

17349

DOCKETED
USNRC

December 12, 1995

'95 DEC 13 P2:47

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	1425
GEORGIA POWER COMPANY,)	Docket Nos. 50-424 ¹ -OLA-3
et al.)	
)	Re: License Amendment
(Vogle Electric Generating)	(Transfer to Southern
Plant, Units 1 and 2))	Nuclear)
)	
)	ASLBP No. 93-671-01-OLA-3

GEORGIA POWER COMPANY'S MOTION TO CORRECT
THE RECORD OF EXHIBITS OF
THE DIESEL GENERATOR REPORTING ISSUES ALLEGATION HEARING

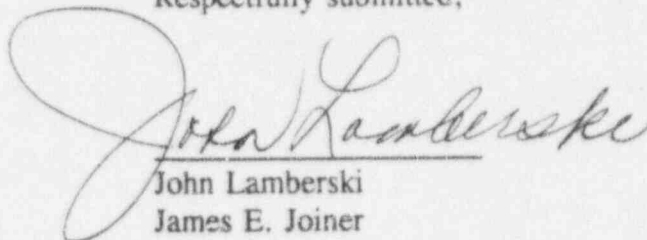
Pursuant to 10 CFR § 2.750(b), Georgia Power Company hereby moves the Licensing Board to order that the corrections indicated on Attachment "A" hereto be made to the transcript of the hearing on the Diesel Generator Reporting Issues allegation which took place April 7 through October 11, 1995 with respect to exhibits listed by the court reporter.

Georgia Power has previously communicated this information to Intervenor and the NRC Staff (several of the corrections on the list were provided earlier today). With the exception of the correction concerning Intervenor Exhibit II-247, which Georgia Power added to the attached list today, the NRC Staff is in agreement with the attached list. Intervenor has not responded.

9512140094 951212
PDR ADOCK 05000424
T PDR

DS03

Respectfully submitted,



John Lamberski
James E. Joiner

TROUTMAN SANDERS LLP
Suite 5200
600 Peachtree Street
Atlanta, GA 30308-2216

(404) 885-3360

Ernest L. Blake
David R. Lewis
SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037

(202) 663-8084

Counsel for Georgia Power Company

Dated: December 12, 1995

Attachment "A"

Date/ Attachment	Party/ Exhibit Number/ Transcript Page	Change From or Delete Exhibit Number, Description, IDENT, or REC'D	Change To or Add Exhibit Number, Description, IDENT, or REC'D
05/17/95 Attachment 1	GPC Exhs. II-27-II-42 Tr. 4624	Change Exhibit Numbers "GPC II-27" & "GPC II-42 "	Change Exhibit Numbers to: "GPC II-27 through II-42"
05/17/95 Attachment 1	GPC Exhs. II-27-II-42 Tr. 4624	Change Description: "Corrections to Aufdenkampe Testimony "	Change Description to: "Aufdenkampe Exhibits A through P"
05/17/95 Attachment 1	Intervenor Exhibit II-94 Tr. 4624	Delete Intervenor Exhibit 94 from the Exhibit List page at Tr. 4624. This was also bound in at Tr. 4844 in error. Int. II- 94, II-94A & II-94B were admitted on October 6, 1995 at Tr. 15492. Also the exhibit is Tape Transcript 32, not 269	
06/01/95 Attachment 2	Intervenor Exh. II-35 Tr. 6390	Change Description: "Interrogatory Questions"	Change Description to: "GPC Dew Point Data MWO List"
06/01/95 Attachment 2	Intervenor Exh. II-36 Tr. 6390	Change Description: "and responses"	Change Description to: "Intervenor's Seventh Request for interrogatories (7-25-94) & GPC's Response (8-8-94)"
06/01/95 Attachment 2	Intervenor Exh. II-35 & II-36 Tr. 6390	Delete: IDENT - Tr. 6572 - Exhibits 35 and 36 were not identified at Tr. 6572	
07/20/95 Attachment 3	Staff Exh. II-5 Tr. 10119	Change date in the description: "06-20-90" (The date was misquoted in the testimony at Tr. 10267 as well.)	Change date in description to "06-20-94"
07/14/95 Attachment 4	GPC Exh. II-114 Tr. 9395	Change Description from: "OI Interview of Mosbaugh Pages 158-162"	Change Description to: "DOL Trial Testimony, Mosbaugh v. GPC, March 10, 1992, Pages 1, 158-162"
04/19/95 Attachment 5	All Exhibits Tr. 3299	No Party Identification for any exhibits appear	Add GPC to Exhibits II-20 & II-21; Add Intervenor to all other exhibits on the exhibit list.
4/19/95 Attachment 5	GPC Exhibits II-20 & II-21	Change "Bockhold Testimony"	Bockhold A and B
4/19/95 Attachment 5	Intervenor Exhibit II-76A	Change "Fax"	Change to "Transcript Tape 246"

