

September 15, 1993

Exhibit 72, page 1 of 25

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.	50-424-OLA-3
)		50-425-OLA-3
GEORGIA POWER COMPANY)		
<i>et al.</i>)	Re:	License Amendment
)		(Transfer to Southern Nuclear)
(Vogtle Electric Generating Plant,)		
Units 1 and 2))		

NRC STAFF SUPPLEMENTAL RESPONSE TO INTERVENOR'S
FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

In a filing dated August 9, 1993,¹ the Staff indicated that it would voluntarily respond to certain portions of "Intervenor's First Set of Interrogatories and Request for Documents to the Staff of the Nuclear Regulatory Commission," dated June 24, 1993, (Intervenor's First Request). The Staff hereby responds to Interrogatories 4, 5.d, 6-10, and 12-21 and Document Request 5 to the extent the Request seeks documents related to diesel generator reliability.

As a preliminary matter, the Staff notes that it is not required to respond to Intervenor's discovery request absent prior findings by the Board that such response should be required, pursuant to 10 C.F.R. § 2.720(h)(2)(ii) (interrogatories)² and

¹ NRC Staff Response to Motion to Compel Answers to Intervenor's First Discovery Requests, dated August 9, 1993.

²10 C.F.R. § 2.720(h)(2)(ii) provide that "[u]pon a finding by the presiding officer that answers to the interrogatories are necessary to a proper decision in the proceeding and that answers to the interrogatories are not reasonably obtainable from any other source, the presiding officer may require that the Staff answer the interrogatories."

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424/425-OLA-3 EXHIBIT NO. I n + II-72

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

Staff Applicant Intervenor Other

Identified Received Rejected Reporter CR

to 07-06-95 Witness Mosbaugh

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PDR ADDCK 05000424
G PDR

10 C.F.R. § 2.744 (d) (requests for production of documents).³ By responding to the instant discovery request, the Staff does not waive its right to require that the appropriate procedures be followed and that the required findings be made, pursuant to 10 C.F.R. § 2.720(h)(2)(ii) and 10 C.F.R. § 2.744(c) and (d), before responding to any future discovery requests. The Staff continues to object to Interrogatories and Document Requests that call for disclosure of information that is available from another source, draft agency documents, enforcement materials, or other information that is exempt from disclosure under the Commission's regulations and NRC case law. Information not available for inclusion in this response will be provided in a supplemental response.

I. ANSWERS TO INTERROGATORIES

INTERROGATORY 4

Was the oral presentation of George Bockhold, to Region II on April 9, 1990, regarding the number of successful starts of the Vogtle diesel generators A and B, relied upon by the NRC in lifting the hold imposed by NRC on Vogtle Unit 1 power operations?

- a. Please state why it was or was not relied upon.

RESPONSE (P. Skinner)

Yes. The oral presentation of George Bockhold, to Region II on April 9, 1990, regarding the number of successful starts of the Vogtle diesel generators A and B, relied

³10 C.F.R. § 2.744(c) provides that if the Executive Director for Operations (EDO) objects to projects to producing a record or document, the requesting party must make written application to the presiding officer to compel production, and the document is then to be reviewed *in camera* by the presiding officer. 10 C.F.R. § 2.744(d) provides that the presiding officer must determine that (1) the document or record is relevant, (2) its production is not exempt from disclosure under § 2.790, or if exempt, that its disclosure is necessary to a proper decision in the proceeding, and (3) the information contained in the record or document is not reasonably obtainable elsewhere, before ordering the EDO to produce the document.

upon by the NRC in lifting the hold imposed by NRC on Vogtle Unit 1 power operations. This, however, was only a part of the information used by the NRC to reach a decision to lift the hold.

a. At the time of this meeting, although the NRC had monitored portions of the emergency diesel testing, the NRC did not have all the details of the result of this testing. The NRC did rely upon the information provided by Georgia Power Company (GPC). The restriction on Unit 1 operation was lifted based on the information provided by GPC in the letter dated April 9, 1990, the GPC presentation in Region II on April 9, 1990, assessment of the licensee's activities by the NRC Incident Investigation Team (IIT), and input from Region II staff involved in reviews of the actions taken in response to the Confirmation of Action Letter (CAL), dated March 23, 1990.

