

December 20, 1993
DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'95 SEP -8 P4:05

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: Licensee Amendment
)	(Transfer to Southern Nuclear)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

INTERROGATORY RESPONSE OF THE NRC STAFF
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993,
FIRST SET OF INTERROGATORIES AND SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS

On October 8, 1993, the Georgia Power Company (GPC) served Interrogatories upon the Staff, designating named persons to disclose information known to them regarding possible issues in this proceeding. Without waiving any of its rights under 10 C.F.R. Part 2, the Staff has responded to the GPC interrogatories. Attached hereto and made a part herein are sworn responses by Alfred E. Chaffee, Stewart D. Ebnetter, Milton D. Hunt, Peter A. Taylor, Alan R. Herdt, Leigh Trocine, Ronald Aiello, Douglas Starkey, and John Rogge. The response of Kenneth E. Brockman is not attached as Mr. Brockman's extensive official travel and other NRC duties have delayed his response, which we anticipate will be filed within one week, i.e., by December 27, 1993.

The Staff objects to Interrogatory 9 which asks "the NRC staff's current opinions . . . regarding the character . . ." of named GPC present and former employees. The NRC as a collective whole does not in the normal course of business formulate an opinion as to the integrity of named persons whose work is subject to the Atomic Energy

NUCLEAR REGULATORY COMMISSION

Docket No. 50-424-425-OLA-3 EXHIBIT NO. INT II-106

In the matter of See Town/Vogtle

Staff Applicant Intervenor Other

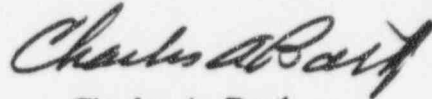
Identified Received Rejected Reporter WLV

Date 8-10-95 Witness MOSBAUGH

Act. Further, the issue here is not the character of particular individuals, but whether the proposed transferee organization has the necessary attributes to receive a license.

The Staff objects to Interrogatory 10 as it calls for premature disclosure of information gathered by the Office of Investigations during the course of an investigation.

Respectfully submitted,



Charles A. Barth
Counsel for NRC Staff

Attachments: As indicated

Dated at Rockville, Maryland
this 20th day of December 1993

December 17, 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, <i>et al.</i>)	50-425-OLA-3
)	
(Vogtle Electric Generating Plant)	Re: Licensee Amendment
Units 1 and 2))	(Transfer to Southern Nuclear)
)	

INTERROGATORY RESPONSE OF JOHN F. ROGGE
TO THE OCTOBER 8, 1993, GEORGIA POWER COMPANY'S
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of PENNSYLVANIA)
COUNTY of MONTGOMERY)

John F. Rogge, having first been duly sworn, hereby states as follows:

I am employed by the Nuclear Regulatory Commission as Chief, Reactor Projects Section in its King of Prussia, Pennsylvania Regional Office.

On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed between March 20, 1990, and April 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which the intervenor has alleged that GPC knowingly submitted incorrect information to the NRC regarding diesel starts following the March 20, 1990, site incident (LER-90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990). Having been so informed as to the background of the interrogatories, I respond here to that interrogatory which refers to me.

INTERROGATORY 7

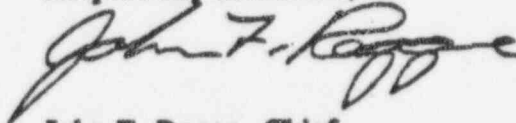
Describe in detail the entire recollection of any of the NRC Resident Inspectors, stationed at Plant Vogtle in April and May of 1990 (including Ms. Lee Trocine and Messrs. Ron Aiello, Doug Starkey and John Rogge), of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990, with respect to diesel generator starts or problems. Identify all documents which describe or refer to any such discussions.

RESPONSE

During the time period specified, April and May 1990, I was the Senior Resident Inspector of the Vogtle Facility. However, at that time I was detailed to the Office of the Executive Director for Operations in Rockville, Maryland. I knew nothing "of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990, with respect to diesel generator starts or problems." I did not participate in NRC's investigation of diesel generator reliability after the March 20, 1990, site incident.