Date/ Attachment	Party/ Exhibit Number/ Transcript Page	Change From or Delete Exhibit Number, Description, IDENT, or REC'D	Change To or Add Exhibit Number, Description, IDENT, or REC'D
04/19/95 Attachment 5	Intervenor Exhibit II-19 Tr. 3299	Change Description from: "Tape Transcript"	Change Description to: "Transcript Tape 25"
04/19/95 Attachment 5	Intervenor Exhibit II-110A Tr. 3299	Change Description from: "(""	Change Description to: " Transcript Tape 34"
04/19/95 Attachment 5	Intervenor Exhibit II-24 Tr. 3299	Change Description from: "04- 90 Letter"	Change Description to: "04-09-90 COA Response Letter, Final"
04/19/95 Attachment 5	Intervenor Exhibit II-95 Tr. 3299	Change Description from: "Project Paper"	Change Description to: "August 1990 White Paper"
04/19/95 Attachment 5	Intervenor Exh. II-18 should be added Tr. 3299		Add to Description: "Handwritten List of As Found Set Points on Calcon JWTS Sensors; IDENT at Tr. 3472, It was not REC'D.
04/19/95 Attachment 5	Intervenor Exh. II-123 Tr. 3299		Add to Description: "Outage Log, 92 Project 30467-30538"
04/19/95 Attachment 5	Intervenor Exh. II-67	Change from "Letter: August 30	Change to "GPC Letter: August 30, 1990" and add exhibit as IDENT at Tr. 3478.
08/22/95 Attachment 6	Intervenor Exh. II-217 should be added Tr. 12042		Add to Description: "I&C Log, Project Nos. 010821-27" and IDENT at 12170
08/15/95 Attachment 7	Intervenor Exh. II-79 Tr. 11249		Add to Description: "Deficiency Cards, Project Nos. 65000-04, 65936-37, and 65953" and also add IDENT at 11521 and REC'D at 11522
07/12/95 Attachment 8	GPC Exhibit II-106 Tr. 9004	Change from IDENT - 9125	Change to IDENT - 9073, also Add to Description to read: "Draft LER 1-90-6 4/17/90 (8 pages)"

Date/ Attachment	Party/ Exhibit Number/ Transcript Page	Change From or Delete Exhibit Number, Description, IDENT, or REC'D	Change To or Add Exhibit Number, Description, IDENT, or REC'D
07/12/95 Attachment 8	GPC Exhibit II-107 Tr. 9004	Change from IDENT - 9127	Change to IDENT - 9125
06-02-95 Attachment 9	Intervenor Exhibit II-145 Tr. 6714 (Exhibit Index)	Change description from: "GPC II-51"	Change description to: "Modified Notice of Violation, 2/15/95 (Staff II- 51)"
09-15-95 Attachment 10	Intervenor Exhibit II-247 Tr. 14061	Delete from REC'D Column. <small>It was not allowed; see Tr. 14182-83 even though the court reporter inadvertently included it in the series of numbers at Tr. 14190</small>	
08-17-95 (In-Camera Session Attachment 11	Tr. Page 11884	Change Date from August 9, 1995	Change Date to August 17, 1995

I N D E X (cont.)

1					
2	<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
3					4820
4					4829
5					4835
6					4841
7					4843
8					4851
9					4853
10					4855

EXHIBITS

11					
12	<u>Exhibit No.</u>	<u>Description</u>	<u>IDENT</u>	<u>REC'D</u>	
13	GPCII-27-42	Corrections to Aufdenkampe	4656	4657	<i>Exhibits A-P</i>
14	GPCII-42	Testimony	4656	4657	
15	Intervenor 69	Excerpt from Transcript of	4844	4845	
16	Intervenor 94	Tape 269	4844	4845	
17	Intervenor Stipulations		4738		