INTERROGATORY 5

With respect to the oral presentation of George Bockhold, to Region II on April 9, 1990, describe in detail:

a. Who was present at the oral presentation?

* * *

d. Please identify any and all specific statements of George Bockhold that were relied upon in the decision to lift the hold.

RESPONSE (P. Skinner)

a. The attendees are listed in Enclosure 1 of the meeting summary set forth in a letter from Luis A. Reyes, NRC, to GPC, dated May 14, 1990. This document is available in the NRC Public Document Room.

d. The specific statements that George Bockhold made during the April 9, 1990, meeting cannot be recalled. Mr. Bockhold, however, used slides during his oral presentation. A copy of the slides are included as Enclosure 2 to the May 14, 1990, meeting summary referenced in Interrogatory 5.a, above.

INTERROGATORY 6

Was the April 9, 1990, Confirmation of [A]ction letter [response] signed by George Hairston, relied upon by the NRC when deciding to lift the hold on the Vogtle Unit 1 power operations?

a. If the answer is yes, describe or identify the specific statements contained [in] the COA letter which the NRC relied upon for that decision.

RESPONSE (P. Skinner)

Yes.

a. The NRC relies on a licensee's statements to the NRC, whether verbal or written, to be complete and accurate concerning any subject discussed between the licensee and the NRC. Therefore, the NRC did rely upon all statements contained in GPC's April 9, 1990, response to the NRC CAL. However, the NRC also independently verifies the effectiveness of a licensee's efforts associated with licensed activities. With respect to GPC's completion of required activities defined in the CAL of March 23, 1990, NRC personnel (IIT, Region II inspectors, resident inspectors), had conducted independent inspections, and maintained oversight of the efforts being taken to address issues that were required to be corrected prior to lifting the restrictions on Vogtle Unit 1 operation.

INTERROGATORY 7

Is it permissible for a licensee to establish Diesel Generator reliability through "non-valid tests" under any provisions set out in the code of federal regulations; Branch Technical Position EICSB 2 Diesel Generator Reliability Qualification Testing; Regulatory Guide 1.106; Generic Letter 84-15; or any other NRC regulations and guidance?

- a. If the answer is yes (or a qualified yes) with respect to any source stated above:
 - i. identify any and all specific provision(s) providing; and
 - ii. provide a detailed statement setting forth the reason(s) why.

RESPONSE (O. Chopra)

No. The reliability of diesel generators is based upon the number of failures in the last 100 valid tests. Non-valid tests are excluded from the database when assessing the reliability of diesel generators. Examples of non-valid tests include those tests that are attributed to operator error, to spurious operation of a trip that is bypassed in the emergency mode, or to a malfunction of equipment that is not operative in the emergency mode or is not part of the defined diesel generator unit design. These examples and others that constitute non-valid tests are given in Position C.2.e of Regulatory Guide 1.108.

INTERROGATORY 8

At the time the hold on Vogtle Unit 1 was lifted after the Site Area Emergency, was it the NRC's understanding that the diesel start data presented in the oral presentation and stated in the COA [Response] was not based on "valid tests?"

- a. State in detail exactly what was the NRC's understanding with respect to whether the COA [Response] and oral presentation was or was not based on "valid tests" when it reviewed LER 90-006 on April 19, 1990.

RESPONSE (P. Skinner)

When the hold on Vogtle Unit 1 was lifted after the Site Area Emergency, the NRC understood that the diesel start data presented in the oral presentation, and stated in GPC's April 9, 1990, response to the CAL was not based on "valid tests." NRC personnel involved in monitoring the diesel generator testing understood that the testing addressed in the oral presentation and GPC's April 9, 1990 response was based on some starts that did not meet the criteria specified in Regulatory Guide (RG) 1.108, which defines "valid tests." In addition, during the GPC's presentation on April 9, 1990, the NRC asked GPC to explain how "successful starts" compared to valid tests.

a. At the time it reviewed the GPC's response to the CAL and GPA's original LER 90-006, the NRC understood that the referenced number of starts were not "valid tests" as defined in RG 1.108.

