRC was informed of all of the failures and problems occurring on the 1 B diesel generator that occurred up to that point.

i. GPC's April 9, 1990 Confirmation of Action letter states at page 4: "completion of these investigations, reviews, tests and corrective actions justify GPC's determination that the DG's are operable." Based on this statement, if these investigations, reviews, tests and corrective actions were not adequately completed, then it stands to reason that the diesel generators may not have been operable. Intervenor contends that until the root cause of the failure was corrected (i.e., removal of the Calcon switches) and the diesel was proven reliable, it was imprudent to declare the diesels operable.

j. Intervenor contends that at a minimum, the problems with the Calcon switches should have been corrected, and that this correction would not include either re-calibration or replacement of the Calcon switches (as this activity was

already known to be an ineffective remedy to the root cause of the reliability problem).

k. Intervenor recalls being involved with an in-house review of the feasibility of the replacement of the pneumatic control system, during which time he discussed the benefits replacing the control system would have on the reliability of the diesel generator. Mr. Mosbaugh also consulted with an intervenor group who wanted the control systems replaced. Mr. Mosbaugh advised the intervenor group that it was an idea worth consideration and that other plants had replaced their control systems.

l. Intervenor does not have specific knowledge of information provided to or retained by Al Chaffee. However, Intervenor does not believe that he knew the extent of the unreliability of the Calcon switches or of the true feeling of the Instrument and Control group at Plant Vogtle about the Calcons.

m. Yes, the 95% reliability factor per diesel generator is an ongoing requirement. As a result of the diesel's failure to adequately perform its safety function when actually called upon to do so, the continuing 95% reliability factor was disrupted. At that point GPC was required to correct the root cause and establish that the diesel system had regained the 99% reliability factor (and each diesel had regained a 95% reliability factor) before the diesel system could be declared operable and before NRC should have lifted

the hold on the restart of Unit 1. This is based on NRC requirements set out in Diesel Generator System Regulatory Guide and NRC Branch Technical Position EICS (b)(2), "Diesel Generator Reliability Quality Testing," dated 11-24-95, Standard Review Plan app. 7(a) of NUREG 75/087;² and NRC Generic Letter 84-15.³

2. a-c. Intervenor incorporates his response to Interrogatory 1, subparts a, b and c, as stated above.

d. The 4-18-90 date is incorrect as the conversations occurred on 4-19-90. The conversations occurring on 4-19-90 were previously identified in Intervenor's response to GPC's first set of interrogatory questions (the actual conversations were produced in the tapes Intervenor provided to GPC).

e. Mr. Mosbaugh saw a list of diesel starts, but does not know who prepared this list. Intervenor does not recall ever possessing a final list prepared by Webb and/or Odem and does not have in his custody or control any list he believes were prepared by Webb or Odem.

3. a. June, 1991.

b. Intervenor incorporates his response to Interrogatory response 1(b).

² This document requires GPC to establish a 99% reliability at a nominal 50% confidence level for a plant diesel generator system (i.e., both diesels combined).

³ This document states that the reliability goal on a per diesel basis is to be at a minimal reliability level of 95%.

c. Intervenor made oral statements regarding the issues discussed in the document to Larry Robinson in June of 1991. In addition, prior to the Senate subcommittee hearings, Intervenor met with Senator Lieberman's aid, Dan Berkowitz, and discussed the issues detailed in this document. Between July 18-19, 1990, during the course of a transcribed interview Mr. Mosbaugh provided NRC-OI, Intervenor made additional statements regarding the issues contained in this document.

d. On 4-19-90 Messrs. Shipman and Stringfellow stated to Mr. Mosbaugh that they were about to discuss the fact that the diesel generators had experienced failures and trips with Mr. Hairston. After making this statement, during the course of a subsequent telephone conference call, Mr. Hairston stated: "so we didn't have no trips?" Mr. Hairston's reference to "trips" evidences that he did, in fact, have discussions with Shipman and/or Stringfellow concerning trips of the diesel generator.

e. Statements contained in the Six Tapes set out the statements Intervenor knows to have been made. One such statement not contained in this document concerns a statement made by Mr. Aufdenkampe after April 9, 1990, where he refers to GPC's April 9, 1990 Confirmation of Action letter as a document "where they lied" to the NRC.

4. a-c. Intervenor incorporates his response to Interrogatory 3, subparts a, b and c, as stated above.

5. a-b. This information is set out in the Six Tapes provided to GPC and in the conversations referenced in Interrogatory question 3(e) above. GPC's counsel had discussed with counsel to Intervenor the desirability of attempting to verify the accuracy of transcripts of these conversations, including the individuals speaking and the statements made. This future effort will provide GPC with the information herein requested. Nonetheless, Intervenor believes the transcripts of conversations set out as Attachments 1 (entitled "Transcript Mosbaugh Tape of Conversation A") and 2 (entitled "Transcript Mosbaugh Tape of Conversation B") hereto accurately reflect conversations occurring on April 19, 1990.

c. Intervenor formally drew the conclusion that the inaccuracy was willful by 6-13-90, and initially began to draw this conclusion on 4-19-90. The conclusion was based on the information discussed in the documents referenced in interrogatories 1-4 above, as well as the tape recording of the 3-23-90 Site Area Emergency critique team, and statement made by Cash as to his knowledge of the diesel trips which occurred of 3-23-90. The critique team meeting was recorded by Intervenor and is contained on one of the Six Tapes provided to GPC.

d. At no time did Mr. Mosbaugh specifically tell any GPC employee that he concluded the inaccuracies were willful out of fear that such an accusation of criminal conduct would

result in adverse employment action. Nonetheless, Mr. Mosbaugh did hint his concerns to John Aufdenkampe.

e. Mr. Mosbaugh first contacted the NRC to report the material false statement sometime in early June, 1990, shortly before 6-13-90. He first informed the NRC that these statements may be willful in a June 13, 1990 meeting with Larry Robinson. All documents responsive to this interrogatory have already been produced.

f. J.P. Cash and Ken Burr compiled and counted the start information from a review of Control Room Logs following the instruction Cash received from George Bockhold to "just get the good stuff."

g. Intervenor believes that someone should have questioned the accuracy of this language and he will not be able to fully respond until after Intervenor completes the deposition process.