18

19 *→ Also bound in error*

20

21

22

23

24

25

1

I N D E X

2

WITNESSES:DIRECT CROSS REDIRECT RE CROSS

3

George Bockhold

4

By Mr. Blake

6393

--

--

--

5

By Mr. Michael Kohn

--

6434

--

--

6

By Mr. Barth

--

6641

--

--

7

By Mr. Michael Kohn

--

6693

--

--

8

By Mr. Barth

--

6705

--

--

9

By Mr. Michael Kohn

--

6709

--

--

10

E X H I B I T S

11

EXHIBIT NO.DESCRIPTIONIDENTREC'D

12

GPC II-49/

Bockhold Exhibits

13

GPC II-57

C through K

6402

6402

14

GPC II-61

Ward Exhibit C

6602

--

15

GPC II-76/

Bockhold Exhibits

16

GPC II-80

L through P

6412

6413

17

GPC II-81/

Bockhold Exhibits

18

GPC II-85

A through E to Affidavit

6418

6419

19

Int. II-35/

1 Interrogatory questions

6418

6572

20

Int. II-36

Intervenor's Seventh Request for Interrogatories
and responses to RCP (7-25-94) and
RCP's Response (8-8-94)

6572

6572

21

Int. II-141

Deficiency Card 1-89-1317

6442

6454

22

Int. II-142

Deficiency Card 1-90-004

6442

6454

23

Int. II-143

MWO 19001651

6523

--

24

Board II-1

Calcon Sensor Brochure

6489

--

E X H I B I T S			
<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>IDENT</u>	<u>REC'D</u>
1			
2			
3	GPC II-120	Transcript of Tape 72	9693 10192
4	GPC II-121	Transcript Cover Page	9726 10192
5	GPC II-122	"Agreed" Transcript	9739 10192
6	GPC II-123	Travel Record	9744 10192
7	GPC II-125	Intervenor Exhibit 95	
8		White Papers	9830 10192
9	GPC II-126	Excerpt from Mosbaugh OI	
10		Interview: July 17th and	
11		18th, 1990; p 226	9867 10192
12	GPC II-128	Mosbaugh OI Interview Exhibits	9888 10192
13	GPC II-130	3/11/92, Trans. Mosbaugh	9909 10192
14	GPC II-131	5/14/93, Pleading	9912 10192
15	GPC II-132	NRC Meeting Notes	9915 10192
16	GPC II-133	Transcript, Tape 69	9939 10192
17	GPC II-134	Excerpt of Exhibit 3	10004 10192
18	GPC II-135	Vol 3, Mosbaugh Deposition	10017 10192
19	Staff II-2	Excerpt from 1.9 of FSAR	
20		Page 65 and 66	10201 10209
21	Staff II-3	Regulatory Guide 1.68.3	10202 10209
22	Staff II-4	Georgia Power Procedure #	
23		11882-1 Rev. 15	10213 10310
24	Staff II-5	06-20-9 ⁴ Memo from Charles	
25		Casto	10267

1	E X H I B I T S		
2	<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>IDENT</u> <u>REC'D</u>
3	GPC II-113	Mosbaugh Training Record	9397
4	GPC II-114	<i>DOL Trial Testimony, Mosbaugh v GPC, March 10, 1992</i> OI Interview of Mosbaugh	
5		↳ Pages 158-162	9440
6	GPC II-115	Mr. Tate's Notes	9446
7	GPC II-116	Trascript: Tape 172 p7-8	9537
8			9560
9	GPC II-117	Transcript: Tape 79 p14-16	9548
10			9560
11	GPC II-118	Technical Specifications 3812	9563
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

I N D E X (CONT.)

	<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>BOARD</u>
3	George Bockhold				3461 3517
4					3465 3522
5					3467
6					3474
7					3480
8					3497
9					3505

E X H I B I T S

	<u>Exhibit No.</u>	<u>Description</u>	<u>Ident</u>	<u>Rec'd</u>
11				
12	II-20 and II-21	Bockhold Testimony <i>Exhibits A & B</i>	3311	3311
13	II-76A	<i>Ex Tape Tr. 246</i>	3315	3318
14	II-19	Tape Transcript 25		3326
15	II-110A	" 34	3327	
16	II-24	COA Response 04-09 Letter, Final August 1990 White	3352	
17	II-95	Project Paper	3370	
18	II-89	Safety System Data	3383	
19	II-90	Tape 27 Transcript	3384	
20	II-57	Interrogatory Response	3425	3427
21	II-25	Tape 40 Transcript	3444	3446
22	II-123	Handwritten List of As Found Set Points on Calson JWTS Outage Log, 92 Project 30467 - 30538	3472	Sensors 3478
23	II-81	Outage Turn Over Log	3476	
24	II-67	<i>RPC</i> Letter: August 30, 1990	3478	
25	II-13	Bockhold OI Testimony	3495	