INTERROGATORY 9

Was it the NRC's understanding that the "successful start" and "starts without problems or failures" data contained in the April 9, 1990, presentation, the COA [response] and the LER 90-006, referred to consecutive starts?

RESPONSE (P. Skinner)

Yes.

INTERROGATORY 10

After the failure of the diesel generator system caused the March 20, 1990 Vogtle Site Area Emergency, Did the NRC question the reliability of the diesel generators?

a. If the answer is yes, was the licensee required to "requalify" the diesel generators per Regulatory Guide 1.106?

i. If the answer to this subpart is no, please state why not.

RESPONSE (O. Chopra)

Yes, the NRC asked questions about the reliability of the diesel generators after March 20, 1990. Many of the Staff's questions were associated with the failure of Calcon jacket water temperature trip sensors -- the most probable cause of the trips during the event. During the visit of the NRC's IIT at the Vogtle site beginning March 26, 1990, the NRC Staff recognized that Vogtle previously had a history of several Calcon sensor failures since 1985.

a. No. By "'requalify' the diesel generators per Regulatory Guide 1.106," the NRC Staff assumes this question asks whether the licensee was required to requalify the diesel generator in accordance with Table 4.8-1 of the Vogtle Technical Specifications (TS). Regulatory Guide 1.106, "Thermal Overload Protection for Electric Motors or Motor-Operated Valves," is not related to diesel generator testing.

i. The answer is no because, in accordance with TS Table 4.8-1, requalification of the diesel generator is required only if a diesel generator undergoes a complete overhaul to like-new condition.

INTERROGATORY 11:

How did Vogtle re-establish the NRC required 95% per diesel generator reliability goal before the NRC gave permission to resume power operations?

RESPONSE (O. Chopra)

The NRC has no requirement that a licensee establish any reliability goal for the diesel generators as a condition for restarting the plant. The NRC did not require GPC to re-establish a 95% per diesel generator reliability goal before the NRC gave permission to resume power operation of Vogtle on April 12, 1990. The NRC's concern was to assure that the licensee performed a detailed analysis of the diesel generator failures and implemented effective corrective actions in response to these failures.

INTERROGATORY 12

Under NRC regulations, how many consecutive successful starts of Vogtle's Diesel generators were required to re-establish the necessary reliability and to grant permission to resume power operations?

RESPONSE (O. Chopra)

As noted in the answer to Interrogatory 11, the NRC has no requirement that a licensee establish any reliability goal for its diesel generators before restart of the plant. Consequently, no specific number of consecutive successful starts of Vogtle's diesel generators had to be demonstrated for the NRC to grant permission to restart. However, GPC is required to comply with the Vogtle Technical Specifications, including TS Table 4.8-1. In accordance with this table, if a diesel generator has five (5) or more failures in its last 100 valid tests (five failures in the last 100 tests constitute a point estimate reliability of 95% for that diesel generator), the test frequency of that diesel generator is changed from monthly to weekly. The weekly testing frequency is maintained until no more than four failures have occurred in that diesel generator's last 100 valid tests. Increasing the test frequency, as required by Table 4.8-1, provides for

a more timely accumulation of additional test data upon which to assess the performance of the diesel generator.

INTERROGATORY 13

Might the fact that only two or three valid tests of each of the plant Vogtle diesels were conducted by GPC prior to GPC's requesting permission to resume power operations have effected the NRC's decision to grant that request?

RESPONSE (O. Chopra)

No. The NRC's decision to grant the request for restart was not based on the performance of a specific number of valid tests. It was based upon an analysis of root cause of the diesel generator failures and upon the licensee's corrective actions in response to the failures.