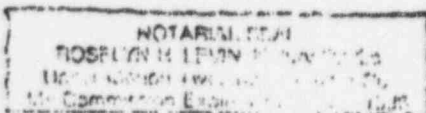
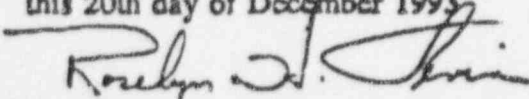
This response is true and correct to the best of my knowledge and belief.

Respectfully submitted,



John F. Rogge, Chief
Reactor Projects Section
Division of Reactor Projects
NRC Region I

Subscribed and sworn to before me
this 20th day of December 1993.



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)	Re: License Amendment
Units 1 and 2))	(Transfer to Southern
)	Nuclear)

INTERROGATORY RESPONSE OF STEWART D. EBNETER
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993,
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE OF GEORGIA)
COUNTY OF FULTON)

Stewart D. Ebneter, having first been duly sworn, hereby states as follows:

I am the Regional Administrator of the Nuclear Regulatory Commission's (NRC) Region II office in Atlanta, Georgia. I served in this position in the spring of 1990. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed between March and June of 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which an intervenor has alleged that GPC knowingly submitted incorrect information to the NRC (in LER 90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990) regarding diesel generator starts following the March 20, 1990, site incident. Having been so informed as to the background of the interrogatories, I respond here to those interrogatories which refer to me.

INTERROGATORY 1

Describe in detail the information or knowledge obtained by [Stewart D. Ebnetter] on or before April 9, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990.

RESPONSE

I do not have any specific or detailed knowledge of EDG problems associated with sensors/switches except that provided during staff briefings and meetings. I do recall that regional staff (Milton Hunt) was either on site at Vogtle or in contact with the site during the testing/analysis of sensor problems, and on several occasions, (dates unknown) I was briefed on the status and progress of our inspection and oversight activities. I do not have any documentation of the briefings, but there may be some reference to them in inspection reports or as part of meeting records.

INTERROGATORY 2

Describe in detail the additional information or knowledge obtained by [Stewart D. Ebnetter] on or before April 19, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensor/switches after March 20, 1990.

RESPONSE

I do not have any additional information or knowledge regarding problems associated with Plant Vogtle Unit 1 diesel generator sensors/switches beyond that discussed above in my response to Interrogatory 1.

INTERROGATORY 5

Describe in detail Mr. Stewart D. Ebnetter's entire recollection of the substance and circumstances of the following telephone conversations:

- a. All calls between Mr. Ebnetter and Mr. W. George Hairston, III, GPC, on May 14, 1990.

b. All calls between Mr. Ebneter and Mr. Hairston or about May 24, 1990, concerning diesel generator starts or problems.

c. All calls between Mr. Ebneter and Mr. Hairston on or about June 14, 1990 concerning diesel generator starts or problems.

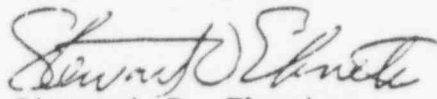
d. Identify all documents which in any way relate to any of the foregoing telephone conversations.

RESPONSE

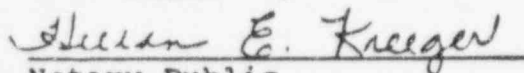
I cannot recall either the exact dates or many of the specifics of telephone conversations between me and Mr. Hairston during the timeframes indicated. I do recall that Mr. Hairston called me shortly after the Region II restart meeting to advise that they were doing a QA (Quality Assurance) review of the Emergency Diesel Generator start data and would send a revised LER if it was appropriate to do so. I have no documents relating to any of our telephone conversations.

These responses are true and correct to the best of my knowledge and belief.

Respectfully submitted,


Stewart D. Ebneter
Regional Administrator
NRC, Region II

Sworn and suscribed to before me
this 17th day of December, 1993


Notary Public

My Commission expires:

Notary Public, Cobb County, Georgia
My Commission Expires April 1, 1995

December 17, 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

INTERROGATORY RESPONSE OF ALFRED E. CHAFFEE
TO THE OCTOBER 8, 1993, GEORGIA POWER COMPANY'S
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of MARYLAND)
COUNTY of MONTGOMERY)

Alfred E. Chaffee, having first been duly sworn, hereby states as follows:

I am employed by the U.S. Nuclear Regulatory Commission as Chief, Events Assessment Branch, Division of Operating Reactor Support, Office of Nuclear Reactor Regulation.