	<u>I N D E X</u>			
<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Mark Briney				
By Mr. Blake	12074	--	--	--
By Mr. M. Kohn	--	12098	--	--

6
7

	<u>E X H I B I T S</u>			
<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>IDENT</u>	<u>REC'D</u>	
GPC:				
II-153	Briney Exhibit A	12077	12077	
II-154	Briney Exhibit B	12077	12077	
II-155	Briney Exhibit C	12077	12077	
II-156	Briney Exhibit D	12077	12077	
II-157	Briney Exhibit E	12077	12077	
II-158	Briney Exhibit F	12077	12077	
II-159	Briney Exhibit G	12077	12077	
Intervenor:				
II-213A	Corrected Demonstrative Aid 14	12043	--	
II-215	Certificate of Traceability of			
	Alnor VP-2466	12046	--	
II-216	5/11/90 R. Johnston memo	12100	--	
<i>II-217</i>	<i>I & C Log, Project Nos. 10821-27</i>	<i>12170</i>	<i>--</i>	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23I N D E XWITNESSES:DIRECT CROSS REDIRECT RECROSS

William Shipman (resumed)

By Mr. Barth -- 11251 -- 11332

By Mr. M. Kohn -- 11315 -- 11335

By Mr. Blake -- -- 11328 --

Harvey Handfinger

By Mr. Blake 11344 -- -- --

By Mr. M. Kohn -- 11350 -- --

By Ms. Young -- 11446 -- --

By Mr. M. Kohn -- 11482 -- --

By Ms. Young -- 11499 -- --

By Mr. M. Kohn -- 11501 -- --

E X H I B I T SEXHIBIT NO.DESCRIPTIONIDENTREC'D

GPC:

II-149 Handfinger Exhibit A 11347 11347

II-150(a)-(e) Handfinger B (MWOs) 11349 11349

Intervenor:

II-79 ————— Deficiency Cards, Project
Nos. 65000-04, 65936-37 & 65953 11521 11522

II-213 Demonstrative Aid 11378 --

II-214 7/31/90 Letter ESG to Bockhold 11388 11389

1	E X H I B I T S			
2	<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>IDENT</u>	<u>REC'D</u>
3	Intervenor II-167	Hairston notes	9013	
4	INTERVENOR II-67 WITHDRAWN ON PAGE 9017			
5	GPC II-105	GPC working schedule	9019	
		Draft +/1/17/90	9073	
6	GPC II-106	"LER 1-90-6" (8 pages)	9125	
			9125	
7	GPC II-107	4/30 memo from Bockhold	9127	9127
8	GPC II-108	4/11/90 pgs from tape 42	9129	
9	GPC II-109	5/2/90 pgs from tape 90	9139	
10	GPC II-110	'92 proj. 057506-057511	9144	
11	GPC II-111	Handwritten memo 5/9/90	9147	
12	GPC II-112A	7/23 Motion to Compel	9174	
13	GPC II-112B	7/30 Letter, Mosbaugh	9174	

1

I N D E X

2

WITNESSES:DIRECT CROSS REDIRECT REPOSS

3

Thomas Victor Greene, Jr.

4

By Mr. Blake

6715

--

--

--

5

By Mr. Stephen Kohn

--

6732

--

--

6

By Ms. Young

--

6857

--

--

7

E X H I B I T S

8

EXHIBIT NO.DESCRIPTIONIDENTREC'D

9

GPC II-43

Greene Ex. A (Qualifications)

6717

6717

10

GPC II-44

Greene Ex. B (Tape 187 Trscpt)

6717

6717

11

Int. II-145

Modified Notice of Violation, 2/15/95
~~GPC II-51~~ (Staff II-51)