6. a. Intervenor objects on the ground of duplication as this information was provided in response to Intervenor's response to GPC's first set interrogatory questions. The information is also contained in the Six Tapes and in Attachment 1 and 2 to hereto.

b. Intervenor provided first-hand information demonstrating that this statement was inaccurate on April 19, 1990 to Stringfellow, Shipman and Aufdenkampe. It was provided second-hand to Hairston and others that same day. Statements relating to these events are included in the Six

Tapes. On April 30, 1990, Intervenor provided Mr. Bockhold with a written memorandum demonstrating the inaccuracy of this information.

c. Mr. Mosbaugh began to suspect willful wrongdoing on or about April 19, 1990 and formally concluded such on June 13, 1990.

d. Intervenor indirectly advised GPC the first time when his counsel provided GPC's counsel with a copy of the September 11, 1990 2.206 Petition on the afternoon of September 11, 1990.

e. Intervenor incorporates his response to Interrogatory questions 2a and 3a above.

f. Yes. In discussions occurring on April 19, 1990, Mr. Mosbaugh participated to phone conversations wherein Shipman and Stringfellow were told that language equivalent to this constituted a material false statement.

g. Intervenor was present when the phrase "subsequent to this test program" was being developed for inclusion into the LER. At that time Mr. Bockhold and Mr. McCoy stated the following with respect to the number of starts that were to be included in the language of the LER:

Bockhold: O.K., so we'll say greater than those numbers that were used in the conference [held on April 9, 1990, at NRC Region II headquarters].

McCoy: O.K., and those numbers you used were used in the conference were after they had completed the comprehensive test of the control system on each diesel.

Bockhold: That is correct, those numbers were not before that time.

* * *

Shipman: 18 and 19? What did you have in your presentation George, 17 and 18, or 18 and 19?

Bockhold: 18 and 19.

The reference to the completion of a comprehensive test program for the diesel generators is synonymous with the diesel testing and start information presented to NRC Region II in on April 9, 1990 in a transparency presented by George Bockhold, and which was then reconfirmed in writing in the April 9, 1990 Confirmation of Action response submitted by Mr. Hairston to NRC.

h. Yes. The conversations related to this communication are set out in Attachments 1 and 2 hereto.

7. The PRB and Mr. Aufdenkampe's departments prepared the revision and sent it to the corporate office by May 15, 1990. The documents Intervenor is aware of which evidence such a revision are the PRB meeting minutes.

8. Stokes and Kochery prepared a list of diesel start information. Intervenor does not recall exactly when he reviewed this document, sometime between 4-9-90 and 4-19-90. Mr. Mosbaugh either had a copy or wrote down information contained in the

Stokes/Kochery list. Intervenor cannot locate either the list prepared by Stokes/Kochery or notes he made concerning failures of the diesel generators. Mr. Mosbaugh also received a copy of Bockhold's transparencies on 4-10-90.

9. The tabulation was finished sometime after April 19 but before April 30, 1990, most likely sometime in the middle of that time period. The information was then provided to Mr. Bockhold on April 30, 1990.

10. Intervenor objects on the basis that the term "successful starts" is not adequately defined and it is not a term defined in Regulatory Guide 1.1.08.

11. Intervenor incorporates his response to Interrogatory No. 10 above.

12. On April 19, 1990, Mr. Aufdenkampe was pressed by Mr. Shipman to buy into the language contained in LER 90-006 (i.e., Shipman stated to Aufdenkampe something to the effect that changing the start numbers would create a huge selling job with the NRC). At this point in time Mr. Aufdenkampe stated to the effect that if George Bockhold asserts that the number of starts is accurate, then, he must be right. Mr. Aufdenkampe thereafter made a statement indicating his lack of trust in the accuracy of Bockhold's assertion by stating to Mr. Mosbaugh something to the effect that if Bockhold's numbers are wrong, GPC will have to revise the LER.

13. Intervenor's knowledge of specific events and knowledge of statements made by GPC employees are contained in the tape

recordings in the possession of NRC and in the tape recordings already in the possession of GPC. Intervenor objects to providing further information on the ground that the question, as worded, is vague and calls for speculation.

14. Yes. Mr. Aufdenkampe at least must have had reservations given his assertion to Mr. Mosbaugh that GPC may have to revise the LER. Moreover, Mr. Aufdenkampe previously stated to Mr. Stringfellow that he believed that the language concerning the number of starts of the diesel generators set out in a prior draft of the LER constituted "a material false statement."

15. On April 19, 1990, Vogtle site personnel (including Messrs. Aufdenkampe, Bockhold and Mosbaugh) participated in a late afternoon conference call with persons from the corporate Southern Nuclear offices (including Messrs. Hairston, Shipman, McCoy and Stringfellow). During this conference call, Messrs. Bockhold, Stringfellow, Shipman and McCoy undertook the task of revising the language of the LER and saw to it that the diesel start information was consistent with the language previously provided to the NRC on April 9, 1990, and at that time included reference to a "comprehensive test program." A subsequent telephone call was received by Mr. Aufdenkampe from Mr. Shipman. During this call Mr. Shipman essentially stated to Mr. Aufdenkampe that it would be advisable to adopt the information presented during the prior conference call because to do otherwise would create a huge selling job with the NRC. Higher levels of management approved the language used in the LER during the prior late afternoon conference

call. The follow-up call did not include further action with respect to revising the wording that had been adopted in the earlier late afternoon conference call. If anything, Mr. Shipman's subsequent call indicates a gut feeling on his part that lower-level management at the site were troubled by the events occurring during the conference call and wanted to bring these managers into the fold.⁴

16. Intervenor objects on the basis of the attorney-client and work product privileges. To the extent that this information is not privileged it is set out in the response Intervenor's counsel filed to GPC's motion to compel production of the tapes.

17. Exhibit 13 which accompanied the exhibits submitted in response to Mr. Mosbaugh's May, 1991 Motion for Summary Decision in DOL case No. 91-ERA-11 constitutes a letter faxed to Mr. Robinson by Mr. Mosbaugh's counsel (exhibit pages 1 and 2) together with two additional pages of documentation provided to Mr. Robinson on June 13, 1990. This document is not the only documentation provided to Mr. Robinson on that day. In this respect, see responses to Interrogatory questions 1.a and 2.a, above.