In the spring of 1990, I was appointed Team Leader for the Incident Investigation Team (IIT) that reviewed the site emergency which occurred on March 20, 1990, at the Vogtle site. The IIT also reviewed the licensee's trouble shooting and event investigation actions of the March 20, 1990 event which occurred subsequent to the site emergency. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed between March 20, 1990, and April 1990. I have been informed in general terms by Staff counsel that the interrogatories result from

an administrative proceeding in which the intervenor has alleged that GPC knowingly submitted incorrect information to the NRC regarding diesel starts following the March 20, 1990, site incident (LER-90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990). Having been so informed as to the background of the interrogatories, I respond here to those interrogatories which refer to me.

INTERROGATORY 1

Describe in detail the information or knowledge obtained by the following persons on or before April 9, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990:

RESPONSE

Almost all of what I, and I believe my team members know, is set forth in NUREG-1410, entitled "Loss of Vital AC Power and the Residual Heat Removal System During Mid-LOOP Operations at Vogtle Unit 1 on March 20, 1990." I was connected by telephone from Bethesda, Maryland for most if not all of the meeting held in Atlanta, Georgia on April 9, 1990, between GPC and NRC. By April 9, 1990, I was aware that the 1A diesel generator did not always start and operate as expected as evidenced by the two failures on March 20, 1990. See Appendices I and J to NUREG-1410. Based on a review of NUREG-1410 in preparation for preparing this document it appears to me that at some point in the IIT investigation we were aware that a large number of starts had occurred on the 1A diesel after the two failures on March 20, 1990 and all of these starts occurred without a repeat of the failures which occurred on March 20, 1990. As to the total number of starts and their bearing on the declaration of the 1A diesel generator as being operable, I do not believe the IIT focused on this issue as it was not

a part of the IIT charter. As to the presentation by the licensee on April 9, 1990, regarding diesel generator starts, I was unaware that the numbers presented were incorrect as I had no reason at that time to challenge the accuracy or veracity of those numbers. In addition based on a recent review of the slides used in the licensee's presentation on April 9, 1990, it appears to me that the slides correctly represent what the IIT understood in general terms at that time (i.e., a large amount of testing on the 1A diesel had been completed with no reproduction of a failure) thus providing no obvious basis for challenging the number of starts alluded to in the licensee's presentation. As of April 9, 1993, I was unaware of any count of starts or attempted starts done by the IIT of any Vogtle diesel generator. I was aware that the licensee, in association with the vendor, was investigating why diesel generator 1A tripped twice on March 20, 1990. I was also aware that the high jacket water temperature switches were being carefully analyzed.

INTERROGATORY 2

Describe in detail the additional information or knowledge obtained by the following persons on or before April 19, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990:

RESPONSE

This interrogatory seeks what additional information I acquired between April 9, 1990, and April 19, 1990. I reviewed NUREG-1410; bibliography item number 205, Transcript: Telephone Conference with IIT, Licensee, R-II (April 7, 1993) and bibliography item number 206 Transcript: Telephone Conference with IIT, Licensee (April 9, 1990). Based on this review, it appears to me that the licensee had completed

all 1A diesel generator starts prior to April 9, 1990, which were associated with the determination of the root cause for the failure of the 1A diesel generator on March 20, 1990. It also appears and I recall that licensee personnel continued to work on why the Calcon sensors failed after completion of the diesel start testing. However, by April 19, 1990, I do not remember making a tabulation of starts or attempted starts from any particular date.

NUREG-1410, Appendix J Page J-20 paragraph four states: "At this point, the licensee had started emergency diesel generator 1A approximately 21 times since the incident with no abnormal operating conditions or trip or trip alarms."

"At this point" refers to the completion of the Operability Test which I believe occurred prior to April 9, 1990. I do not remember when this information was developed by, I believe Rick Kendall, or when it came to my attention. However since we were not focusing on post event diesel start numbers, I probably was not either aware or conscious of this data until after April 19, 1990.