6832

6838

12

Staff II-18

Staff Version of Greene B

6884

6949

13

E X H I B I T S

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>IDENT</u>	<u>REC'D</u>
Int-II-230	GPC's 3rd response to 3rd interrogatories	*	14062
Int-II-242	Mr. Domby's notes	*	14062
Int-II-243	GPC's 4th response to 3rd interrogatories	*	14062
Int-II-244	One page from NWO 19502428	*	14062
Int-II-231	Summary Report, 02-15-90	*	14190
Int-II-245	1-pg ltr 3-16-90 from GPC	14081	14190
Int-II-246	Tape 101 Side A 05-08-90	14171	14190
Int-II-247	Excerpt of Tape 99 Side B 05-08-90	14180	14190 Denied
Int-II-248	Memo to Mr. Lyons 05-08-90	14184	14190
Int-II-249	Interview of George Frederick 06-27-90	14184	14190
Int-II-250	Interview of Mike Horton 06-26-90	14185	14190
Int-II-251	Interview of J. Aufdenkampe 07-13-90	14185	14190
Int-II-252	Audit Finding Report	14186	14190
Int-II-253	Interview notes with Skip Kitchens 06-26-90	14190	14190
Int-II-254	Procedure 00002-C	14192	14190
GPC-II-191	Review of Mr. Mosbaugh by Mr. Bockhold	14206	14207
GPC-II-192	Memo: LeGrand to Bockhold 06-21-90	14207	14211
GPC-II-193	90V0015 by W.C. Lyon 08-21-90	14208	14211
GPC-II-194	Chilling Effects/Intimidation of PRB Members	14209	14211
Int-II-89	(Previously Identified)		14211
Int-II-255	One page by Mr. Lyons	14217	14228
Int-II-256	Quality Concerns File	14218	14228

*Previously marked for identification.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

+ + + + +

ATOMIC SAFETY AND LICENSING BOARD

HEARING

-----X

In the matter of: : 50-424-OLA-3
GEORGIA POWER COMPANY, et al. : 50-425-OLA-3
: Re: License Amendment
(Vogtle Electric Generating : (transfer to
Plant, Unit 1 and Unit 2) : Southern Nuclear)
: ASLBP No.

-----X 93-671-01-OLA-3

Wednesday, August ¹⁷ 1995
Plantation Room West
Telfair Inn
326 Greene Street
Augusta, Georgia

The above-entitled matter came on for in-camera
sessin at approximately 1:17 p.m.

BEFORE:

PETER B. BLOCH Chairman
JAMES H. CARPENTER Administrative Judge
THOMAS D. MURPHY Administrative Judge

DOCKETED
USNRC

UNITED STATES OF AMERICA

'95 DEC 13 P2:47

NUCLEAR REGULATORY COMMISSION

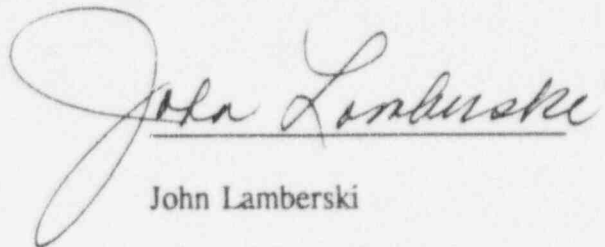
Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	Docket Nos. 50-424-OLA-3
GEORGIA POWER COMPANY,)	
et al.)	Re: License Amendment
)	(Transfer to Southern
(Vogtle Electric Generating)	Nuclear)
Plant, Units 1 and 2))	
)	ASLBP No. 93-671-01-OLA-3

CERTIFICATE OF SERVICE

This is to certify that copies of the within and foregoing "Georgia Power Company's Motion to Correct the Record of the Exhibits of the Diesel Generator Reporting Issues Allegation Hearing" were served on all those listed on the attached service list by express mail delivery. This the 12th day of December, 1995.



John Lamberski

TROUTMAN SANDERS LLP
Suite 5200
600 Peachtree Street
Atlanta, GA 30308-2216
(404) 885-3360

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
* 50-425-OLA-3
*
* Re: License Amendment
* (Transfer to Southern
* Nuclear)
*
* ASLBP No. 93-671-01-OLA-3

SERVICE LIST

Administrative Judge
Peter B. Bloch, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Administrative Judge
James H. Carpenter
Atomic Safety and Licensing
Board
933 Green Point Drive
Oyster Point
Sunset Beach, NC 28468

Administrative Judge
Thomas D. Murphy
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Michael D. Kohn, Esq.
Kohn, Kohn & Colapinto, P.C.
517 Florida Avenue, N.W.
Washington, D.C. 20001

Office of Commission Appellate
Adjudication
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Stewart D. Ebnetter
Regional Administrator
USNRC, Region II
101 Marietta Street, NW
Suite 2900
Atlanta, Georgia 30303

Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555
ATTN: Docketing and
Services Branch

Charles Barth, Esq.
Mitzi Young, Esq.
Office of General Counsel
One White Flint North
Stop 15B18
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

Director,
Environmental Protection
Division
Department of Natural
Resources
205 Butler Street, S.E.
Suite 1252
Atlanta, Georgia 30334