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October 12, 1995

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of	:	
	:	Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY, <u>et al.</u>	:	50-425-OLA-3
	:	
	:	Re: License Amendment
(Vogtle Electric Generating Plant,	:	(Transfer to
Units 1 and 2)	:	Southern Nuclear)
	:	
	:	ASLBP NO. 93-671-OLA-3

GEORGIA POWER COMPANY'S RESPONSE TO INTERVENOR'S
MOTION TO STRIKE THE AFFIDAVIT OF HARVEY HANDFINGER

On September 28, 1995, Georgia Power Company provided an affidavit for Harvey Handfinger at the suggestion of, and in an attempt to address a question by, the Licensing Board.¹ If the Board does not need this affidavit, or does not find it sufficiently useful, Georgia Power Company would not oppose Intervenor's Motion to Strike the Affidavit of Harvey Handfinger (October 5, 1995) ("Intervenor's Motion"). However, should the Board decide to admit the Affidavit, Georgia Power strongly

¹ Mr. Handfinger's Affidavit (September 28, 1995), marked as GPC Exhibit II-208 (Tr. 15442), was requested by Chairman Bloch on August 15, when Mr. Handfinger was on the stand. "Mr. Handfinger, in order to save time, we wouldn't need you to come back again if you were to submit an affidavit in response to that question." Tr. 11445. Chairman Bloch requested that the affidavit explain why one Maintenance Work Order ("MWO") (No. 29003028; GPC Exh. II-150B) contained a Class C cleanliness data sheet that did not appear to be included in the other MWOs which were used to perform the repair work on the diesel air start valves in July 1990. Tr. 11444-45. Mr. Handfinger's Affidavit was provisionally admitted into evidence on September 28, 1995, subject to a written motion to strike. Tr. 15443.

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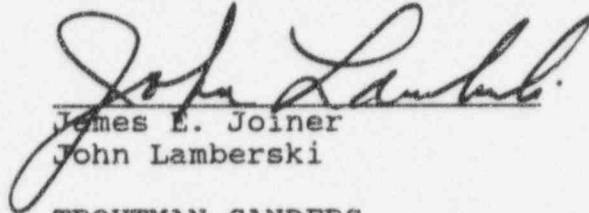
opposes Intervenor's request for an opportunity to cross-examine Mr. Handfinger. Mr. Handfinger's Affidavit addresses a tangential topic that is not sufficiently related to the issues to warrant any delay for further cross-examination.

While Georgia Power would not oppose striking the Affidavit if the Board concludes it is unnecessary, Georgia Power does not agree with Intervenor's assertions that the Affidavit (1) is unresponsive to Chairman Bloch's request, and (2) incorrectly attempts to equate cleanliness procedures to housekeeping procedures.

Georgia Power believes Mr. Handfinger's Affidavit is responsive to Chairman Bloch's request. The Affidavit explains that the only reason a Class C cleanliness data sheet was included in one of the MWOs is that there was a work item (removal of the air and lube oil lines to the air start distributor) which called for Class C cleanliness. The Affidavit further explains that, in Mr. Handfinger's opinion, the procedures on cleanliness and housekeeping were complied with. Georgia Power reads this Affidavit as stating that there was no requirement to attach cleanliness data sheets to the other MWOs.

Georgia Power believes Mr. Handfinger's Affidavit does not "equate" housekeeping procedures and cleanliness procedures. Rather, we read the Affidavit as stating that, as between those procedures, it was appropriate to apply the housekeeping procedures and not the cleanliness procedures to the air start valve repair work to be performed.

Respectfully submitted



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Dated: October 12, 1995

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NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
GEORGIA POWER COMPANY,
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(Vogtle Electric Generating Plant,
Units 1 and 2)

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Docket Nos. 50-424-OLA-3
50-425-OLA-3

Re: License Amendment
(Transfer to Southern Nuclear)

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

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