INTERROGATORY 3

Did NRC procedure in March 1990 including any procedures utilized by the Augmented Inspection team (AIT) or the Incident Investigation Team (IIT), sent to Plant Vogtle in March 1990, require the AIT or IIT to make records of telephone calls or communications with Georgia Power personnel? If so, describe in detail and identify the procedure.

A. Did AIT and IIT personnel keep such records?

RESPONSE

The only procedures I am aware of that existed while this event was being investigated by the IIT during March 1990 were NUREG-1303 "Incident Investigation Manual" dated February 1988 and NRC Manual Chapter NRC-0513 "NRC Incident

Investigation Program" dated August 5, 1987. Manual Chapter 0513 dated August 5, 1987, states that AEOD will develop a variety of procedures including a procedure for interviewing and a procedure for collecting and maintaining documents, records, data and other information into an investigation manual. The referred to manual is NUREG-1303. NUREG-1303 gives guidance in the area of keeping records such as transcripts or notes for interviews conducted by IIT personnel. This guidance indicates that interviews should be documented and discussions about administrative activities will not be documented. The IIT did keep such records in the form of transcripts of, I believe, all significant interactions (interviews) between the team and those personnel interviewed. All these records are to the best of my knowledge in the Public Document Room. The guidance did not directly address phone calls. It should also be noted that the IIT did not transcribe all followup interactions (interviews) but we did attempt to get all significant information transcribed when possible.

These responses are true and correct to the best of my knowledge and belief.

Respectfully submitted,

Alfred E. Chaffee

Alfred E. Chaffee, Chief
Events Assessment Branch
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Subscribed and sworn to before me
this 17th day of December 1993

Carol L. Augustino

CAROL L. AUGUSTINO
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires January 17, 1994

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
(Vogtle Electric Generating Plant) 50-425-OLA-3
Units 1 and 2) Re: License Amendment
(Transfer to Southern
Nuclear)

INTERROGATORY RESPONSE OF MILTON D. HUNT
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE OF GEORGIA)
COUNTY OF FULTON)

Milton D. Hunt, having first been duly sworn, hereby states as follows:

I am employed by the Nuclear Regulatory Commission (NRC), Region II, Atlanta, Georgia as a Reactor Inspector. I served in this position in the spring of 1990. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed in March and April of 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which an intervenor has alleged that GPC knowingly submitted incorrect information to the NRC (in LER 90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990) regarding diesel generator starts following the March 20, 1990, site incident. Having been so informed as to the background of the interrogatories, I respond here to those interrogatories which refer to me.

INTERROGATORY 1

Describe in detail the information or knowledge obtained by [Milton D. Hunt] on or before April 9, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensor/switches after March 20, 1990.

RESPONSE

3-23 start 2

I arrived on site the afternoon of March 27, 1990, to witness the testing of the 1B Emergency Diesel Generator (EDG) prior to the licensee declaring it operational after the maintenance outage. Once this was completed, the troubleshooting process to determine the cause for the failure of the 1A EDG to start on the Loss of Offsite Power (LOOP) began. [The testing revealed that the failure of the water jacket temperature sensors to properly seal off, caused the pneumatic control system for the diesel engine to trip the engine after a pre-set time delay.] This occurred during the LOOP because the starting requirements for the EDG did not at that time require the EDG to start on an emergency start signal, but instead a normal start signal was given to start the EDG. An emergency start signal overrides the tripping function of the water jacket temperature sensors. This was the method used by the licensee to finally start 1A EDG when the LOOP occurred.

During the remainder of the week until late on March 31, 1990, when I left the site, I observed the testing of several of the special sensors that make up the alarm and pneumatic control system for the diesel engine. The testing performed included calibration of the water jacket temperature sensors. Due to the medium in which the sensor is installed, that being water, there were questions as to how these sensors should actually be calibrated.

No mention of
H₂O

There seemed to be no set method for calibration of the sensors. I believe the manufacturer of the sensors sent a representative to the site at some time during this period to help in the calibration activities.

