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Educational Campaign for a Prosperous Georgia

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DOCKETED
ENR/C

In the Matter of

'84 OCT 12 P2:29

Georgia Power Company, et al.

(Vogtle Electric Generating Plant, Units 1 and 2)

OFFICE OF SECRETARY
DOCKETING SECTION
BRANCH

Docket Nos. 50-424 and 50-425 (OL)

Morton B. Marguiles, Chairman
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Gustave A. Linenberger, Jr.
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

October 10, 1984

Dear Sirs,

Enclosed is GANE/CPG's proposed Revision of Contention 8, as requested by the Board. Also enclosed is an addition to the basis of this contention describing new information concerning breakdowns in the Company's procurement program.

As the Board requested, representatives of ECPG and GANE met with representatives of the Applicant and the Staff to attempt to reconcile our differences on these matters. Sensitive to the Board's point that "they [the Applicants and Staff] and we have a right to know more specifically what is to be litigated," ECPG/GANE worked out a more specific proposal for Revised Contention 8 (Attachment 3), which we presented to the Applicant and Staff at a meeting on October 3 at the offices of the Applicant's Atlanta law firm.

CPG explained to the Applicant's counsel that CPG had dropped the broader language of GANE's contention only because GANE agreed to pursue it; CPG's expert therefore focused on the welding as an example of general quality assurance/quality control breakdown. In no way was CPG's narrow language meant to imply that CPG felt the other aspects of the contention should be abandoned; on the contrary, CPG and GANE were informally dividing the contention in a manner similar to the Board's later suggestion that we combine our work (as we have now done). CPG in fact strongly supported GANE's Contention 8 language.

CPG and GANE presented the language in Attachment 3 hereto to provide the Applicant and Staff with "the objective of rewording [the contention] in a manner that is susceptible to more focused litigation" as the Board directed.

The Applicant refused to accept this language; the counsel for the Staff explained that he had been unable to prepare for the meeting and had few comments. Upon further discussion, the Staff and Applicant agreed to allow CPG and GANE to meet separately to attempt to further narrow the focus of our QA/QC contention. We withdrew several items from the proposed contention and presented it to the Applicant and Staff as we are now sending it to you. The Applicant refused to accept this language although we believe that it fulfills the requirements of the

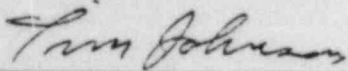
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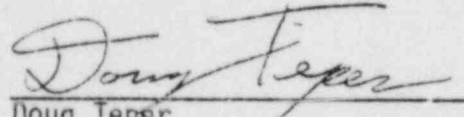
Board's directive. A clear basis has been presented for it in its entirety and in each component of it.

Co-Petitioners Campaign for a Prosperous Georgia and Georgians Against Nuclear Energy have gone to great lengths to achieve the Board's directive by narrowing the focus of our proposed Contention 8. The safe operations of the facility require that an adequate QA/QC program be assured at Plant Vogtle. The issues we have raised must be addressed if this assurance is to be obtained.

Respectfully submitted this 10th day of October, 1984,



Tim Johnson
Tim Johnson
Campaign for a Prosperous Georgia



Doug Teper
Doug Teper
Georgians Against Nuclear Energy

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