18. Intervenor assumes that GPC seeks a response with respect to his answer to GPC's first set of interrogatory questions and not Intervenor's response to GPC's first request for documents. In this respect, Intervenor was referring to

⁴ Intervenor has no way of verifying whether Mr. Hairston was a party to the follow-up phone conversation between Aufdenkampe and Shipman, but notes that it was not unusual for managers to listen in on such phone conversations.

interviews conducted by the NRC OSI. Intervenor is not currently in possession of these interview transcripts and cannot state the date or persons interviewed. Moreover, as GPC is in possession of these transcripts, Intervenor objects to further supplementation of this interrogatory question.

b(1). In Intervenor's statement on the bottom of page 18, the word "approved" or "approving" were used to connote the PRB's normal review process, which includes voting on the recommend language and/or the content of all correspondence concerning plant Vogtle and the NRC. This process was the normal PRB policy and procedure in effect during 1990. In this respect, reference to "approve" means that the PRB successfully voted or concurred with recommend language to be forwarded to the NRC. In this respect, the Corrective Action Response letter of April 9, 1990, was not presented to the PRB prior to its transmittal to the NRC which violated the normal plant practice and procedure that was in place at that time.

b(2). No. 

c(1). No. By June 29, 1990, GPC submitted to the NRC a revision to LER 90-006.

c(2). Yes. Everyone on the April 19, 1990 conference call knew or should have known of the failures and problems with the diesel generators which would have rendered the language contained in the LER false.

c(3)-(4). Wording related to the comprehensive test program was not in the particular draft of the LER being discussed

at that time. The fact remains that Mr. Mosbaugh and Mr. Aufdenkampe notified Southern Nuclear management that there were problems and failures that were improperly excluded from the diesel start data set out in the earlier draft of the LER. The subsequent addition of the comprehensive test program language failed to address or correct the underlying factual reason as to why the earlier draft and the LER was materially false. Finally, the exclusion of specific significant problems, including important trips and failures of the diesels that were specifically identified by Mr. Mosbaugh prior to the issuance of the LER demonstrates intentional wrongdoing by omission.

c(5). Yes.

d. Southern Nuclear prepared under the guidance of Mr. Hairston some 7-8 multiple drafts of the cover letter to accompany the revision to LER 90-006. These various drafts include differing and conflicting explanation for the inclusion of the false statement in the original LER. Moreover, the final cover letter to the LER makes reference to record keeping errors contained in the logs. Inasmuch as there were no record keeping errors with respect to the trips and problems experience by the diesel generators, this assertion is materially false.

e. Intervenor notes that GPC states in this question that this meeting occurred on June 9, 1990 (where Intervenor stated in his response June 8, 1990). Intervenor believes this meeting occurred on June 8, 1990, when the IIT presented

a report to the Commission and that this meeting was attended by GPC personnel. Nonetheless, Intervenor did not attend this meeting and has no first hand knowledge of who, in fact, attended this meeting.

f. Yes, Intervenor was party to the conference call and the call was recorded.

g(1). In response to this interrogatory, intervenor does not agree with use of the word "independent". It is Intervenor's understanding that Mr. Aufdenkampe directed his staff to compile "start" data from the main control room logs.

g(2). No. Intervenor incorporates his response to Interrogatory No. 12 above. Nonetheless, Intervenor does not believe that Mr. Aufdenkampe used the word "acceptable."

g(3). GPC already has in its possession all written allegations in the control and possession of Intervenor that were submitted to the NRC.

h. Intervenor objects to responding to this interrogatory as it calls for speculation. Intervenor will not determine this until after the deposition process is concluded.

19. Intervenor brought with him the Six Tapes, handwritten notes and two transcripts of conversations included in the Six Tapes. The two transcripts are attached hereto as Attachments 1 and 2. Attached as Attachment 3 is a four page document consisting of the notes Mr. Mosbaugh had in his possession at the time he presented testimony before the Senate Subcommittee. Mr. Mosbaugh

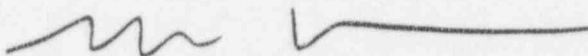
also referred to documents included in the prepared testimony he provided to the Subcommittee the day before he presented live testimony. Mr. Mosbaugh's written testimony and attachments thereto are available for duplication at the law offices of Kohn, Kohn & Colapinto, P.C.

20. Marvin Hobby. Intervenor does not recall discussing with any other current or former Southern System employee matters concerning this proceeding after October 22, 1992. Intervenor objects with respect to individuals his counsel may have contacted on the basis of the attorney work product doctrine.

21. Intervenor does not recall contacting any employee of any of the plant Vogtle co-owners since October 22, 1992. Intervenor further incorporates his response to Interrogatory No. 20 above.

22. Intervenor has previously produced all documents in his control and possession related to the illegal license transfer.

Respectfully submitted,



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ATTACHMENT 1

TRANSCRIPT

MOSEBAUGH TAPE OF CONVERSATION A

(A conversation that allegedly occurred on April 19, 1990)

John Aufdenkampe:
Manager
Technical Support
Vogtle Nuclear Plant

Allen Mosbaugh:
Assistant General Manager
Plant Support (Acting)
Vogtle Nuclear Plant

Jack Stringfellow:
Licensing Engineer
Southwestern Nuclear Operating Company
Birmingham, AL

1 Aufdenkampe: No comment.

2 Stringfellow: Okay.

3 Aufdenkampe: Page two.

4 Stringfellow: Uh.

5 Aufdenkampe: No comment.

6 Stringfellow: Okay.

7 Aufdenkampe: Page three.

8 Stringfellow: Uh.

9 Aufdenkampe: According to the operator, um, third paragraph.

10 Stringfellow: I'm waiting.

11 Aufdenkampe: According to the operator, several annunciators
12 were lit. Then it reads 'in order to restore emergency power...'