I returned to the site on April 3, 1990, to observe the GPC's testing activities to get the 1A EDG into operation so that it could be declared operational. Various special tests were performed to insure that the EDG controls were functional and would perform as intended. Several smaller problems were identified and corrected as well as recalibration of all the EDG instrumentation and controls equipment. Numerous engine starts were witnessed during this period up through April 7, 1990, when I left the site. On April 9, 1990, I attended a meeting in Region II wherein GPC made a presentation showing the actions they had taken to correct the problems with the EDGs many of which I had witnessed. I heard Mr. Bockhold's presentation regarding starts of the diesel generator. I was unaware that the numbers he presented were incorrect if they were, as I had no reason at that time to challenge the accuracy or veracity of those numbers.

INTERROGATORY 2

Describe in detail the additional information or knowledge obtained by [Milton D. Hunt] on or before April 19, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990.

RESPONSE

I do not recall or have any additional knowledge or information regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches beyond that discussed in Interrogatory 1 above.

I do recall hearing that tests were going to be conducted to determine the failure mode for the water jacket sensors. These tests were performed at Wiley Labs but after April 19, 1990.

These responses are true and correct to the best of my knowledge and belief.

Respectfully submitted,

Milton D. Hunt

Milton D. Hunt
Reactor Inspector, Division of
Reactor Safety
NRC, Region II

Sworn and subscribed to before me
this 19th day of December, 1993

Nelson E. Krueger
Notary Public

My Commission expires:

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

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
(Vogtle Electric Generating Plant) 50-425-OLA-3
Units 1 and 2) Re: License Amendment
(Transfer to Southern
Nuclear)

INTERROGATORY RESPONSE OF PETER A. TAYLOR
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE OF GEORGIA)
COUNTY OF FULTON)

Peter A. Taylor, having first been duly sworn, hereby states
as follows:

I am employed by the Nuclear Regulatory Commission (NRC),
Region II, Atlanta, Georgia as a Reactor Inspector. I served in
this position in the spring of 1990. On October 7, 1993, Georgia
Power Company (GPC) served interrogatories upon the NRC which
called for information I possessed on or about June 14, 1990. I
have been informed in general terms by staff counsel that the
interrogatories result from an administrative proceeding in which
an intervenor has alleged that GPC knowingly submitted incorrect
information to the NRC (in LER 90-06 and at a meeting in NRC's
Atlanta, Georgia office on April 9, 1990) regarding diesel
generator starts following a March 20, 1990, site incident. Having
been so advised of the background of the interrogatories, I respond
here to the interrogatories which refer to me.

INTERROGATORY 1

Describe in detail the information or knowledge obtained by [Peter A. Taylor] on or before April 9, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990.

RESPONSE

On April 5, 1990, I was requested by my Section Chief in the Test Programs Section to travel to Plant Vogtle to observe Technical Specification surveillance operability tests of Unit 1 emergency diesel generators (EDG). I arrived at the plant on the morning of April 6, 1990 and met with NRC Inspector Milton Hunt. He briefed me on Unit 1 EDG's status and the schedule for EDG surveillance testing. This general briefing given to me by Mr. Hunt constitutes the extent of my knowledge regarding Plant Vogtle Unit 1 EDGs after March 20, 1990.

On the evening of April 6, 1990, Mr. Hunt and I witnessed a Technical Specification operability test of Unit 1, EDG 1A. The test was performed using the normal plant surveillance test procedure. My observations of test activities indicated that EDG 1A voltage, frequency, electrical load and test duration met surveillance procedure requirements. I identified no problems or concerns during the test. On the morning of April 7, 1990, Mr. Hunt and I arrived on site to observe additional surveillance tests of EDGs. GPC indicated² that no further tests were planned. We left Plant Vogtle on April 7, 1990.

2347
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was UV w/o air Pak
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Also 14980-1
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marked for ST

INTERROGATORY 2

Describe in detail the additional information or knowledge obtained by [Peter A. Taylor] on or before April 19, 1990, regarding Plant Vogtle Unit 1 emergency diesel generator problems associated with diesel generator sensors/switches after March 20, 1990.