INTERROGATORY 14

Was the NRC promptly informed by GPC that Vogtle's Unit 1 diesel generator tripped seven (7) times on May 23, 1990 by the same CALCON switches that were suspected of causing the March 20, 1990 Site Area Emergency?

- a. If NRC was ever informed, please state:
 - i. the date.
 - ii. the time of the contact.
 - iii. the individual(s) within the NRC who were contacted.

RESPONSE (P. Skinner)

Yes.

a(i). On June 22, 1990, GPC reported the May 23, 1990, generator failure as required by TS 4.8.1.1.3 and 6.8.2. This report did not specify that the diesel generator

tripped seven times. The report attributed the failure to the jacket water temperature switches and indicated that the failures were corrected.

In addition, the Resident inspectors were informed by GPC Deficiency Card (DCI-90-256) system (see NRC Inspection Report 50-424,425/90-13 dated July 23, 1990).

a(ii). The time of contact, based on Special Report 1-90-04, was a few days after its date of issuance, June 22, 1990. The time of contact regarding the Deficiency Card 1-90-256 is not known, but would have been after May 23, 1990, and before June 29, 1990 (the end of the inspection period for the above-referenced inspection report).

a(iii). The Special Report was provided to the NRC Document Control Desk. The Deficiency Card report was provided to the NRC resident inspectors (Messrs. R.F. Aiello and R.D. Starkey).

INTERROGATORY 15

Did the NRC order Vogtle shut down after multiple repeat failures of the diesel generator was caused by the CALCON switches after the plant resumed operation?

a. If the answer is no, please state why not.

RESPONSE (D. Matthews)

No.

a. On July 10, 1990, the NRC issued Vogtle Amendments 31 (Unit 1) and 11 (Unit 2) allowing the high jacket water temperature (HJWT) trip, derived from Calcon sensors, to be bypassed to minimize the potential for spurious diesel generator trips in

the emergency start mode. The licensee had earlier decided that, given previous operating experience, particularly the March 20, 1990 event and difficulties experienced with HJWT trips, the prudent course of action in terms of enhanced plant safety was to bypass the HJWT trip for emergency starts.

Specifically, on May 23, 1990, the Unit 1 "B" diesel generator failed a surveillance requirement due to the failure of the HJWT sensors. These sensors were new and had been recently installed and calibrated in accordance with the revised calibration procedure that incorporated the lessons learned from laboratory tests. The licensee entered a 72 hour action statement, promptly notified the NRC of its intentions to install a modification to manually bypass the HJWT trip, and requested an expedited change to TS 4.8.1.1.2h(6)(c). On May 25, 1990, the licensee submitted an application for license amendments to change the Vogtle Technical Specifications accordingly. The NRC agreed that bypassing the HJWT trip for emergency starts was a prudent course of action and, largely because of a concern for the previous unfavorable performance of these particular Calcon sensors, issued a Temporary Waiver of Compliance on May 25, 1990, from TS 4.8.1.1.2h(6)(c) until the TS amendment could be processed.

INTERROGATORY 16

Does NRC consider diesel control air quality to be "satisfactory" for plant Vogtle where the dew point is above 50°F, as described in GPC's response to Generic Letter 84-15 issued by NRC?

RESPONSE (P. Skinner)

No. The Staff does not consider diesel control (starting) air quality to be "satisfactory" or acceptable for plant Vogtle where the dew point is above 50°F as

described in GPC's response to Generic Letter 84-15 issued by NRC. The Staff reviews the starting air quality for emergency diesel generators in accordance with the guidance as described in the Standard Review Plan, Section 9.5.6, Emergency Diesel Engine Starting System, which states, in part, that:

Starting air should be dried to a dew point of not more than 50°F when installed in a normally controlled 70°F environment, otherwise the starting air dew point should be controlled to at least 10°F less than the lowest expected ambient temperature.

The Vogtle starting air system conforms to the design requirements reflected in the Standard Review Plan. Since the purpose of maintaining the dew point temperature below 50°F to preclude moisture damage to components, if the dew point exceeds this temperature for a short period of time, an inspection could be performed of the components which would indicate what, if any, damage has occurred during the period(s) that the dew point was greater than 50°F.