13 (pause)

14 Stringfellow: Power.

15 Aufdenkampe: 'The operator reset the annunciators...'

16 (pause)

1 Stringfellow: Okay.

2 Aufdenkampe: 'Without fully evaluating the conditions...'

3 Stringfellow: Okay.

4 Aufdenkampe: And then it goes 'during those times.' Does
5 that take care of Hairston's comment?

6 Stringfellow: Well, only to the extent that, okay, it-it,
7 yeah, that's...

8 Aufdenkampe: We don't know what he saw.

9 Stringfellow: Okay, we can not say what he saw. Right?

10 Mosbaugh: The first time...

11 Aufdenkampe: What's written here - yeah.

12 Mosbaugh: The first trip?

13 Aufdenkampe: Yup.

14 Mosbaugh: No.

15 Aufdenkampe: What's written here is...

16 Mosbaugh: Operations don't know.

17 Aufdenkampe: What was written here is what he said that his
18 report what he saw. What I just gave you is...

19 Stringfellow: What Hairston wants to see in there.

20 Aufdenkampe: ...is a little bit more than-than what he w-w-
21 we read his mind in the PRB. (Laughter)

22 Stringfellow: I understand. Okay, so the-but the answer to
23 Hairston's question is we don't know, uh, what they actually
24 looked at, uh, on that first trip.

25 Aufdenkampe: Well, you don't want to say that. You can't
26 say we don't know what they looked at.

1 Stringfellow: But we don't know, well, I guess what I'm
2 saying is he...

3 Aufdenkampe: What you're saying is he...

4 Stringfellow:where, no, did they look at, you know, did
5 they look at jacket water temperature and pressure and that sort
6 of thing?

7 Aufdenkampe: No.

8 Mosbaugh: No.

9 Aufdenkampe: He didn't look at much.

10 Stringfellow: Okay.

11 Mosbaugh: The machine...

12 Aufdenkampe: He was in a hurry to get power back.

13 Mosbaugh: The machine is already tripped.

14 Aufdenkampe: When in and started pressing buttons.

15 Mosbaugh: The machine is already tripped.

16 Stringfellow: His objective was to get the diesel started
17 so, uh, he-they probably thought, well, if I can clear these
18 annunciators and reset, you know, and reset the thing, then I can
19 get, you know, I can try and start it again, right?

20 Aufdenkampe: We can speculate that that's what he thought.

21 As Allen pointed out the diesel was already tripped so there
22 wasn't much to see on the gauges and stuff.

23 Stringfellow: That's a point.

24 Aufdenkampe: So.

25 Stringfellow: Yeah. Okay. But that's, in other words,
26 that's all, in-in response to Hairston's concern, that's all we

1 can-we think we can say.

2 Aufdenkampe: Yeah.

3 Stringfellow: All right.

4 Aufdenkampe: Go on to page, uh, the next page.

5 Stringfellow: Yes.

6 Aufdenkampe: Site area emergency. Was declared at 8:40.

7 Uh, agencies of the-of the emer..., uh, government agencies of the
8 emergency at 8:48 central standard time.

9 Stringfellow: Uh-huh.

10 Aufdenkampe: Period,

11 Stringfellow: Okay.

12 Aufdenkampe: And delete the next, 'n, to the end of the
13 line.

14 Stringfellow: Okay.

15 Aufdenkampe: There. Now, it doesn't-now, it doesn't ask the
16 question wh-why it took us seventeen minutes.

17 (Laughter)

18 How's that?

19 Stringfellow: Well, all right, we can try that. In other
20 words, we can't say that-that-that part of that seventeen minutes
21 was due to the problem with the ENN.

22 Aufdenkampe: Not specifically.

23 Stringfellow: Not specifically. Okay, well, I-I think that-
24 that may be okay, because Hairston said, you know, if we can't
25 say that, then he wanted to reword it, to take it-to not have the
26 time in there. Okay?

1 Aufdenkampe: Well, that takes care of that.

2 Stringfellow: Yeah.

3 Aufdenkampe: Take out the time out.

4 Stringfellow: Alright.

5 Aufdenkampe: Okay, the next one was your sentence you gave
6 me - for direct cause.

7 Stringfellow: Yeah.

8 Aufdenkampe: That went through fine and his comments about
9 an off site source went through fine Uh, the next page - root
10 cause.

11 Stringfellow: Mhmm.

12 Aufdenkampe: No comment. The next page. On the twenty
13 starts.

14 Stringfellow: Yeah yeah yeah.

15 Aufdenkampe: I'm struggling with that one.

16 Stringfellow: You struggle with that one, huh?

17 Aufdenkampe: I'm struggling with that one. I'm trying to
18 verify that still.

19 Stringfellow: Oh, okay, alright.

20 Aufdenkampe: Okay, uh, we think that it's basically a
21 material false statement.

22 Stringfellow: Really?

23 Aufdenkampe: Yeah. Well, we know for a fact that the B
24 diesel tripped at least once. After March 20th.

25 Mosbaugh: Actually, it trip-tripped twice after March 20th.
26 Or it had at least two separate problems.

1 Stringfellow: Well, do we need to take this more than 20
2 times each out than?

3 Aufdenkampe: That's what we're thinking, but I got Tom Webb
4 reviewing the-the, uh, reactor operator's log and counting.

5 Stringfellow: Okay.

6 Aufdenkampe: I don't know where he's at. When's Hairston's
7 due back in the office?

8 Stringfellow: He's supposed to be there now.

9 Aufdenkampe: Oh, so you gotta hurry and get this up here,
10 huh?

11 Stringfellow: Well, yeah, yeah. Well, I've, see, I-I have
12 given him, I-I've given Shipman, you know, uh, the ver..., a
13 typed version of what you guys have been looking at, so now-now
14 as soon as we get off the phone, I'm gonna run back in there and
15 tell him what you told me, you know?

16 Aufdenkampe: Okay. Uh, so anyway, I'm still looking for
17 words for you on that one, but what that-that sentence is gonna
18 have to change.