RESPONSE

On April 9, 1990, I attended a meeting between GPC personnel and the NRC in the Region II office. GPC made a slide presentation concerning the March 20, 1990 event and the corrective actions taken. I attended the meeting for the purpose of answering questions concerning the surveillance test I observed on April 6, 1990. No questions were asked of me. A slide was presented at this meeting concerning EDG tests. I recall that the slide listed troubleshooting tests, maintenance tests and engineering tests to check diesel generator sensors/switches. The slide indicated that a number of these tests were satisfactory, approximately 18 or 20 each for Unit 1 EDGs. The slides were not meaningful to me, as I had no knowledge or information concerning diesel generator problems associated with diesel generator sensors/switches.

These responses are true and correct to the best of my knowledge and belief.

Respectfully submitted,

Peter A. Taylor

Peter A. Taylor
Reactor Inspector
Division of Reactor Safety
NRC, Region II

Sworn and subscribed to before me
this 14th day of December, 1993

Shelton E. Kreeger
Notary Public

My Commission expires:

Notary Public, Cobb County, Georgia
My Commission Expires April 1, 1996

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
(Vogtle Electric Generating Plant) 50-425-OLA-3
Units 1 and 2) Re: License Amendment
(Transfer to Southern
Nuclear)
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INTERROGATORY RESPONSE OF ALAN R. HERDT
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993,
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of GEORGIA)
COUNTY of FULTON)

Alan R. Herdt, having first been duly sworn, hereby states as follows:

I am employed by the Nuclear Regulatory Commission (NRC) as Chief, Branch 3, Division of Reactor Projects, Region II, Atlanta. I served in this position in the spring of 1990. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed on or about June 14, 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which an intervenor has alleged that GPC knowingly submitted incorrect information to the NRC (in LER 90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990) regarding diesel generator starts following a March 20, 1990, site incident. Having been so advised of the background of the interrogatories, I respond here to the interrogatory which refers to me.

INTERROGATORY 6:

Describe in detail Mr. Alan R. Herdt's entire recollection of the substance and circumstances of all telephone conversations he had with Mr. Shipman on or about June 14, 1990 concerning diesel generator starts or problems. Identify all documents which in any way relate to any such telephone conversations.

RESPONSE

I do not recall having any telephone conversations with Mr. Shipman on or about June 14, 1990, concerning diesel generator starts or problems. Further, a review of my personal calendar for the relevant time period indicates that I was on vacation from June 13, 1990 to June 24, 1990 in Nova Scotia, Canada.

This response is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Alan R. Herdt

Alan R. Herdt
Chief, Branch 3, Division of
Reactor Projects
Region II

Sworn and subscribed to before me
this 16th day of December, 1993

Helen E. Kreeger
Notary Public

My Commission expires:

Notary Public, Cobb County, Georgia
My Commission Expires April 1, 1995

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, et al.)	50-425-OLA-3
(Vogtle Electric Generating Plant)	Re: License Amendment
Units 1 and 2))	(Transfer to Southern
)	Nuclear)

INTERROGATORY RESPONSE OF LEIGH TROCINE
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993,
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE OF GEORGIA)
COUNTY OF FULTON)

Leigh Trocine, having first been duly sworn, hereby states as follows:

I am employed by the Nuclear Regulatory Commission (NRC), Region II, Atlanta, Georgia as a Resident Inspector. In the spring of 1990, I was the Project Engineer for the Vogtle Electric Generating Plant. On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed in April of 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which an intervenor has alleged that GPC knowingly submitted incorrect information to the NRC (in LER 90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990) regarding diesel generator starts following the March 20, 1990, site incident. Having been so informed as to the background of the interrogatories, I respond here to those interrogatories which refer to me.

INTERROGATORY 7

Describe in detail the entire recollection of any of the NRC Resident Inspectors stationed at Plant Vogtle in April and May of 1990 (including Ms. Lee [sic] Trocine and Messrs. Ron Aiello, Doug Starkey and John Rogge), of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems. Identify all documents which describe or refer to any such discussions.

RESPONSE

I do not recall having any discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to the NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems.

This response is true and correct to the best of my knowledge and belief.