INTERROGATORY 17

Was the information contained in the COA letter [response] regarding diesel control air dew points partially relied upon by the NRC when NRC decided to lift the hold on power operations imposed after the March 20, 1990 Site Area Emergency?

RESPONSE (P. Skinner)

Yes. See response to Interrogatory 4, above.

INTERROGATORY 18

Does NRC consider operational history of the Vogtle diesel generators which includes prolonged periods where the air system dryers are out of service to be satisfactory?

- a. Produce all documents NRC has concerning the operational history of the Vogtle diesel generators.

RESPONSE (P. Skinner)

Yes. This issue was, in part, the subject of an NRC inspection conducted at Vogtle between August 6 through 17, 1990, and documented in Inspection Report 50-424,425/90-19, Supplement 1. The issue was based on an allegation received by Region II personnel, which indicated that GPC had no basis for its conclusion regarding the air quality of the diesel generator starting air system and misrepresented the air quality in the licensee's written response to the CAL of March 23, 1990. The inspection team concluded that the licensee did have an adequate basis to assess the quality of the diesel generator starting air system. This conclusion was based primarily upon records of the visual inspection of the air system components for degradation. Since the term "prolonged" is not defined, the only consideration that has been given to this system is based on the inspection discussed above.

- a. The Staff continues to object to producing "all documents" concerning the operational history of the Vogtle diesel generators. This information is available from other sources, including GPC and documents in the PDR.

INTERROGATORY 19

Did NRC know that diesel control air dew point was above the limit of acceptable operation (pre-GPC response to the Generic Letter) because the dryers were again out of service during the days proceeding and following the 4-9-90 presentation by GPC in response to the Site Area Emergency?

- a. If not, would this information have been considered material to the decision making process of the NRC

with respect to the resumption of power operation after the Site Area Emergency.

RESPONSE (P. Skinner)

The NRC did not know whether diesel generator control air dew point was above the limit of acceptable operation before GPC's response to the Generic Letter. However, the NRC's IIT reviewed diesel support systems as part of the inspection effort at Vogtle after the Site Area Emergency of March 20, 1990. Based on their findings, as discussed in Section 3.2.2 of NUREG-1410, "Loss of Vital AC Power and the Residual Heat Removal System During Mid-Loop Operations at Vogtle Unit 1 on March 20, 1990," dated June 1990, air quality did not appear to be a factor in the emergency diesel generator response during the Site Area Emergency. This area was again reviewed as part of the NRC's operational team inspection conducted between August 6 and August 17, 1990, and the findings were reported in Inspection Report 50-424,425/90-19, Supplement 1, issued November 1, 1991.

INTERROGATORY 20

Did the NRC interpret the following statement made by GPC to NRC prior to the resumption of power operation after the Site Area Emergency: "Initial reports of higher than expected dew points were later attributed to faulty instrumentation" to mean that the unacceptably high dew points reported in the days prior to and on 4-9-90 resulted from readings of faulty measuring device(s) and that the actual control air dew points were within specification (i.e., less than 50°F)?

RESPONSE (P. Skinner)

Yes.

INTERROGATORY 21

Did the NRC consider GPC's assertion that "Initial reports of higher than expected dew points were later attributed to faulty instrumentation" to be material to NRC's deliberative process when NRC decided to lift the hold on power operations?

RESPONSE (P. Skinner)

Yes. See the response to Interrogatory 4.

DOCUMENT REQUEST 5

[Produce] [a]ll documents, including interview statements obtained during the August 1990 OSI Inspection, and any and all other interviews statements obtained by NRC by anyone since 1988 (including interview statements related to Yonkers and Fuchko).

RESPONSE (L. Robinson)

Documents in possession of the Office of Investigations identified below are being withheld from disclosure pursuant to 10 C.F.R. § 2.790 (a)(i) and (v) as disclosure might jeopardize the ongoing investigation and contemplated enforcement action.