19 Stringfellow: Okay. What about, uh, the thing about, did
20 you get my message on your machine?

21 Aufdenkampe: Yes. I-I'm-I'm getting to that.

22 Stringfellow: Okay. I'm sorry.

23 Aufdenkampe: Next page, on corrective actions. That went-
24 went through fine.

25 Stringfellow: Okay.

26 Aufdenkampe: Okay, now, last page.

1 Stringfellow: Okay.

2 Aufdenkampe: Item six. Uh, we've reworded that one
3 substantially.

4 Stringfellow: Oh, alright.

5 Aufdenkampe: Okay, you ready?

6 Stringfellow: Yeah.

7 Aufdenkampe: Uh, 'A back up ENN system powered from the AT&T
8 systems which previously existed and was operational for South
9 Carolina agencies has been extended to include Georg, local,
10 and state agencies.'

11 Stringfellow: 'Has been extended to include Georgia and
12 local and state agencies.'

13 Aufdenkampe: Yes. Okay, and then cross out the entire last
14 sentence...and write this.

15 Stringfellow: Oh, alright. Okay.

16 Aufdenkampe: 'Instructions...have been given...to...
17 emergency directors...and communicators...concerning...use...of
18 the...emergency communication systems.'

19 Stringfellow: Systems plural?

20 Aufdenkampe: Systems - plural.

21 Stringfellow: Okay.

22 Aufdenkampe: That's what they said.

23 Stringfellow: Let me read it back. 'Instructions have been
24 given to emergency directors and communicators concerning use of
25 the emergency communication systems.'

26 Aufdenkampe: Is that right, is it? Systems? That's on that

1 George letter, do you have that? I think I got that....That-
2 that-that's-that's, if I still have it. George, uh, All n has a
3 hard time with-with using that, but...he didn't vote. (Laughter)
4 He abstained due to the lack of review time.

5 Mosbaugh: I happened to be an emergency director.

6 Aufdenkampe: Are you an emergency director?

7 Mosbaugh: Yeah.

8 Aufdenkampe: Really?

9 Mosbaug' An-an-and I-I haven't felt-feel I've been given
10 very much.

11 Aufdenkampe: But you've been given something, right?

12 Mosbaugh: I've been given one sheet that I got with my badge
13 one day.

Aufdenkampe: I can't find it.

15 Stringfellow: Well, we had systems in there before, so I
16 guess that's a-that's okay.

17 Aufdenkampe: Okay.

18 Stringfellow: Okay, uh, oh, uh, on number five, uh, they've
19 identified, instead of just saying a laboratory test program,
20 they said, uh, uh, they identified Wyle Laboratories.

21 Aufdenkampe: Yeah, that's why it got in. In addition, a
22 test program will be conducted at Wyle Laboratories.

23 Stringfellow: Okay, okay, good, you got that. Alright,
24 okay, I'm sorry. I thought maybe Shipman might have adjusted
25 something after I called you, but apparently not. Okay. Good.
26 Alright, John, I think we've-we've, uh, let's see, we're down to,

1 now, we're down to the twenty-twenty times each question.

2 Aufdenkampe You want me to hold on, see if I can get ahold
3 of, uh, Tom Wer', real quick?

4 Stringfellow: Yeah, I'll be glad to.

5 (phone dials-rings)

6 Aufdenkampe: This one is a killer.

7 Rick Odom: Hey, John.

8 Aufdenkampe: Hey, do you know if Tom Webb's, how Tom Webb's
9 doing?

10 Odom: He was, uh, heading over to the control room, ~~but he~~
11 ~~did~~ have two or three days here. And the logs?

12 Aufdenkampe: Yeah?

13 Odom: He's at the control room to fill it in.

14 Aufdenkampe: Okay. Is he gonna call back, well, who's he
15 gonna call when he finds out?

16 Odom: I think he's gonna come back, I think. Is there,
17 okay, is he going in the LER?

18 Aufdenkampe: Uh, yeah.

19 Odom: Oh, and you know this is not gonna be val-valid
20 information now? It's gonna be control room, which is, and then
21 you gotta interpret whether it's a valid start or, you know,
22 valid attempt or not.

23 Aufdenkampe: Oh, he-all-all-we aren't at, looking for valid
24 failures or invalid failures, all we're looking is for starts and
25 not-and trips. That's what he's looking at, right?

26 Odom: I told him valid failures, I said valid starts and

1 val... (?). Yeah, starts and failures is what I told him.

2 Mosbaugh: The word-the wording in the LER that came from
3 corporate did not use the word valid.

4 ? : Yeah.

5 Odom: Well, he-he can't do that anyway, log don't tell you
6 whether it's valid or not.

7 Aufdenkampe: Right.

8 Mosbaugh: Yeah.

9 Aufdenkampe: I understand. And-and that's cause ? doesn't
10 make that determination.

11 Odom: Right.

12 Aufdenkampe: Okay.

13 Odom: Okay, I'll find out where he's at.

14 Aufdenkampe: Yeah, you-you better. Jack's on the other line
15 waiting.

16 Odom: Alright.

17 Aufdenkampe: Okay. Thanks.

18 Odom: Sure.

19 (phone hangs up)

20 *PAUSE*
Aufdenkampe: You there still?

21 Stringfellow: I'm here.

22 Aufdenkampe: We don't know yet.

23 *AS*
Stringfellow: We don't know yet. But now, you know, I just-

24 it-it just dawned on me what Allen was saying a minute ago. In
25 other words, if we say 'and no failures or problems have
26 occurred during any of these starts,' you-you're saying that

1 that's not true.

2 Aufdenkampe: Yes, I'm saying that's not true.

3 Stringfellow: Oh, wonderful. Okay.

4 Aufdenkampe: So, which is also telling you that, it's
5 telling you something else I imagine. Cause you know we, this is
6 certa... been written to the NRC once already.

7 Stringfellow: Yes, I know. That-that's exactly what I was
8 thinking.

9 Aufdenkampe: So, I'm working on that.

10 Stringfellow: Alright, John. Okay, well I'll be patiently
11 waiting. Or impatiently waiting, or however you want to look at
12 it.

13 f Aufdenkampe: Okay. Well, I must be off.

14 Stringfellow: Thanks.

15 Aufdenkampe: Bye.

16 Mosbaugh: You got that other letter?

17 Aufdenkampe: Huh?

18 Mosbaugh: Do you have that, uh, do you have Hairston's,
19 uh...

20 Aufdenkampe: Yeah

21 mosbaugh: ...confirmation and action response...