Respectfully submitted,

Leigh Trocine
Leigh Trocine
Resident Inspector
NRC, Region II

Sworn and subscribed to before me
this 20 day of December, 1993

Cheryl A. Kelly
Notary Public

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
(Vogtle Electric Generating Plant) 50-425-OLA-3
Units 1 and 2) Re: License Amendment
, transfer to Southern
Nuclear)

INTERROGATORY RESPONSE OF RONALD F. AIELLO
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE OF GEORGIA)
COUNTY OF FULTON)

Ronald F. Aiello, having first been duly sworn, hereby states
as follows:

I am employed by the Nuclear Regulatory Commission (NRC),
Region II, Atlanta, Georgia as a Senior Reactor Engineer. In the
spring of 1990 I served as Acting Senior Resident Inspector for the
Vogtle Nuclear Generating Plant. On October 7, 1993, Georgia
Power Company (GPC) served interrogatories upon the NRC which
called for information I possessed in March and April of 1990. I
have been informed in general terms by Staff counsel that the
interrogatories result from an administrative proceeding in which
an intervenor has alleged that GPC knowingly submitted incorrect
information to the NRC (in LER 90-06 and at a meeting in NRC's
Atlanta, Georgia office on April 9, 1990) regarding diesel
generator starts following the March 20, 1990, site incident.
Having been so informed as to the background of the
interrogatories, I respond here to those interrogatories which
refer to me.

INTERROGATORY 7

Describe in detail the entire recollection of any of the NRC Resident Inspectors, stationed at Plant Vogtle in April and May of 1990 (including Ms. Lee [sic] Trocine and Messrs. Ron Aiello, Doug Starkey and John Rogge), of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems. Identify all documents which describe or refer to any such discussions.

RESPONSE

I do not recall having any discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to the NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems.

Respectfully submitted,



Ronald F. Aiello
Senior Reactor Engineer, Division
of Reactor Safety
NRC, Region II

Sworn and subscribed to before
me this 13th day of December, 1993


Notary Public

My Commission expires:

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

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
(Vogtle Electric Generating Plant)	50-425-OLA-3
Units 1 and 2))	Re: License Amendment
)	(Transfer to Southern
)	Nuclear)

INTERROGATORY RESPONSE OF ROBERT D. STARKEY
TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993,
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of GEORGIA)
COUNTY of FULTON)

Robert D. Starkey, having first been duly sworn, hereby states
as follows:

I am employed by the Nuclear Regulatory Commission (NRC),
Region II, Atlanta as a Resident Inspector at the Vogtle Electric
Generating Plant. I served in this position in the spring of 1990.
On October 7, 1993, Georgia Power Company (GPC) served
interrogatories upon the NRC which called for information I
possessed in April of 1990. I have been informed in general terms
by Staff counsel that the interrogatories result from an
administrative proceeding in which an intervenor has alleged that
GPC knowingly submitted incorrect information to the NRC (in LER
90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9,
1990) regarding diesel generator starts following the March 20,
1990, site incident. Having been so informed as to the background
of the interrogatories, I respond here to those interrogatories
which refer to me.

INTERROGATORY 7

Describe in detail the entire recollection any of the NRC Resident Inspectors stationed at Plant Vogtle in April and May of 1990 (including Ms. Lee Trocine and Messrs Ron Aiello, Doug Starkey and John Rogge), of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral and written statements to NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems. Identify all documents which describe or refer to any such discussions.

RESPONSE

I do not recall having any discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to the NRC on April 9 or 19, 1990 with respect to diesel generator starts or problems.

This response is true and correct to the best of my knowledge and belief.

Respectfully submitted,

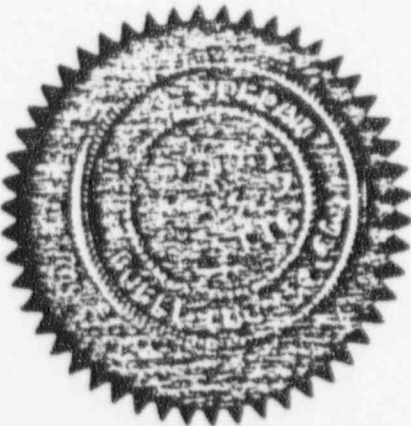
Robert D. Starkey

Robert D. Starkey
Resident Inspector
NRC, Region II

Sworn and subscribed to before me
this 10th day of December, 1993

Ella H. Jordan
Notary Public

My Commission expires: 4-8-95



December 20, 1993

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

INTERROGATORY RESPONSE OF JOHN F. ROGGE
TO THE OCTOBER 8, 1993, GEORGIA POWER COMPANY'S
FIRST SET OF INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS TO THE NRC STAFF