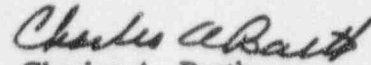
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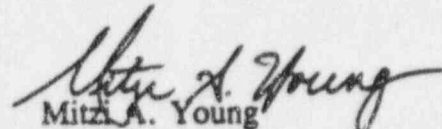
<u>No.</u>	<u>Description</u>
1 & 2	Transcripts of Interview of Allen L. MOSBAUGH, dated July 18 and 19, 1990.
3	Transcript of Interview of GPC employee, dated August 14, 1990.
4	Transcript of Interview of GPC employee, dated June 14, 1993.
5	Transcript of Interview of GPC employee, dated August 14, 1990.
6	Transcript of Interview of GPC employee, dated June 22, 1993.

- 7 Transcript of Interview of Southern Nuclear Company (SNC) employee, dated June 14, 1993.
- 8 Transcript of Interview of SNC employee, dated June 23, 1993.
- 9 Transcript of Interview of GPC/SNC employee, dated June 30, 1993.
- 10 Transcript of Interview of SNC employee, dated June 21, 1993.
- 11 Transcript of Interview of GPC/SNC employee, dated June 25, 1993.
- 12 Transcript of Interview of Southern Company Services (SCS) employee, dated June 16, 1993.
- 13 Report of Interview of NRC employee, dated September 5, 1991.
- 14 Report of Interview of NRC employee, dated August 28, 1991.
- 15 & 16 Reports of Interviews of NRC employee, dated July 17, 1991, and February 27, 1992.
- 17 Transcript of Interview of GPC employee, dated June 28, 1993.
- 18 Transcript of Interview of SNC employee, dated July 6, 1993.
- 19 Report of Interview of NRC employee, dated September 3, 1991.
- 20 Report of Interview of DOE employee, dated August 28, 1991.
- 21 Transcript of Interview of SNC employee, dated June 29, 1993.
- 22 Report of Interview of NRC employee, dated September 5, 1991.
- 23 Transcript of Interview of Advanced Reactor Corp. employee, dated July 1, 1993.
- 24 Transcript of Interview of SNC/GPC employee, dated June 11, 1993.

- 25 Report of Interview of NRC employee, dated September 4, 1991.
26 Report of Interview of NRC employee, dated August 30, 1991.

Respectfully submitted,


Charles A. Barth
Counsel for NRC Staff


Mitzi A. Young
Senior Supervisory
Trial Attorney

Dated at Rockville, Maryland
this 15th day of September 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of	*	Docket Nos. 50-424-OLA-3
	*	50-425-OLA-3
GEORGIA POWER COMPANY,	*	
et al.	*	ASLBP No. 93-671-01-OLA-3
	*	
	*	Re: License Amendment
	*	(Transfer to Southern
	*	Nuclear)

AFFIDAVIT

I, Pierce H. Skinner, being duly sworn, state as follows:

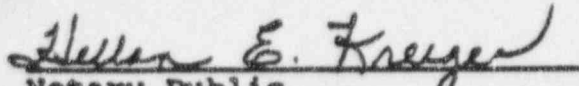
1. I am employed by the U.S. Nuclear Regulatory Commission, Region II. I serve as a Section Chief in the Division of Reactor Projects.

2. I responded to Interrogatories 4, 5a, 5d, 6, 8, 9, 14, 16, 17, 18, 19, 20 and 21 contained in the "NRC Staff's First Supplemental Response to Intervenor's Interrogatories and Request For Production Of Documents" dated September 15, 1993. In preparing my responses, I have consulted with NRC personnel who were involved with the issues. My responses represent present opinion regarding events that occurred over three years ago.

3. The information contained in the attached answers to Interrogatories 4, 5a, 5d, 6, 8, 9, 14, 16, 17, 18, 19, 20 and 21 is true and correct to the best of my knowledge and belief.


Pierce H. Skinner

Sworn and subscribed to before
me this 15th day of September, 1993.