22 Aufdenkampe: Yeah.

23 Mosbaugh: ...letter?

24 Aufdenkampe: Yeah.

25 Mosbaugh: Cause that's the one they, where they...

26 Aufdenkampe: Where they lied.

1 Mosbaugh: ...uh, incorporate...

2 Aufdenkampe: I mean they...

3 Mosbaugh: ...made that statement previously.

4 Aufdenkampe: Mr. Kenny, what are you doing down here sir?

5 Kenny Stokes: I come by to say hello, and see if, uh, I can
6 talk to you a little about this connoseal, blow-down question.

7 Aufdenkampe: You mean it's going to be done Friday?

8 Stokes: It's going to be done tomorrow. It may be done
9 today.

10 Mosbaugh: That-that that went to you guys?

11 Stokes: Yeah.

12 Mosbaugh: Went to Cliff and then went to you?

13 Stokes: Yeah.

4 Mosbaugh: Let me-let me see if I can't, uh, pull some, uh,
15 diesel stuff from Kochery.

16 Aufdenkampe: Okay, Ken Stokes is working on that.

17

ATTACHMENT 2

TRANSCRIPT

MOSBAUGH TAPE OF CONVERSATION B

(A conversation that allegedly occurred on April 19, 1990)

Bill Shipman:
General Manager, Nuclear Support
Southern Nuclear Operating Company
Birmingham, Alabama

Allen Mosbaugh:
Assistant General Manager
Plant Support (Acting)
Vogtle Nuclear Plant

1 (dial phone, rings)

2 Shipman: Hello.

3 Mosbaugh: Yeah, this is Allen Mosbaugh.

4 Shipman: Hey, Allen, this is Bill Shipman.

5 Mosbaugh: Say Bill.

6 Shipman: ^{Do you} ~~Are you where~~ you can talk for a minute? X

7 Mosbaugh: I am.

8 Shipman: Great. I-I-I....Help!

9 Mosbaugh: Okay.

10 Shipman: Uh, the, uh, uh, LER, we're-we're, you know, we're
11 trying to get all this Hairston's questions answered.

12 Mosbaugh: Right.

13 Shipman: Uh, there are two things, uh, I guess, uh, George
14 has asked us, you know, to-to find out, and, and, uh, I guess you
15 were, you and, you probably were with Tom at the time talking
16 with Jack and-and Jack's, uh, answered, uh, I guess, one of the
17 questions and the question has to do with, uh, when the, uh,
18 operators went into the diesel panel the first time.

Mosbaugh: Right.

2 Shipman: Uh, it has to do with whether they observed any of
3 the instrumentation or whether they just went and, and, uh,
4 noticed the annunciator's, uh, lit and reset the annunciators.
5 Uh, George has remembered hearing somewhere that-that the
6 operators looked at some pressure gauges or something for some of
7 the diesel engine, uh, functions before they reset the
8 annunciators and, you know, I don't-I don't know what the
9 operator did, b'c he's so insistent in-in trying to respond to-
10 get a response to that question. I wonder did the operator or
11 the operators who was on-on-shift or went into the diesel room at
12 that time, is on-shift now, and-and somebody could ask him a
13 direct question.

14 Mosbaugh: I'll find him and, um, we'll get him on the phone.

15 Shipman: That would be great.

16 Mosbaugh: Uh, you know, I-I-I mean, uh, he may, he may not
17 be on shift, which case we can try to reach him at home, you
18 know, we can-I can go do all that.

19 Shipman: You-you understand, Allen, that...

20 Mosbaugh: My understanding is that I don't think they looked
21 at much.

22 Shipman: I don't either.

23 Mosbaugh: Okay, I-I was in the critique, I-I don't, I did- I
24 did, uh, I did, uh, was in the meeting with Al Chaffee and the
25 team when they interviewed the operators that first responded to
5 the panel and-and I recall them talking to Al Chaffee about that.

1 Uh, but, uh, you know, they, the gist of that conversation is
 2 that they didn't scrutinize things very much, you know. And-and
 3 indeed the diesel had already tripped, so when they got into the
 4 room, it was, uh, a good number of, well, it was minutes later,
 5 and the machine had already tripped. Nobody was in the room when
 6 the machine tripped, and, uh, so all they could have observed,
 7 you know, when they got in was what remained lit at that time
 8 and-and any, uh, machine parameters that-that were still-still
 9 valid with the machine tripped. That's all that was basically
 10 available to observe. Hello? Hello?

11 (hangs up phone, dials again, rings)

12 Shipman: Hey, Allen.

13 Mosbaugh: Something happened.

14 Shipman: Something about the time you started telling me
 15 about, uh, sitting with, uh, Chaffee..

16 Mosbaugh: Yeah.

17 Shipman: We sort of left-lost you.

18 Mosbaugh: Okay (laughs), um, anyway, I was in there, and
 19 like I say, they-they didn't, you know, respond that they saw
 20 very much, indeed nobody was in the room when it tripped.

21 Shipman: Right.

22 Mosbaugh: It tripped before they got to the room. All they
 23 could have seen, all that would've been available to see, uh,
 24 would be whatever annunciators remained lit and whatever engine
 25 parameters remained valid with the machine stopped.

26 Shipman: Right.

1 Mosbaugh: So, so that doesn't, you know, leave a whole lot.

2 Shipman: Okay.

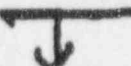
3 Mosbaugh: And-and-and I believe that, you know, they cleared
4 the annunciators, uh, you know, without-without much, uh, uh,
5 assessment.

6 Shipman: Well, I put myself in their place, and-and-and I
7 would walk in the room and say, yeah, there are some annunciators
8 lit and-and reset 'em, and all the things that would've cleared,
9 would've cleared and those that were still valid, the alarms
10 would've remained lit, and I'd a-would have gone on with trying
11 to get the diesel started. And, so I, you know, I don't...

12 Mosbaugh: Yeah.

13 Shipman: ...have a-a problem with what we got written, but
14 George does and-and, uh, I just need to get a...

15 Mosbaugh: Yeah, okay, well, let me-let me do my best there.
16 I'll try to find, see if the operator is here, uh, if he's here,
17 we'll try it again, and if he's, uh, at home, we'll try to call
18 him, and, um, you know, see if I can set that up, so we can, uh,
19 ask the questions.