STATE of PENNSYLVANIA)
COUNTY of MONTGOMERY)

John F. Rogge, having first been duly sworn, hereby states as follows:

I am employed by the U.S. Nuclear Regulatory Commission (NRC) as Chief, Reactor Projects Section, Division of Reactor Projects, in its King of Prussia, Pennsylvania Region I Office.

On October 7, 1993, Georgia Power Company (GPC) served interrogatories upon the NRC which called for information I possessed between April and May, 1990. I have been informed in general terms by Staff counsel that the interrogatories result from an administrative proceeding in which the intervenor has alleged that GPC knowingly submitted incorrect information to the NRC regarding diesel starts following the March 20, 1990, site incident (LER-90-06 and at a meeting in NRC's Atlanta, Georgia office on April 9, 1990). Having been so informed as to the background of the interrogatories, I respond here to the interrogatory which refers to me.

INTERROGATORY 7

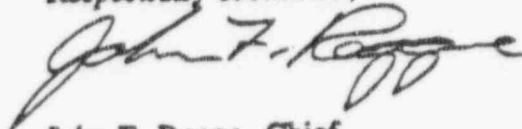
Describe in detail the entire recollection of any of the NRC Resident Inspectors, stationed at Plant Vogtle in April and May of 1990 (including Ms. Lee Trocine and Messrs. Ron Aiello, Doug Starkey and John Rogge), of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990, with respect to diesel generator starts or problems. Identify all documents which describe or refer to any such discussions.

RESPONSE

During the time period specified, April and May 1990, I was the Senior Resident Inspector of the Vogtle Facility. However, at that time I was detailed to the Office of the Executive Director for Operations in Rockville, Maryland. I knew nothing "of the substance and circumstances of all discussions with Mr. George Bockhold, Jr. concerning GPC's oral or written statements to NRC on April 9 or 19, 1990, with respect to diesel generator starts or problems." I did not participate in NRC's investigation of diesel generator reliability after the March 20, 1990, site incident.

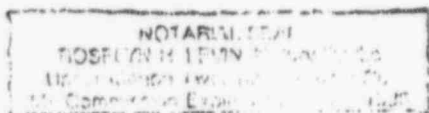
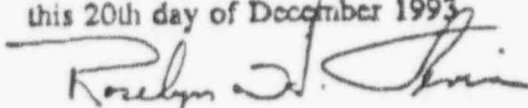
This response is true and correct to the best of my knowledge and belief.

Respectfully submitted,



John F. Rogge, Chief
Reactor Projects Section
Division of Reactor Projects
NRC Region I

Subscribed and sworn to before me
this 20th day of December 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.*)
)
(Vogtle Electric Generating Plant) Re: License Amendment
Units 1 and 2) (Transfer to Southern Nuclear)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERROGATORY RESPONSE OF THE NRC STAFF TO GEORGIA POWER COMPANY'S OCTOBER 8, 1993, FIRST SET OF INTERROGATORIES AND SECOND 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, or as indicated by a double asterisk by facsimile this 20th day of December 1993.

Peter B. Bloch, Chairman**
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: EW-439
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555
(301) 492-7285

Judge James H. Carpenter
933 Green Point Drive
Oyster Point
Sunset Beach, NC 28468

Thomas D. Murphy*
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: EW-439
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555
(301) 492-7285

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Office of Commission Appellate
Adjudication*
Mail Stop: OWFN-16/G15
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Adjudicatory File* (2)
Atomic Safety and Licensing Board
Panel
Mail Stop: EW-439
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Atomic Safety and Licensing Board
Panel*
Mail Stop: EW-439
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Office of the Secretary* (2)
Attn: Docketing and Service
Mail Stop: OWFN-16/G15
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555


Charles A. Barth
Counsel for NRC Staff