Notary Public

Notary Public, Cobb County, Georgia
My Commission Expires April 1, 1998

My Commission expires: _____

September 15, 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

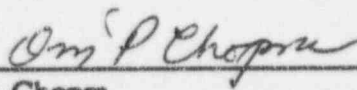
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
GEORGIA POWER COMPANY) Docket Nos. 50-424-OLA-3
et al.) 50-425-OLA-3
(Vogtle Electric Generating Plant,) Re: License Amendment
Units 1 and 2) (Transfer to Southern Nuclear)

AFFIDAVIT

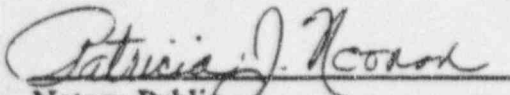
I, Om Chopra, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation. I serve as a senior electrical engineer within the Electrical Engineering Branch, Division of Engineering.
2. I responded to Interrogatories 7, 10, 11, 12, and 13 contained in the "NRC Staff's Supplemental Response to Intervenor's First Set of Interrogatories and Request for Production of Documents," dated September 15, 1993.
3. The responses to Interrogatories 7, 10, 11, 12, and 13 are true and correct to the best of my knowledge and belief.



Om Chopra

Sworn and subscribed to before me
this 15th day of September 1993



Notary Public
My commission expires: March 1, 1994

September 15, 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY)	50-425-OLA-3
<i>et al.</i>)	
)	Re: License Amendment
(Vogtle Electric Generating Plant,)	(Transfer to Southern Nuclear)
Units 1 and 2))	

AFFIDAVIT

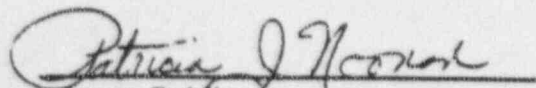
I, David B. Matthews, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation. I serve as the Project Director of Project Directorate II-3 within the Division of Reactor Projects - I/II.
2. I responded to Interrogatory 15 contained in the "NRC Staff Supplemental Response to Intervenor's First Set of Interrogatories and Request for Production of Documents," dated September 15, 1993.
3. The response to Interrogatory 15 is true and correct to the best of my knowledge and belief.



David B. Matthews

Sworn and subscribed to before me
this 15th day of September 1993



Notary Public

My commission expires: March 1, 1994

September 15, 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY
et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

)
) Docket Nos. 50-424-OLA-3
) 50-435-OLA-3
)
) Re: License Amendment
) (Transfer to Southern Nuclear)
)

AFFIDAVIT

I, Larry L. Robinson, being duly sworn, state as follows:

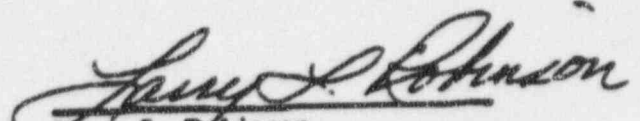
1. I am employed by the U.S. Nuclear Regulatory Commission, Office of Investigations. I serve as a Senior Investigator in the Atlanta Field Office of Investigations.
2. I provided the list of documents identified in response to Document Request 5 in the "NRC Staff Supplemental Response to Intervenor's First Set of Interrogatories and Request for Production of Documents," dated September 15, 1993.
3. The listing of transcripts of interviews relating to diesel generator reliability after the March 20, 1990, site area emergency is true and correct and complete

Larry L. Robinson

- 2 -

September 15, 1993

to the best of my knowledge and belief for documents within the possession of the Office of Investigations.


Larry L. Robinson

Sworn and subscribed to before me
this 15th day of September 1993



Notary Public

Notary Public, Cobb County, Georgia
My Commission Expires April 1, 1998

My commission expires: _____

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GEORGIA POWER COMPANY, *et al.*) Docket Nos. 50-424-OLA-3
) 50-425-OLA-3
(Vogtle Electric Generating Plant)
Units 1 and 2) Re: License Amendment
) (Transfer to Southern Nuclear)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SUPPLEMENTAL RESPONSE TO INTERVENOR'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system this 15th day of September 1993.

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U.S. Nuclear Regulatory Commission
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Panel
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