20  Shipman: Okay, and the other, of course, the other question
21 we've been trying to-to get an answer to is to-to (noises)
22 reassure George we had, uh, more than 20 valid starts since, you
23 know, since March the 20th, uh, like we say in the LER.

24 Mosbaugh: Yeah, that, you realize, I think there's a problem
25 with the way that's stated because, you know, the machine, you
26 know, I-I, we can, you know, there-there, we got one of the guys

1 trying to find what the total number of-of valid starts is, but
2 there were failures.

3 Shipman: Yeah. The problem that we got, Allen, is is that
4 the data that's in the LER is what George wrote and took and told
5 to the Ebnetter last Monday in Atlanta.

6 Mosbaugh: Well, you know, if-if anybody says that, uh, there
7 weren't any failures, you know, that-that's just not true.

8 Shipman: Well, if you look at George's outline, that-that he
9 made to take to Atlanta with him, he says, at that time it was
10 like eighteen and nineteen.

11 Mosbaugh: Yeah.

12 Shipman: And, uh, and-and, without a failure.

13 Mosbaugh: Mm.

14 Shipman: So, you know, somebody had given George that
15 information, uh...

16 Mosbaugh: On the B...

17 Shipman: (?) we had a failure since George went to...?

18 Mosbaugh: No. On the B, let me-let me tell you what I know,
19 okay? On the B machine, um, on the B machine on, uh, three
20 twenty-two, at, uh, twelve forty-three, the machine tripped on

21 ↑ high lube oil temperature.

22 Shipman: Caused by what?

23 Mosbaugh: Caused by the switch that gives you high lube oil
24 temperature probably (laughs).

25 Shipman: No, I understand that, but did we-did we not have,
6 uh...

1 Mosbaugh: I-I don't believe high-a high temperature physical
2 condition existed. I-I, uh, I believe....

3 Shipman: Was that a valid, considered a valid failure?

4 Mosbaugh: I haven't assessed these for being valid or not.

5 Shipman: You see, because I could, we could-we could solve
6 the problem that's created by that information by saying 'no
7 valid failures.'

8 Mosbaugh: Let me, uh, let me find, I think we got one other
9 one. Um, here it is. On three twenty-three at seventer- thirty-
10 one, machine tripped on low, this is B machine again, on low
11 jacket water pressure slash turbo lube oil pressure low.

12 Shipman: Okay, the-the first one was on what date did you
13 say?

14 Mosbaugh: Three twenty-two.

15 Shipman: Okay, how-how, you know, with that data, um, uh, I
16 think this things already been to the PRB a couple of times. How
17 in the world did it get through the PRB?

18 Mosbaugh: What's that?

19 Shipman: The statement.

20 Mosbaugh: The LER or...

21 Shipman: Yeah, the LER.

22 Mosbaugh: Well, I mean...

23 Shipman: Did that-that data not, was not available in the
24 PRB?

25 Mosbaugh: The previous times that this LER went through the
26 PRB, I'm not sure if those statements were in there.

1 Shipman: Yeah, Jack says yeah they were.

2 Mosbaugh: They were?

3 Shipman: Yeah.

4 Stringfellow: In fact, the last PRB added the parenthetical
5 phrase a 'more than twenty times each'. I say the last, not
6 today, but the previous PRB.

7 Mosbaugh: You-you know, this thing, it came to the PRB, you
8 know, fifteen pages long, the first time, and then it was, you
9 know, basically tabled for a complete rewrite back to eight
10 pages. And, uh...

11 Stringfellow: It went back to the PRB as eight pages.

12 Mosbaugh: And then it went back as eight. And, uh...

13 Shipman: Well...

14 Mosbaugh: Anyway...

15 Shipman:...(unintelligible) that whole question is
16 immaterial, and, you know, it's just that, it's just sort of a
17 bother, but, uh, what-what we need to do is find out what's
18 correct and make sure we only say what's correct.

19 Mosbaugh: Yeah, I, now I, you know, what I have here is-is,
20 uh, there was a tabulation made of diesel activities, you know,
21 early on, uh, by Kochery, and-and that's where I'm getting this
22 information from, and, uh, I believe these, uh, I believe this
23 tabulation was provided to the Chaffee team.

24 Shipman: (cough) Well, the, uh, uh, I think people have been
25 reviewing the diesel generator log, but-but that's, but only
26 because we thought the other day that only went through the

1 thirteenth....(unintelligible)

2 Mosbaugh: Yeah.

3 Shipman: (unintelligible). Somebody did save it.

4 Mosbaugh: Yeah, this data picks up on the thirteenth.

5 Shipman: Yeah, somebody, gosh, somebody must have looked.

6 Uh-uh, Allen, would you take that as a-as a second thing and-a d
7 try to give me the correct information for that? Sounds like
8 this whole statement needs to be just stricken.

9 Mosbaugh: You know, I-I-I basically don't have any better
10 information than the two, than the two trips, uh, that I told you
11 about on the, uh, twenty-second and...

12 Stringfellow: Okay, are you-can we-can we determine if they
13 are valid, if those are valid tests or valid failures?

14 Mosbaugh: Let me-let me talk to, uh, Stokes and Kochery
15 about 'em.

16 Shipman: Yeah, I-I guess, uh, oh, in the point we're in now,
17 where this thing has been in the, in PRB several times and we've
18 had several review cycles up here and everybody's, uh, gotten
19 accustomed to seeing that data, if-if-if-the we could use the
20 data we probably ought to, if it's certain, if it's not a valid
21 statement, we-then we need to get it the heck out of here,
22 regardless of what George has told, uh, Ebnetter. So, you know,
23 if (noises) if there's anything you need to do to check to make
24 sure that the data you have from Paul is-is correct and valid,
25 uh, would ask that you do that. Or if you feel very confident
26 that it is correct now, I just need to see what I need to do

about striking this statement.

2 Mosbaugh: Okay, I, you know, I-I feel this is the best-the
3 best data there is, and I-I believe it's accurate. I will verify
4 with Kochery though.

5 Shipman: Okay.

6 Mosbaugh: And I will, uh, pursue trying to get, uh, a
7 conversation with the operator.

8 Shipman: Okay. Jack and I are going to leave here and walk
9 down to Mr. Hairston's office to, uh, go over his comments
10 and what we've been able to do with those and, uh, try to, you
11 know, finish beating out what he wants to do to this thing. Uh,
12 and if, so if you want to, you know, find somebody and want to
13 call back, you might just, you might just call down there.

14 Mosbaugh: What's the number?

15 Shipman: 5581.

16 Mosbaugh: Okay.

17 Shipman: That's right. Okay.

18 Mosbaugh: Will do. We're-we're-we are in to the-the
19 torsional test.

20 Shipman: Great. We are in to it.

21 Mosbaugh: Yeah, we-we spun the machine up to 1800, had a
22 little problem with the, uh, a, um, seal oil, uh, emergency pump
23 coming on, adjusted to the set point, and, uh, we're, uh, we're
24 back down, uh...

25

ATTACHMENT 3

Reduced legal to Letter 5.2e

①

Intro: Thanks

~~Party members~~

Background

Education NE ^{Commercial Nuclear}

Experience 16 yrs, 5 utilities

Whistleblower last thing

~~Whistleblower last thing~~

~~Whistleblower last thing~~

~~Whistleblower last thing~~

1984 ^{1st} Supt. 60-70 mg good place

Then 1988 wholesale mgmt change

~~Whistleblower last thing~~

I moved up Promoted 3x in 4 years of GRC

At time blew whistle I was 2 highest level mgmt

350 per GRC & mgmt

Willful Violations

late 1989 dec on Dir Values + 5 viol

Concluded willfully crimial felony

Drafted ammoun alleg. & sent

Not go directly for fear of leaks of my identity

Wait so far as fingerprint PO mail

Additionally

In this alleg express concern Major Accident

Initial NRC response prompt and appropriate OI invest

OI found willful

Then NRC actions slowed & ^{became} watered down

but finally issued & paid \$100,000

(2)

Mgmt Response

a week or so after submit

~~Attitude~~

~~Attitude~~

Attitude change

Back stabbing feeling

Questioning as to source

Need to get out. (I now know they suspected me)

Then DL me DL values - Agency rep w/arc advised

All this oral & few notes

Protect myself, Doc Descrie, Doc Safety.

Considered

~~Return~~ to Tape - Deny One Party.

I sign Security Law GOC's ^{extensive} Taping of plant on my's homes

~~Return~~

Legal Home review by EPC's agency that justified it

Proc/Policy Review / others used tape, There were none

~~Return~~

I began taping

Site Area

Major Accident

Total Blackout of safety that could have led to melt

TMI - Cleanable

Bad but what I learned there after was

• Direct prob known for years / had to fall NAC

• SB false statements to NAC about prob. to start back up.

~~Return~~

3 major false statements after launch of "first"

senators ^{key} statements ^{considered}

I informed ^{that the person} ~~signature~~

the signed it anyway. ~~Return~~

Mgmt action

I pushed getting statements corrected

After put correct in mail / ~~Return~~

Renew PRB

Renew job

~~Handwritten scribble~~

~~Large handwritten scribble~~

Complain to DOL 6-4

(3)

Confidential Info to NRC 6-13

At this point I didn't ^{tell} ~~give~~ NRC of tapes. I know somehow ~~that~~ ^{the} fact would leak. I gave NRC detailed writings based on tapes.

~~Handwritten scribble~~

Deposition ^{is part of DOL proceeding} only sent ~~Handwritten scribble~~

Told GPC of existence of tapes. ^{Tried to get wrong thing}

Tapes to NRC

As soon as GPC ^{learn} ~~found~~ tapes ^{given} ~~to~~ NRC

Suspension

Filing

Closing

Impudence

Who are these people who having made false statements to NRC & under oath.

EEA

The highest ^{exec} mgrs over 6 Nov Breact

Key person are Advance Rk Cousins.

Now Gen.

~~Large handwritten scribble~~

(4)

~~Nuclear professional~~
I am ~~an~~ ~~engineer~~ ~~professional~~

Followed my New Train - Don De
No Detail too small

Followed my Conscience - I'm proud, I did right
thing, Did it benefit me

Naren would have done it if had it risen
to criminal level / I had to / if crossed
the line

I'm a very good engineer an honest citizen
and for blowing whistle doing the right thing
I lost job / career / unemployed
since ~~the day~~

I live on wife's salary 24k
support wife & children (school age)
I am fear for my family's future my doctors
and broken.

Therefore, this law is broken it doesn't
work

The burden too great, the climb too long
The mountain too high

~~Just because we're in a hurry to get the
the ~~bill~~ ~~passed~~ ~~it~~ ~~isn't~~ ~~the~~ ~~right~~ ~~thing~~
~~to~~ ~~do~~ ~~it~~ ~~isn't~~ ~~the~~ ~~right~~ ~~thing~~~~

- Senators Thank you - for allow me to testify

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

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 1993 a copy of
Intervenor's Response to the Second Set of Interrogatories of
Georgia Power Company was served via First Class Mail upon the
following:

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

Administrative Judge
Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Charles A. Barth, Esq.
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Atlanta, GA 30308-2216

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

Before Administrative Judges:
Peter B. Bloch, Chair
Dr. James H. Carpenter
Thomas D. Murphy

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

AFFIDAVIT OF ALLEN L. MOSBAUGH

My name is Allen L. Mosbaugh and I am over the age of 18. The following statements are made under the pains and penalties of perjury and are true and correct to the best of my knowledge and belief.

1. I am the intervenor in the above-captioned proceeding.
2. I hereby certify that the statements and opinions set out in Intervenor's response to Georgia Power's Second Set of Interrogatories are true and correct to the best of my personal knowledge and belief.

AFFIANT SAYETH FURTHER NOT,

Allen L. Mosbaugh
Allen L. Mosbaugh

Aug. 11, 1993
Date

[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

(* Original and two copies)

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

By:



Michael D. Kohn
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054\cert.dt